



**WRAP FEE PROGRAM BROCHURE**

**FORM ADV, PART 2A -APPENDIX 1**

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**JAMES AGOSTINI, CHIEF COMPLIANCE OFFICER**

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This wrap fee program brochure provides information about the qualifications and business practices of DaVinci Financial Designs. If you have any questions about the contents of this brochure, please contact us by telephone at (803) 741-0134 or email at [jim.agostini@dav-fd.com](mailto:jim.agostini@dav-fd.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Authority.

Additional information about DaVinci Financial Designs is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

Please note that the use of the term "registered investment adviser" and description of DaVinci Financial Designs and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise you for more information on the qualifications of our firm and our associates.

**PLEASE RETAIN THIS BROCHURE FOR YOUR RECORDS.**

**MATERIAL CHANGES**  
**TO OUR PART 2A APPENDIX 1 OF FORM ADV:**  
**WRAP FEE PROGRAM BROCHURE**

**DaVinci Financial Designs** is required to advise you of any material changes to our Wrap Fee Program Brochure (“Wrap Brochure”) from our last annual update of our Wrap Brochure.

This Wrap Brochure is a complete restatement of our prior Wrap Brochure. Material changes have been made to all sections of our Wrap Brochure including, but not limited to, rewriting to provide further detailed information in our description of services under “Advisory Business” and under “Fees and Compensation.”

Please note that we do not have to provide this information to a client or prospective client who has not received a previous version of our Wrap Brochure.

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## **SERVICES, FEES AND COMPENSATION**

### **ABOUT OUR SERVICES**

#### **Asset Managed Portfolios Services**

Our primary asset management services involve tailored asset managed portfolios ("AMP") which are commonly called wrapped-fee arrangements. We emphasize continuous and regular account supervision. We create a portfolio, generally consisting of mutual funds, individual stock and bonds and exchange traded funds ("ETFs"). Under certain more limited circumstances, we may also include in the portfolio other investments such as options and public and private securities.

Based on your circumstances, we will tailor a portfolio suitable for meeting your specific needs, particular investment goals and tolerance for market losses. We will review our proposed AMP with you. If you should have any objections or restrictions to any types of investments we have proposed, you will have an opportunity to let us know and, to the extent we are able to manage the account, you may place reasonable restrictions on the type of investments.

We will review your portfolio on a regular basis and at least quarterly. However, if your account value is less than \$15,000, then we may review your account less frequently. If appropriate, we will rebalance the investments. If you experience any significant change(s) to your financial or personal circumstances, you should contact us so that we can consider whether such information impacts your financial planning strategies and/or portfolio allocations warranting an off-cycle review and adjustment to your account.

#### **Life Design Services and Asset Portfolio Management**

For certain clients with assets in excess of \$250,000, we may combine Life Design Services with Asset Managed Portfolios services which are described earlier. The combined services are intended to assist clients in meeting their financial planning and investment needs by consolidating the fees for each of these services. Under certain circumstances, combining the Life Design Services and the Asset Managed Portfolios services fees may create a potential conflict of interest for us if our planning advice to you recommends a reduction in your investment assets under our management. In those situations, to avoid this potential conflict, we may ask that you pay the fees separately.

Refer to our Firm Brochure for a more detailed description of "Life Design Services" and the combination of the services under "Life Design Services and Asset Portfolio Management."

### **FEES**

#### **Asset Managed Portfolios**

Advisory fees for our Asset Managed Portfolio services are set based on a percentage of assets under management. Our fees for our AMP services may be negotiated based on the aggregated assets you have under management with us and the complexity of the investment strategy. However, negotiated fees will not exceed 3%. Our fees are assessed on the last day of the calendar quarter, on a pro-rata annualized basis, and are deducted from the account under management in advance of the next quarter. In limited circumstances, at your request, we will direct the account custodian to bill you directly for these services. We do not pay any portion of our fee to portfolio managers.

Assets Under Management	Annual Percentage of Assets Charge
Under \$15,000	2.25%
\$15,000 - \$49,999	1.50%
\$50,000 - \$249,999	1.25%
\$250,000 - \$499,999	1.15%
\$500,000 - \$999,999	1.00%
Over \$1,000,000	0.90%

All securities transactions are effected through LPL Financial, a registered broker-dealer. LPL Financial charges us for brokerage commissions and/or transaction fees for executing securities transactions in your account(s). You do not pay for these fees from your account balance. These fees are included within our compensation. However, you should also be aware that your account will be charged separately by the mutual funds for management fees and other fund expenses. DaVinci Financial Designs does not receive any portion of these fund-related fees.

