

Lincoln Capital Corporation
Form ADV Part 2A
Investment Adviser Brochure

March 2014

This brochure provides information about the qualifications and business practices of Lincoln Capital. If you have any questions about the contents of this brochure, please contact Ronald E. Albert, President and Chief Compliance Officer at (401) 454-3040 and/or info@lccorp.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. Registration as an investment advisor does not imply a certain level of skill or training.

Additional information about Lincoln Capital is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number, Lincoln Capital Corporation's CRD Number is 109922.

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Providence, RI 02903
401.454.3040
info@lccorp.com

Item 2: Summary of Material Changes

Annual Update

This Item of the brochure is updated if material changes have occurred during the course of the Lincoln Capital Corporation's (Lincoln Capital or the Form) fiscal year; or with the Lincoln Capital's Annual Updating Amendment (ADV).

Material Changes since the Last Update

Since the last ADV Annual Amendment filing, no material changes have occurred.

In the future, we will ensure that you receive a summary of any material changes to our brochure within 120 days of your fiscal year end. We may also provide updated disclosure information about material changes on a more frequent basis. Any summaries of changes will include the date of our last annual update of our brochure.

Full Brochure Available

We will provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, Lincoln Capital's Brochure may be requested by contacting Ronald E. Albert, President and Chief Compliance Officer at 401.454.3040 or info@lccorp.com.

Additional information about Lincoln Capital is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Lincoln Capital who are registered, or are required to be registered, as investment adviser representatives of Lincoln Capital.

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Item 4: Advisory Business

Firm Description

Since 1991, Lincoln Capital Corporation (Lincoln Capital or the Firm) has provided investment advisory services to individuals, pension and profit sharing plans, trusts, and estates.

Lincoln Capital is strictly a fee-only investment management firm. The Firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The Firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted. Lincoln Capital does not participate in a wrap fee program.

Principal Owners

Lincoln Capital is principally owned by Ronald E. Albert, with minority interests held by members of his immediate family.

Types of Advisory Services

Lincoln Capital offers discretionary portfolio management services for individuals, professionals and small businesses. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, Lincoln Capital develops a client's personal investment policy and creates and manages a portfolio based on that policy. Lincoln Capital manages advisory accounts on a discretionary basis only. Account supervision is guided by the stated objectives of the client (i.e., maximum capital appreciation, growth, income, growth and income, etc.).

Client portfolios under Lincoln Capital management consist of one or all of the following: individual equities, bonds, no-load or load-waived mutual funds, and ETFs (exchange traded funds). Lincoln Capital will allocate the client's assets among various investments taking into consideration the overall management style selected by the client.

Mutual funds will be selected on the basis of any or all of the following criteria: the fund's performance history; the industry sector in which the fund invests; the track record of the fund's manager; the fund's investment objectives; the fund's management style and philosophy; and the fund's management fee structure and expenses.

Portfolio weighting between funds and market sectors will be determined by each client's individual needs and circumstances. Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the client's behalf. Clients retain individual ownership of all securities.

Lincoln Capital offers the following strategies: Income Only; Conservative Balanced; Balanced; Equity Tilted Balanced, and Equity Only.

Client Assets

As of December 31, 2013, Lincoln Capital managed \$163,508,262 in assets; all assets are managed on a discretionary basis.

Item 5: Fees and Compensation

Compensation

Our fee schedule, at annual rates, is as follows: For Equity and Balanced Accounts: 1.00% of the first \$1,000,000, 0.60% on amounts over \$1,000,000. Fixed income accounts and variable annuity contracts are charged at the annual rate of 0.50%. Related accounts may be aggregated for fee calculations and certain client directed holdings may be deducted from the account value for billing purposes. Fees are charged quarterly in arrears based on the account value at the end of each calendar quarter.

The specific manner in which fees are charged by Lincoln Capital is established in a client's written agreement with Lincoln Capital. Clients may elect to be billed directly for fees or authorize Lincoln Capital to directly debit fees from client accounts.

Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any unpaid fees will be due and payable.

Other Fees

Lincoln Capital's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Such charges, fees and commissions are exclusive of and in addition to Lincoln Capital's fee, and Lincoln Capital does not receive any portion of these commissions, fees, and costs.

General Information on Compensation

In certain circumstances, fees, account minimums and payment terms are negotiable depending on client's unique situation – such as the size of the aggregate related party portfolio size, family holdings, low cost basis securities, or certain passively advised investments and pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets, type of portfolio, or the time involved, the degree of responsibility assumed, complexity of the engagement, special

skills needed to solve problems, the application of experience and knowledge of the client's situation.

A client agreement may be canceled at any time, by either party, for any reason upon receipt of written notice. Upon termination of any account, any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

Clients should note that similar advisory services may (or may not) be available from other registered investment advisers for similar or lower fees.

