

**Firm Brochure**  
(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of Clutinger, Williams & Verhoye, Inc. If you have any questions about the contents of this brochure, please contact us at: (619) 326-0900, or by email at: [sbwcwv@aol.com](mailto:sbwcwv@aol.com). The information in this brochure has not been approved or verified by the United States Securities & Exchange Commission, or by any state securities authority.

Clutinger, Williams & Verhoye, Inc. is a Registered Investment Advisor. Registration with the Securities & Exchange Commission does not imply a certain level of skill or training.

Additional information about Clutinger, Williams & Verhoye, Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

September 15<sup>th</sup>, 2014

## **Material Changes**

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### **Annual Update**

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

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### **Material Changes since the Last Update**

Clutinger, Williams & Verhoye, Inc. Has begun offering an Investment Advisory Service to Employer Sponsored Retirement Plans in Colorado. Information about this service is contained throughout this brochure.

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## **Advisory Business**

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### **Firm Description and Principal Owners**

Clutinger, Williams & Verhoye, Inc., (“CWV”) was founded in 1970. The Principal Owners are: Scott B. Williams, CFA, CFP a 50% stockholder and Thomas M. Clutinger a 50% stockholder.

CWV is strictly a fee-only investment management firm. The firm does not receive commissions for purchasing or selling 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.

CWV does not act as a custodian of client assets. The client always maintains asset control. CWV places trades for discretionary clients under a limited power of attorney. Non-discretionary clients are responsible for placing their own trades.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent that investment management may be beneficial to the client.

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### **Fiduciary Duty to Act in Client’s Best Interest**

CWV is an independent Registered Investment Advisor (“RIA”), and under federal and state law, CWV is a fiduciary. As a fiduciary, CWV has the legal obligation to act in the client’s best interest, to seek to avoid conflicts of interest, and to provide full disclosure of all material facts between CWV and its clients that could affect the advisory relationship.

## **Types of Advisory Services**

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### **Investment Advisory Services**

CWV provides personalized confidential investment management to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations and small businesses.

CWV will furnish clients with continuous advisory supervision and recommendations concerning their portfolio. This is done for each client taking into consideration such relevant factors as: goals, obligations, other assets, suitability, and tolerance for risk as determined by the client and CWV in light of prevailing market and economic conditions.

CWV will, on occasion, but not as a regular course of its business, do a one-time analysis of an individual’s portfolio. The service would be for individuals

who do not desire continuous “investment advisory services” but who wish their portfolio analyzed. CWV will undertake such a one-time analysis taking into consideration all relevant factors known about the client at the time. An example of this would be when CWV is asked by a Probate Attorney to assist an Executor in a portfolio analysis to determine which securities should be sold to raise cash needed for the estate expenses. This service produces less than 1% of our revenues.

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### **Employer Sponsored Retirement Plan Services**

CWV provides investment advisory services to employer sponsored retirement plans including but not limited to the following types of plans: 401(k), 403(b), 457, Defined Benefit, Employee Stock Ownership Plans, and 409A Nonqualified Deferred Compensation Plans.

CWV provides comprehensive services to employer sponsored retirement plans through its “Naviguidance360<sup>sm</sup>” program by:

- Benchmarking the performance and fees of the retirement plan to plans of similar size and plans within the same industry of the sponsor.
- Providing managed investment models.
- Acting as an ERISA Section 3(38) investment fiduciary to the plan, thereby significantly limiting the employer liability.
- Assisting plan sponsors in preparing the Investment Policy Statement (“IPS”), which reflects the overall investment objectives, policies, constraints and risk tolerances of the client’s plan.
- Offering plan participants information to help them in determining the most appropriate investment selection for their financial situation.
- Coordinating the team of service providers that provide the back-end support of the employer plan in an “unbundled” open-architecture structure with complete transparency of services and fees.