In addition, you should be aware of the following:

1. You authorize us to be paid directly by the independent custodian of your account;
2. You will be sent account statements by the independent custodian on at least a quarterly basis;
3. Your account statements will list all disbursements from your account, including the advisory fee paid to us; and
4. You should compare any information we give you regarding our fees with the independent custodian's information in account opening and subsequent account statements.

If you decide to terminate your agreement with us within five (5) business days of having signed the initial agreement or within five (5) business days of having signed a renewal agreement, then fees you paid within those five (5) days will be refunded to you. At any time after the five day complete refund period, you may terminate your agreement and request a refund of unearned fees, provided that the request is in writing and provides thirty (30) days notice. Upon termination, we will refund all unearned prepaid fees, pro-rata, and cease the payments for the next calendar quarter.

### **Life Design Services and Asset Managed Portfolios**

When you combine our Life Design Services with our Asset Managed Portfolio services, you may combine the fees into a single fee structure. As a result of the combination, you will not pay a flat fee for the Life Design Services. Instead, the fee for Life Design Services is combined with the Asset Managed Portfolio services.

Like the Asset Managed Portfolio services, the fees may be negotiated based on the aggregated assets you have under management with us and the complexity of the investment strategy. However, negotiated fees will not exceed 3%. Our fees are assessed on the last day of the calendar quarter, on a pro-rata annualized basis, and are deducted from the account under management in advance of the next quarter. In limited circumstances, at your request, we will direct the account custodian to bill you directly for these services.

Assets Under Management	Annual Percentage of Assets Charge
\$250,000 - \$499,999	1.65%
\$500,000 - \$999,999	1.50%
Over \$1,000,000	1.40%

The minimum asset level to participate under this arrangement is \$250,000 but otherwise is calculated and administered like the Asset Managed Portfolios as described above.

In addition, you should be aware of the following:

1. You authorize us to be paid directly by the independent custodian of your account;
2. You will be sent account statements by the independent custodian on at least a quarterly basis;
3. Your account statements will list all disbursements from your account, including the advisory fee paid to us; and
4. You should compare any information we give you regarding our fees with the independent custodian's information in account opening and subsequent account statements.

In certain circumstances, we may have a conflict of interest when we charge the combination fee for Life Design Services and Asset Managed Portfolios. It might appear that we are incentivized to recommend strategies which keep your assets under management in the Asset Managed Portfolios. For example, we might recommend to you to draw down your assets in your accounts to fulfill your retirement plans as a part of our Life Design Services but since we get paid as a percentage of assets under management there may appear to be a conflict of interest. When this circumstance arises, we will discuss it with you and may recommend terminating the combined fee agreement and executing one for each of the services.

If you decide to terminate your agreement with us within five (5) business days of having signed the initial agreement or within five (5) business days of having signed a renewal agreement, then fees you paid within those five (5) days will be refunded to you. At any time after the five day complete refund period, you may terminate your agreement and request a refund of unearned fees, provided that the request is in writing and provides thirty (30) days notice. Upon termination, we will refund all unearned prepaid fees, pro-rata, and cease the payments for the next calendar quarter.

For additional information, please refer to the "Life Design Services" and "Asset Managed Portfolios" sections of our Firm Brochure .

#### **Additional Information about Our Fees**

A wrap fee program allows you to pay a specified fee for investment advisory services and the execution of transactions. The advisory services may include portfolio management, and the fee is not based directly upon transactions in your account. Your fee is bundled with our costs for executing transactions in your account(s). This results in a higher advisory fee to you. We do not charge our clients higher advisory fees based on their trading activity, but you should be aware that we may have an incentive to limit our trading activities in your account(s) because we are charged for executed trades. By participating in a wrap fee program, you may end up paying more or less than you would through a non-wrap fee program where a lower advisory fee is charged, but trade execution costs are passed directly through to you by the executing broker.

In addition to our fees, you may pay custodial fees, charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions. These fees are not included within the wrap-fee you are charged by our firm.

Your advisor receives a portion of the advisory fee that you pay us, either directly as a percentage of your overall fee or as their compensation from our firm. In cases where our advisor is paid a percentage of your overall advisory fee, this may create an incentive to recommend that you participate in a wrap fee program rather than a non-wrap fee program (where you would pay for trade execution costs) or brokerage account where commissions are charged. This is because, in some cases, we may stand to earn more compensation from advisory fees paid to us through a wrap fee program arrangement if your account is not actively traded.