Item 6: Performance-Based Fees and Side-by-Side Management

Neither Lincoln Capital nor any of its supervised persons (employees) accepts performance-based fees (fees based on a share of capital gains or on capital appreciation of the assets of a client).

Lincoln Capital does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7: Types of Clients

Types of Clients

Lincoln Capital is a registered investment adviser providing advice to individuals, pension and profit sharing plans, trusts, estates.

Account Minimums

Lincoln Capital may require a minimum account size of \$250,000 for investment advisory clients, although this may be negotiable in certain circumstances. Lincoln Capital may group related client accounts for the purposes of achieving the minimum account size.

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

Methods of Analysis

Lincoln Capital may employ the following security analysis methods: fundamental analysis; charting/technical analysis; and cyclical analysis.

Fundamental Analysis. Lincoln Capital attempts to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Charting/Technical Analysis. The terms “charting” and “technical” analysis are generally used synonymously and therefore, for the purpose of this document, the term, “technical analysis” will not be used. Lincoln Capital analyzes past market movements and applies that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

Cyclical Analysis. In this type of technical analysis, Lincoln Capital measures the movements of a particular stock against the overall market in an attempt to predict the price movement of the security.

Investment Strategies

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security’s particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a future dollar will not buy as much as a dollar today, because purchasing power is eroding at the rate of inflation.

- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric utility company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Lincoln Capital reserves the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives. Lincoln Capital may also provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship or on any investment on which the client requests advice.

Item 9: Disciplinary Information

Lincoln Capital and its employees have never been involved in any legal or disciplinary events related to past or present investment clients.

Item 10: Other Financial Industry Activities and Affiliations

Financial Industry Activities

Lincoln Capital is not registered as a broker-dealer, and none of its management persons are registered representatives of a broker-dealer.

Neither Lincoln Capital nor any of its management persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

Other Financial Industry Activities and Affiliations

Neither Lincoln Capital nor any of its management persons have a material relationship or arrangement with any related person in the financial industry.

Other Investment Advisors

Lincoln Capital does not recommend or select other investment advisors for its clients.

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

Code of Ethics

Lincoln Capital employees must comply with a Code of Ethics and Statement for Insider Trading. The Code describes the Firms' high standard of business conduct, and fiduciary duty to its clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading,
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations.
- Requirement to maintain confidentiality of client information,

The Chief Compliance Officer, Ronald E. Albert, reviews all employee trades each quarter. His trades are reviewed by Brittany Moran and Nina Walsh. These reviews ensure that personal trading does not affect the markets, and that clients of the Firm receive preferential treatment.

All employees Lincoln Capital must acknowledge the terms of the Code of Ethics at least annually.

Clients and prospective clients can obtain a copy of Lincoln Capital's Code of Ethics by contacting Ronald E. Albert at (401) 454-3040.

Participation or Interest in Client Transactions – Personal Securities Transactions

Lincoln Capital and its employees may buy or sell securities identical to those recommended to clients for their personal accounts. These trades may not occur ahead of client trades. The Code of Ethics, described above, is designed to assure that the personal securities transactions, activities and interests of the employees of Lincoln Capital will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to

invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Lincoln Capital's clients. In addition, the Code requires pre-clearance of certain transactions. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Lincoln Capital and its clients.

Participation or Interest in Client Transactions

Neither Lincoln Capital nor its employees recommend to clients or buy or sell for client accounts, securities in which they have a material financial interest.

Participation or Interest in Client Transactions – Financial Interest and Principal/Agency Cross

Lincoln Capital and its employees do not recommend to clients, or buy or sell for client accounts, securities in which they have a material financial interest.

It is Lincoln Capital's policy that the Firm will not affect any principal or agency cross securities transactions for client accounts. Lincoln Capital will also not cross trades between client accounts.

Participation or Interest in Client Transactions - Aggregation

As described in Item 12, Lincoln Capital and its employees may trade in the same securities with client accounts on an aggregated basis when consistent with Lincoln Capital's obligation of best execution. In such circumstances, the affiliated and client accounts will be allocated securities at a total average price.

Item 12: Brokerage Practices

Research and Other Soft Dollar Benefits

Lincoln Capital does not receive formal soft dollar benefits other than execution from broker/dealers in connection with client securities transactions.

Brokerage for Client Referrals

Lincoln Capital does not receive client referrals from broker/dealers.

Directed Brokerage

Lincoln Capital shall generally recommend that portfolio management clients establish brokerage accounts with Schwab, a registered broker-dealer, member FINRA/SIPC, to maintain custody of clients' assets and to effect trades for their accounts.