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### **Assets Under Management**

As of June 30<sup>th</sup> 2014, our fiscal year end, CWV manages approximately \$144,105,284 in assets for approximately 173 clients. Approximately \$130,955,436 is managed on a discretionary basis, and \$13,149,848 is managed on a non-discretionary basis.

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### **Tailored Relationships**

The goals and objectives for each client are documented in our client relationship management system. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

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### **Types of Agreements**

The only type of agreement we enter into is an Investment Management Agreement.

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### **Investment Management Agreement**

An Investment Management Agreement will be executed before the start of a client relationship. This can be discretionary, where we are granted limited trading authority, or non-discretionary, where the client approves all changes to the portfolio and contacts the custodian to execute those changes. Management fees will be listed in the Fees & Compensation section below.

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### **Hourly Planning Engagements**

CWV rarely, but on occasion as mentioned in the Advisory Services Offered section, provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited-scope engagements is \$400 per hour.

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### **Asset Management**

Assets are invested primarily in stocks, bonds, exchange traded funds (ETFs), and closed end funds.

Investments may also include: warrants, commercial paper, certificates of deposit, municipal securities, U. S. government securities, options contracts, futures contracts, and interests in partnerships.

## **Compensation for Investment Advisory Services**

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### **Fees**

CWV bases its investment management fees on a percentage of assets under management. Usual compensation to CWV per account is a continuing annual fee based on the following schedule.

The fee schedule is:

- 1% on the first \$500,000 of managed assets
- 0.75% on the next \$500,000 of managed assets
- 0.60% on the next \$2,000,000 of managed assets
- 0.50% on the next \$2,000,000 of managed assets
- 0.40% on the next \$2,000,000 of managed assets
- 0.35% on the next \$3,000,000 of managed assets



- Negotiable above \$10,000,000 of managed assets

The minimum annualized fee is \$3,000 or 1.5% of the account value, whichever is less. The fee is calculated at the end of each quarter by applying  $\frac{1}{4}$  of the annualized rate to the market value of the portfolio as displayed on the CWV Portfolio Appraisal at the end of each quarter.

CWV, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

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### **Billing**

Investment management fees are billed quarterly, in advance, meaning that we invoice the client at the beginning of the three-month billing period. Payment in full is expected upon invoice presentation. Fees are paid in one of two ways. The client can send a check directly to CWV or CWV will provide the client with a letter of authorization each quarter to submit to the custodian for payment. We do not do any automatic withdrawal of fees from client accounts based on direct debiting. We want the client to be fully aware of how much they are being charged for our service, and we feel this method achieves that goal.

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### **Termination**

A client may terminate the investment management agreement at any time by notifying CWV in writing. When the client has made an advance payment, CWV will refund any unearned portion of the advance payment.

CWV may terminate the aforementioned agreement at any time by notifying the client in writing. When the client has made an advance payment, CWV will refund any unearned portion of the advance payment.

In either case, the refund will be based on the quarterly fee being divided by a ninety-day quarter and then multiplied by the days remaining in the quarter.

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### **Other Fees**

The client is responsible for commissions and fees charged by a custodian or broker. For example, TD Ameritrade charges our institutional clients \$7.95 for stock, ETF, and closed-end fund trades. Client selected custodians will have different commission fees that may be more or less. On bond trades the commission is built into the difference between the buy & sell price at TD Ameritrade. Other client selected custodians may or may not charge an additional handling fee. CWV does not receive any compensation, in any form, from TD Ameritrade or any other custodian.

These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

## **Compensation for Employer Sponsored Retirement Plan Services**

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### **Fees**

CWV bases its investment management fees on a percentage of assets under management. Usual compensation to CWV per account is a continuing annual fee based on the following schedule.

The fee schedule is:

- 0.75% on the first \$1,000,000 of managed assets
- 0.70% on the next \$2,000,000 of managed assets
- 0.65% above \$3,000,000 of managed assets

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### **Billing**

There are no start-up or termination fees, and all fees listed above are subject to negotiation. The above fees are billed quarterly in arrears and are based on the account asset value on the last business day of the immediately preceding quarter. Fees are deducted directly from client accounts by the Record Keeper for the plan.