### **TYPES OF CLIENTS and ACCOUNT REQUIREMENTS**

DaVinci Financial Designs provides its services to a wide variety of clients. Typically, we provide advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Charitable organizations
- Trusts and Estates

DaVinci Financial Designs does not require a minimum asset amount to provide our services to you. We do, however, have a few minimum fees for certain of our services. Following is a description of those requirements:

- Generally, our minimum annual fee for Life Designs Services is \$1,500.
- We generally have a \$250,000 minimum account requirement for Life Design Services combined with Portfolio Management Services.

Refer to the Firm Brochure for all minimum account requirements and fee requirements.

### **PORTFOLIO MANAGER SELECTION AND EVALUATION**

Before recommending or selecting portfolio managers for clients, we conduct initial due diligence on a fund's portfolio management, investment strategies and performance, amongst other factors. We also provide ongoing review of the fund portfolio manager's management of the portfolio. We review fund portfolio managers' reports at least annually. We will replace portfolio managers who are not meeting our criteria for fund management and performance.

When selecting fund portfolio managers, we use the similar fundamental, technical and quantitative methods of analysis in its selection of equity and other securities for individual client accounts. When doing our analysis we use outside investment research. Some of these outside sources of information we use when developing our investment strategies include information from broker - dealers and other third

parties, investment publications on general economic conditions, and financial publications from the investment banking industry and from other members of the professional investment community. We have the flexibility when choosing which research we use and to tailor investment recommendations to meet your risk tolerance and financial plan goals/strategy.

Each investment strategy we use reflects your financial goals, investment objectives, risk tolerance and time horizon. We use the following methods of analysis to design an investment strategy for you which aligns with your personal life design strategy (Financial Plan):

- **Alpha Based Investing.** The return generated from an Alpha Based Investment is based on a risk-adjusted basis. Alpha uses the volatility (price risk) of an investment and compares its risk-adjusted performance to a benchmark. The excess return of the investment relative to the return of the benchmark is the investment's alpha. We align your risk tolerance and wealth management strategy to this risk reward profile.
- **Modern Portfolio Theory ("MPT").** MPT is a theory on how to minimize risk by carefully choosing proportions of various assets that comprise a portfolio to optimize or maximize an expected return based on a given level of market risk, emphasizing that the risk is an inherent part of higher reward. Construction of these portfolios develops an "efficient frontier" of optimal strategies offering the maximum possible expected return for a given level of risk.
- We generally use long-term purchases of securities with the idea of holding them for relatively longer periods of time (typically held for at least a year) to implement our method of analysis. A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to you. Moreover, if our predictions are incorrect, an investment may decline sharply in value before we make the decision to sell. This method of approach is fundamentally based on the theory that investors rely on an overall investment strategy as a component of a larger comprehensive financial plan/strategy and behave rationally to economic conditions.

**Please Note:**

Risks involved in these strategies will depend upon the types of investments chosen. Investing in securities involves risk of loss that you should be prepared to bear. All securities have the risk of potential for loss of income or principle. These strategies involve the use of benchmarks which reflect past performance. Although this is reasonable methodology, benchmarks reflect past performance and do not guarantee future performance. Therefore, the risk of these methods of analysis is the uncertainty of market performance. Generally, investments have costs such as fees, even when there is a negative return. Additionally, there is a time lag and price uncertainty to the purchase of securities. You should also account for other risks such as market volatility, inflation, credit risk and interest rate changes.

Depending on the strategy that is right for you, different types of securities can be recommended, including mutual funds, unit investment trusts, collective investment trusts, and equities. Securities such as mutual funds carry the risk of lack of control in that fund or portfolio managers decide when to buy



and sell. A market volatility risk comes with investing in the stock market. While the market may increase and your account(s) could enjoy a gain, it is also possible that the stock market may decrease and your account(s) could suffer a loss. It is important that you (1) understand the risks associated with investing in the stock market, (2) are appropriately diversified in your investments, and (3) ask us any questions you may have.

We generally place your cash balances in an FDIC insured cash account. We try to achieve the highest return on your cash balances through this relatively low-risk conservative account. In most cases, at least a partial cash balance will be maintained in this insured cash account so that our firm may debit advisory fees for our services related to Asset Managed Portfolios, or the combined Life Design Service and Asset Managed Portfolios Services, as applicable.

We act as portfolio manager(s) for the wrap fee program(s) previously described in this Wrap Brochure. This may create a conflict of interest in that other investment advisory firms may charge the same or lower fees than our firm for similar services. Our portfolio managers are not subject to the same selection and review as outside portfolio managers that do not participate in the wrap fee program. This is because we have chosen not to utilize outside portfolio managers.