Lincoln Capital is independently owned and operated and not affiliated with Schwab. Schwab provides Lincoln Capital with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis and are not otherwise contingent upon Lincoln Capital committing to Schwab any specific amount of business (assets in custody or trading).

For Lincoln Capital's client accounts maintained there, Schwab is compensated through commissions or other transaction-related fees for securities trades that are executed through Schwab or that settle into Schwab accounts. The brokerage commissions and/or transaction fees charged by Schwab or any other designated broker-dealer are exclusive of and in addition to Lincoln Capital's fees.

Lincoln Capital may receive from Schwab, at no cost to Lincoln Capital, professional services, computer software and related systems support, enabling Lincoln Capital to better monitor client accounts maintained at Schwab. Schwab's support includes (i) access to client account data (such as trade confirmations and account statements); (ii) facilitation of trade execution and allocation of aggregated trade orders for multiple client accounts; (iii) research, pricing and other market data; (iv) facilitation of payment of Lincoln Capital fees from its clients' accounts; and (v) assistance with back-office functions, recordkeeping and client reporting.

Lincoln Capital may receive this support without cost because of the portfolio management services rendered to clients that maintain assets at Schwab. The support provided may benefit Lincoln Capital, but not its clients directly. In fulfilling its duties to its clients, Lincoln Capital endeavors at all times to put the interests of its clients first. Clients should be aware, however, that Lincoln Capital's receipt of economic benefits from a broker-dealer may create a conflict of interest since these benefits may influence Lincoln Capital's choice of broker-dealer over another broker-dealer that does not furnish similar services, software and systems support.

The commissions paid by Lincoln Capital's clients shall comply with Lincoln Capital's duty to obtain "best execution." However, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where Lincoln Capital determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while Lincoln Capital will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions.

Trade Aggregation

Lincoln Capital typically aggregates trades for multiple accounts. Orders for the same security entered on behalf of more than one client will generally be aggregated (i.e., blocked or bunched) subject to the aggregation being in the best interests of all

participating clients. If the order is filled at different prices during the day, the prices are averaged for the day so that all participating accounts receive the same price. If an order has not been filled completely so that there are not enough shares to allocate among all the clients equally, shares will be allocated in good faith, based on the following considerations: amount of cash in the account, existing asset allocation and industry exposure, risk profile, and type of security.

Lincoln Capital's allocation procedure seeks to be fair and equitable to all clients with no particular group or client(s) being favored or disfavored over any other clients.

As disclosed in Item 11, accounts for Lincoln Capital or its employees may be included in a block trade with client accounts.

Item 13: Review of Accounts

Reviews

Ronald E. Albert, President and Chief Compliance Officer, and Brittany A. Moran, Vice President and Financial Advisor, are responsible for managing portfolios in accordance with the clients' investment objectives and constraints. This management process includes on-going oversight of the portfolio's investments, buying and selling securities, and communication with clients. Other conditions that may trigger a review are changes in market, political or economic conditions, tax laws, new investment information, and changes in a client's own situation.

Reporting

Each month, the custodian provides clients with an account statement for each client account, which may include individual holdings, cost basis information, deposits and withdrawals, accrued income, dividends, and performance. In addition, the custodian provides clients with trade confirmations for each position bought and sold.

Lincoln Capital also provides clients with a quarterly report including an account appraisal that identifies the current positions as of the reporting date, current value, capital contributions and withdrawals, and percentage weighting within the portfolio of each security. A performance summary is also provided for the portfolio during the most recent quarter, year-to-date, and twelve-month cycle. Each quarter, clients receive research and market commentary.

Client meetings are encouraged and are scheduled annually or less frequently as specific situations dictate.

Clients may also access account information at any time using Schwab Alliance.

Item 14: Client Referrals and Other Compensation

Other Compensation

Lincoln Capital does not receive any formal economic benefits (other than normal compensation and benefits described in Item 12) from any firm or individual for providing investment advice.

Compensation – Client Referrals

Lincoln Capital does not make or accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Item 15: Custody

Custody – Fee Debiting

Clients may authorize Lincoln Capital (in the client agreement) to debit fees directly from the client's account at the broker dealer, bank or other qualified custodian (custodian). The custodian is advised in writing of the limitation of Lincoln Capital's access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to Lincoln Capital.

Custody – Account Statements

As described above, clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian (custodian) that holds and maintains client's investment assets. Clients are urged to carefully review such statements and compare such official custodial records to the account statements or other reports that Lincoln Capital provides clients. Lincoln Capital statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

Through the investment management agreement, Lincoln Capital accepts limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows Lincoln Capital to execute trades on behalf of clients.