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### **Termination**

CWV services are guided by an Investment Management Agreement signed by both CWV and the Plan Sponsor. Either Clients or CWV may terminate their Agreement with verified receipt of 30-days written notice to the other party. Fees will be billed on a prorated basis for services provided up to the effective date of termination.

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### **Other Fees**

CWV's fees are in addition to brokerage commissions, transaction fees, and other related expenses, which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, record keepers, third party administrators, and other third parties. Mutual Funds and Exchange Traded Funds may also charge investment management fees, which are disclosed in the fund's prospectus. Such charges, fees, and commissions are exclusive of CWV's fee, and CWV shall not receive any portion of these charges, fees, and commissions.

## Performance-Based Fees

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### Sharing of Capital Gains

Fees are **not** based on a share of the capital gains or capital appreciation of managed securities.

CWV 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.

## Types of Clients

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### Description

CWV generally provides investment advisory services to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities, as well as, employer sponsored retirement plans.

Client relationships vary in scope and length of service.

## Account Minimums

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### Investment Advisory Services

CWV has no stated dollar amount of assets required to establish or maintain an account. However, CWV has adopted a fee schedule that includes a minimum annual fee. Clients receiving ongoing asset management services will be assessed a minimum annual fee of \$3,000 or 1.50%, whichever is less. Clients who pay the minimum may pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management. Therefore, CWV would discourage small amounts of assets by a single unrelated individual, as the minimum fee would be non-competitive or excessive.

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### Employer Sponsored Retirement Plan Services

CWV has no stated dollar amount of assets required to establish or maintain an account.

# Methods of Analysis, Investment Strategies and Risk of Loss

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## Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, economic analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, company press releases and the World Wide Web.

## Investment Strategies

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### Investment Advisory Services

The primary investment strategy used on client accounts is tactical asset allocation utilizing individual stocks, bonds, ETFs and some closed-end funds. It is an active management approach, where we monitor asset allocation of individual positions as well as sector weightings. We use a combination of value and “growth at a reasonable price” strategies in stock selection. We will also from time-to-time exit the market if we perceive heightened market risk based on our internal economic and technical analysis. Portfolios are globally diversified to control the risk associated with traditional markets.

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.

Other strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing (including covered options, uncovered options, or spreading strategies).

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### Employer Sponsored Retirement Plan Services

The primary investment strategy used on client (plan sponsor) accounts is integrated asset allocation utilizing managed model portfolios, invested in low expense ETF's and Mutual Funds with high return-to-risk ratios. Integrated asset allocation combines both economic expectations and risk-tolerance profiles to create an array of individual model portfolios from conservative to aggressive in both objective and style. All model portfolios are globally diversified and actively managed to match their stated goals, time horizon, and risk tolerance. CWV monitors the asset allocations within each model portfolio and may adjust the individual assets and/or weightings as market conditions change.

CWV recognizes the importance of managing risk by minimizing volatility relative to return, through a globally diversified blend of assets that minimize correlation. Our model portfolios are constructed with a mix of highly efficient assets, exhibiting historical characteristics of high return-to-volatility and low expense ratios.

We will also from time-to-time reduce overall exposure to the market if we perceive heightened market risk based on our internal economic and technical analysis.

The specific investment strategy for each client is based on the Investment Policy Statement (IPS) for the plan. The IPS reflects the overall investment objectives, policies, constraints and risk tolerances of the client's plan. The IPS is co-developed with the client during consultations and becomes the guiding document from which all investment decisions are made. The client may change these objectives at any time.

CWV provides educational support to assist plan participants in determining the most appropriate model portfolio for their financial situation.

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## **Risk of Loss**

All investment programs have certain risks that are borne by the investor. 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 dollar today will not buy as much as a dollar next year 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's 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.

## **Disciplinary Information**

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### **Legal and Disciplinary**

CWV and its employees have never been involved in legal or disciplinary events related to past or present investment clients since the firm's inception in 1970.