#### **CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGER(S)**

We are required to describe the information about you that we communicate to your portfolio manager(s), and how often or under what circumstances we provide updated information. Our firm communicates with your portfolio manager(s) on a regular basis as needed (daily, weekly, monthly, etc) to ensure your most current investment goals and objectives are understood by your portfolio manager(s). In most cases, we will communicate such information as part of our regular investment management duties. Nevertheless, we will also communicate information to your portfolio manager(s) when you ask us to, when market or economic conditions make it prudent to do so, etc.

#### **CLIENT CONTACT WITH PORTFOLIO MANAGER(S)**

Clients are always free to directly contact their portfolio manager(s) with any questions or concerns they have about their portfolios or other matters.

#### **ADDITIONAL INFORMATION**

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

As a matter of firm policy, we do not vote proxies on your behalf. Therefore, although our firm may provide investment advisory services relative to your investment assets, you maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities you beneficially own shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to your investment assets. You are also responsible for instructing each custodian of the assets, to forward you copies of all proxies and shareholder communications relating to your investment assets.

We do not offer you any consulting assistance regarding proxy issues.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that

we require of our advisors and associates, including compliance with applicable state and Federal securities laws. DaVinci Financial Designs and our advisors owe a duty of loyalty, fairness and good faith towards you, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide fiduciaries. As a fiduciary, it is an advisor's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times and to avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients.

Our firm and/or its advisors may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, the firm and/or our advisors may have an interest or position in a certain security(ies) which may also be recommended to a client. We recognize that the personal investment transactions of our advisors and associates demand high standards. As a result, our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our advisors will not interfere with (i) making decisions in the best interest of our clients; and (ii) allowing advisors and associates to invest for their own accounts. In order to prevent conflicts of interest and to monitor compliance with our policies, we have procedures for pre-clearance, in some cases, of transactions, the review of quarterly securities transaction reports and initial and annual securities holdings reports that must be submitted by our associates. Our Code of Ethics also provides for oversight, enforcement and recordkeeping provisions.

In situations which might represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics, to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

- No advisor or associate of our firm may put his or her own interest above the interest of an advisory client.
- To prevent the misuse of material non-public information by our advisors (often referred to as insider trading), no associate of our firm may buy or sell securities for his other personal portfolio(s) where his or her decision is a result of information received as a result of his or her association unless the information is also available to the investing public.
- It is the expressed policy of our firm that no person associated with us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account. This prevents such associates from benefiting from transactions placed on behalf of advisory accounts.
- Our firm requires prior approval for any initial public offerings or private placement investments by the firm's associates.
- We maintain a list of all reportable securities holdings for our firm and anyone associated with this advisory practice that has access to advisory recommendations ("access person"). These holdings are reviewed on a regular basis by our firm's Chief Compliance Officer or his/her designee.
- All of our associates must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
- We have established procedures for the maintenance of all required books and records.
- All clients are fully informed that related persons may receive separate commission compensation when effecting transactions during the implementation process.

You can decline to implement any advice rendered, except in situations where our firm is granted discretionary authority. However, as part of our services, an advisor may provide recommendations as to investment products or insurance. To the extent that an advisor recommends that you invest in products or services that will result in compensation being paid to us, this presents a conflict of interest. The compensation the advisor and we may be more or less depending on the product or services that the advisor recommends. Therefore, the advisor has a financial incentive to recommend that a financial plan or strategy be implemented using a certain product or service over another product or service.

You should also understand that we may perform advisory and/or brokerage services for various other clients, and that we may give advice or take actions for those other clients that differ from the advice given to you. The timing or nature of any action taken for the account may also be different.

We have established policies requiring the reporting of Code of Ethics violations to our senior management. Anyone who violates any of the above restrictions may be subject to being disassociated from our firm.

As disclosed in the Firm Brochure under “Other Financial Industry Activities and Affiliations,” our firm’s associates are separately registered as securities representatives of a broker-dealer, investment adviser representatives of another registered investment adviser, and/or licensed as an insurance agent/broker of various insurance companies. Please refer to “Other Financial Industry Activities and Affiliations” of our Firm Brochure for a detailed explanation of these relationships and important conflict of interest disclosures.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to [jim.agostini@dav-fd.com](mailto:jim.agostini@dav-fd.com), or by calling us at 803-741-0134.