When such limited powers exist between the Lincoln Capital and the client, Lincoln Capital has the authority to determine, without obtaining specific client consent, both the amount and type of securities to be bought to satisfy client account objectives. Additionally, Lincoln Capital may accept any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to Lincoln Capital in writing.

Item 17: Voting Client Securities

Lincoln Capital votes proxies for securities over which it maintains discretionary authority consistent with its proxy voting policy.

Lincoln Capital acts as a discretionary investment adviser for various clients, including clients governed by the Employee Retirement Income Security Act of 1974 (ERISA).

When the responsibility to vote proxies has been assigned to Lincoln Capital, the Firm's utmost concern is that all decisions be made solely in the best interest of the client (and for ERISA accounts, plan beneficiaries and participants, in accordance with the letter and spirit of ERISA). Lincoln Capital will act in a prudent and diligent manner intended to enhance the economic value of the assets of the client's portfolio.

Ronald E. Albert, President and Chief Compliance Officer, is ultimately responsible for ensuring that all proxies received by Lincoln Capital are voted in a timely manner and in a manner consistent with Lincoln Capital's determination of the client's best interests. Although many proxy proposals can be voted in accordance with Lincoln Capital's established guidelines, Lincoln Capital recognizes that some proposals require special consideration, which may dictate that Lincoln Capital makes an exception to the guidelines.

Clients may direct Lincoln Capital's vote; direction must be received in writing.

Clients may contact Ronald E. Albert at (401) 454-3040 for information about Lincoln Capital's Proxy policies and information about how Lincoln Capital voted any proxies on behalf of their account(s).

Item 18: Financial Information

Lincoln Capital has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Lincoln Capital is not required to provide a balance sheet; Lincoln Capital does not require prepayment of fees of more than \$1,200 per client, **and** more than six months in advance.

Lincoln Capital Corporation
Form ADV Part 2B
Investment Adviser Brochure Supplement

Supervisor: Ronald E. Albert

Supervised Persons:
Brittany A. Moran

March 2014

This brochure supplement provides information about the Firm's Supervised Persons that supplements the Lincoln Capital Corporation's brochure. You should have received a copy of that brochure. Please contact Ronald E. Albert, President and Chief Compliance Officer, at 401.454.3040 and/or info@lccorp.com, if you did not receive Lincoln Capital Corporation's brochure or if you have any questions about the contents of this supplement.

Additional information about the Firm's Supervised Persons is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number for each Supervised Person.

40 Westminster Street, Suite 202
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Educational Background and Business Experience

Education and Business Background

Lincoln Capital requires that advisers in its employ have a bachelor's degree and further coursework demonstrating knowledge of the investment markets and related subjects. Examples of acceptable coursework include: an MBA, a CFP®, or a CFA designation. Additionally, advisers must have work experience that demonstrates their aptitude for financial planning and investment management.

Supervised Persons

Ronald E. Albert
CRD #827311

Born 1953

Business Background:

Lincoln Capital Corporation 1991 – Present
President, Chief Compliance Officer and Investment Advisor Representative

Dean Witter Reynolds 1985 – 1991
Vice President, Branch Manager

Formal Education after High School and Professional Designation:

BA from University of Rhode Island
MS from Bryant College
Certified Financial Planner (CFP®)

Brittany A. Moran
CRD #4987748

Born 1984

Business Background:

Lincoln Capital Corporation 2011 – Present
Vice President, Financial Advisor and Investment Advisor Representative

Bank of America, NA / Merrill Lynch 2009 – 2011
Financial Advisor

Merrill Lynch, Pierce, Fenner & Smith Incorporated 2006 – 2009
Financial Advisor

Formal Education after High School and Professional Designation:

BS-Finance from George Washington University
Certified Financial Planner (CFP®)

Professional Certifications

Lincoln Capital's supervised persons maintain professional designations, which require one of the following minimum requirements:

CFP® - Certified Financial Planner

Issued by: Certified Financial Planner Board of Standards, Inc.

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

Examination Type: CFP® Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2-years

Disciplinary Information

Disciplinary Information

Neither Lincoln Capital nor any management persons have ever been involved in any activities resulting in a disciplinary disclosure.

Other Business Activities

Other Business Activities

As disclosed in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations, neither Ronald E. Albert nor Brittany A. Moran, has any Outside Business Activities.

As disclosed in Form ADV Part 2A Item 6 – Performance-based Fees and Side-by-Side Management, neither Lincoln Capital nor any supervised persons receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

Additional Compensation

No Supervised Person receives any formal economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals or new accounts.

Supervision

Supervision

Ronald E. Albert, President and Chief Compliance Officer, supervises all persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Ronald E. Albert supervises these persons by holding regular staff, investment and other ad hoc meetings. In addition, Ronald E. Albert regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Ronald E. Albert may be reached at (401) 454-3040.