## **Other Financial Industry Activities and Affiliations**

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### **Financial Industry Activities**

CWV is registered as a Registered Investment Advisor only.

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### **Affiliations**

CWV has no affiliations with any other firm or entity.

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

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### **Code of Ethics**

The president of the firm, Scott B. Williams, is a CFA & CFP. Therefore the Certified Financial Planner Code of Ethics as well as the Chartered Financial Analyst Code of Ethics for Asset Managers has been adopted by the firm. Each Association's Code of Ethics is available to clients or prospective clients upon request.

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### **Participation or Interest in Client Transactions**

CWV and its employees may buy or sell securities that are also held by clients. CWV or its employees will not purchase or sell any security until the following criteria are met:

- The purchase or sale of a security must be approved by the Chief Compliance Officer of CWV before the trade is executed.
- CWV or its employees may never be the first to purchase or sell a security unless the security is determined to be too risky for all clients. In that case, the security is barred from all client accounts.
- CWV or its employees may only buy securities recommended to clients after five clients have purchased the security or 30 days after the first client purchase, whichever occurs first.
- CWV or its employees may only sell securities recommended for disposal to clients after at least one client has disposed of the security.

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### **Personal Trading**

The Chief Compliance Officer of CWV is Scott B Williams, CFA, CFP. He reviews all employee trades each quarter. His trades are reviewed by Kent Stone. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment.

## **Brokerage Practices**

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### **Selecting Brokerage Firms**

CWV does not have any affiliation with product sales firms. Specific custodian recommendations are made to clients based on their need for such services. CWV recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

CWV recommends discount brokerage firms (qualified custodians), such as TD Ameritrade.

CWV does not receive fees or commissions from any of these arrangements.

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### **Best Execution**

CWV reviews the execution of trades at each custodian as confirmations are received. Trading fees charged by the custodians is also reviewed on a quarterly basis. CWV does not receive any portion of the trading fees.

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**Soft Dollars**

CWV does not receive soft dollars from any custodian.

## **Periodic Review of Accounts**

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**Investment Advisory Services**

Reviews take place in numerous ways on a continuing basis. The "Portfolio Appraisal" is generated on a monthly basis. This report shows the portfolio total value by asset and asset class, lists the top ten holdings of the portfolio, and displays performance for various periods and compares this performance to several indexes. Daily review of price changes for major holdings is another review procedure. When financial reports and/or corporate reports are published, individual positions are reviewed to make sure our growth and/or income assumptions are still valid. We also conduct an ongoing fundamental and/or technical analysis of the political, psychological, economic, corporate, and stock market trends to assist the reviewer in determining current market risk assumptions and how that risk relates to each individual client and their goals and risk tolerances.

The reviewers are the four CWV directors named herein. One is a co-founder and has over 40 years of experience as a financial analyst. The second is a principal, who is a Chartered Financial Analyst and Certified Financial Planner with over 16 years of experience. The third is a portfolio manager with over 20 years of experience. The fourth is a principal, who is second level CFA candidate with over 3 years of experience. Each reviewer is assigned the task of general research of the economy, the market, investment opportunities therein, and how these relate to his assigned clientele. No specific areas or industries are assigned. This allows each reviewer to have a broad background to serve his clientele. CWV has arranged its facilities in such a manner that the reviewers have a continuous dialogue allowing research to be promptly disseminated and discussed among the reviewers. Therefore, ongoing research on existing client positions and/or new opportunities is, by design, a continuous process. However, it is the responsibility of each reviewer to apply this research to his assigned clientele taking all the client's goals, needs, and risk tolerances into consideration.

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**Review Triggers**

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.



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## **Regular Reports**

CWV provides a computer-generated Portfolio Appraisal report for each account on a monthly basis. The current format of the report displays all of the client's assets under management showing historic cost, current valuation, realized and unrealized gains and losses, expected income, current yields, actual income received and numerous performance comparisons.