### **Brokerage Practices**

DaVinci Financial Design has a non soft-dollar arrangement with LPL Financial under which we receive services such as research and administrative functions including portfolio pricing, account statement generation and fee calculations, which are intended to support our firm in conducting business and in serving the best interests of our clients. We do not receive client brokerage commissions (or markups/markdowns) to obtain research or other products or services. We recommend LPL Financial to our clients because we believe that LPL Financial’s level of competitive pricing and professionalism serves our clients’ interests in receiving best execution. We do not receive soft dollars, products or services acquired with client brokerage commissions. Our firm does not receive brokerage for client referrals. We do not allow you to direct us to send a securities transaction for execution by a broker other than LPL Financial, a qualified custodian and broker-dealer.

We perform investment management services for various clients. There are occasions when portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous of our client accounts with similar investment objections. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, such transactions are affected only when we believe that they will be in the best interest of the affected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situations, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary allocation methods.

## **Review of Accounts**

As described in our advisory services agreement, we review your accounts regularly intending to learn whether your accounts are in line with your investment objectives and appropriately positioned based on market conditions and investment policies. We generally review your accounts with you on a quarterly basis. For account valued below \$15,000, we may review these accounts with you less frequently than quarterly. Certain events may trigger us to perform an off-cycle review of your accounts. Major market or economic events, your life events or requests by you are some examples of such triggering events. Your advisor or portfolio managers will conduct your reviews.

We will recommend rebalancing your accounts, as appropriate, or other actions to address your current circumstances and market conditions. Your advisor will conduct the review with you. Unless you ask us to do so, we do not typically document our reviews of your accounts in written reports. Similarly we do not automatically update written financial plans unless you contract with us to do so.

## **Client Referrals and Other Compensation**

It is our policy not to engage or pay anyone for referring potential clients to our firm. To the extent that they are in compliance with law and regulations relating to client referrals, some of our advisors may participate in various marketing programs but do not pay a fee for any lead or solicitation of a potential client. We are paid by sponsoring mutual fund companies for providing advisory services to benefit employers and employee at no fee for our services and we receive advisory fees from third party money managers to whom we refer clients. Both of these circumstances are described in greater detail under About Our Services.

We may also be compensated by LPL Financial, our broker-dealer, in different ways, for example, payments based on production, reimbursements of fees we pay to LPL Financial for items such as administrative services, and other things of value such as free or reduced-costs marketing materials, payments in connection with the transition of an advisor's association from another investment advisor and/or broker dealer to us and LPL Financial, or attendance at LPL conferences and events. These payments are typically received by advisors based on the advisors overall production and/or on the amount of assets serviced by LPL as broker dealer. As a result of this compensation, our advisors may have a financial incentive to recommend some services or programs to you.

We may benefit when LPL Financial or a mutual fund company, without cost and/or at a discount, provide us support services and/or products, to assist us to better monitor and service client accounts maintained at such institutions. Included within the support services we may receive investment-related research, pricing information and market data, computer hardware and/or software and other technology to assist us in our investment advisory business operations, compliance and/or practice management-related publications, consulting services, attendance at conferences, meetings, and other educational and/or social events, marketing support.

You do not pay more for investment transactions effected and/or assets maintained at LPL Financial as a result of these arrangements. There is no commitment made by us to LPL Financial or any other institution as a result of the above arrangement.

## **Custody**

Our firm does not have actual or constructive custody of your accounts.

We previously disclosed in the "Fees and Compensation" section of this Brochure when our firm

directly debits advisory fees from your accounts.

As part of this billing process, your account custodian is advised of the amount of our fee you authorized us to deduct from your account. On at least a quarterly basis, your account custodian is required to send you a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for you to carefully review your account statements to verify the accuracy of the calculation, among other things. You should contact us directly if you believe that there may be an error in your statement.

### **Investment Discretion**

When you hire us to provide discretionary asset management services, we place transactions in your account without contacting you prior to each transaction to obtain your permission. This type of arrangement only applies to our Asset Managed Portfolios and combination Life Designs Services and Asset Managed Portfolio clients.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

You give us discretionary authority when you sign a discretionary agreement with our firm, and you may limit this authority by giving us written instructions. You may also change/amend such limitations by once again providing us with written instructions.

### **Financial Information**

Since DaVinci Financial Design is an advisory firm that maintains discretionary authority for clients accounts, we are required to disclose any financial condition that is reasonable likely to impair our ability to meet our obligations. We have no such financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$500 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

DaVinci Financial Designs has not been the subject of a bankruptcy petition at any time during the past ten years.

### **Requirements For State-Registered Advisers**

James S. Agostini is the Manager and Chief Compliance Officer of DaVinci Financial Designs LLC. Jeb Zoller is an Executive Officer of DaVinci Financial Designs LLC. For additional information regarding the education and business experience of these gentlemen, please refer to their individual brochures.

DaVinci Financial Designs LLC has no other information to disclose.