On a quarterly basis, CWV publishes and sends to clients an "Economic & Market Outlook" report. This report details our analysis of the current economic climate and the current market climate for a macro approach. It does not name specific securities as not all securities are suitable for all accounts.

At the end of the year, additional reports are sent to the client with the January Statements which itemizes the capital transactions realized during the past twelve months.

These reports can also be generated on a fiscal year basis if the client has other than a calendar year for reporting. This report is generated to assist clients with their tax or other reporting requirements. Naturally, a new client would only receive a partial listing in the first year, depending on the account starting date.

Finally, for those clients, their accountants or their pension plan consultants who desire, a complete transaction ledger is available to assist in various tax or plan reporting requirements.

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## **Employer Sponsored Retirement Plan Services**

Reviews take place in numerous ways on a continuing basis. The "Model Portfolio Appraisal" is generated on a quarterly basis. This report shows the total performance of each model portfolio in relation to its stated objective, as defined in the IPS, and as compared to the agreed-upon benchmarks. Daily review of price changes for major holdings is another review procedure. When financial reports and/or corporate reports are published, individual positions are reviewed to make sure our growth and/or income assumptions are still valid. We also conduct an ongoing fundamental and/or technical analysis of the political, psychological, economic, corporate, and stock market trends to assist the reviewer in determining current market-risk assumptions and how that risk relates to each individual client and their goals and risk tolerances.

On a quarterly basis, CWV publishes and sends to clients an "Economic & Market Outlook" report. This report details our analysis of the current economic climate and the current market climate for a macro approach. It does not name specific securities as not all securities are suitable for all accounts.

## **Client Referrals and Other Compensation**

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### **Incoming Referrals**

CWV has been fortunate to receive many client referrals over the years. The referrals have come from current clients, estate planning attorneys, accountants, employees, personal friends of employees, and other similar sources. The firm does not compensate referring parties for these referrals.

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### **Referrals Out**

CWV does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them. Referrals are only given if the client requests one.

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### **Other Compensation**

CWV receives no other compensation from any source.

## **Custody**

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### **SEC “Custody”**

CWV does not take custody over any client account.

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### **Account Statements**

All assets are held at qualified custodians. That means the custodians provide account statements directly to clients at their address of record at least quarterly and usually monthly.

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### **Performance Reports**

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by CWV.

## **Discretionary Authority for Trading**

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### **Investment Advisory Services**

CWV accepts discretionary authority to manage securities accounts on behalf of clients. CWV has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, CWV attempts to consult with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

The client approves the custodian to be used and the commission rates paid to the custodian. CWV does not receive any portion of the transaction fees or commissions paid by the client to the custodian.

Discretionary trading authority facilitates placing trades in client accounts on their behalf so that CWV may promptly implement the portfolio changes that they have approved if blanket trading authorization has not been agreed to.

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### **Employer Sponsored Retirement Plan Services**

CWV accepts discretionary authority to manage Model Portfolios on behalf of clients within the guidelines established in the IPS. CWV has the authority to determine, without obtaining specific client consent, the individual assets to be bought or sold, as well as the amount of the assets to be bought or sold.

CWV agrees to inform clients when material changes have been made to any Model Portfolio and to share the primary reasons for the modifications. CWV strives to maintain an open, transparent, and informative approach with all clients throughout the investment management process.

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### **Limited Power of Attorney**

A limited power of attorney is a trading authorization for this purpose. If a client has a discretionary account with CWV, they sign a limited power of attorney so that CWV may execute the trades in client accounts.

## **Voting Client Securities**

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### **Proxy Votes**

CWV does not vote proxies on securities and we recommend that clients do not vote their own proxies.

When assistance on voting proxies is requested, CWV will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

## **Financial Information**

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### **Financial Condition**

CWV does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because CWV does not serve as a custodian for client funds or securities, and does not require prepayment of fees six months or more in advance.

# Business Continuity Plan

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## General

CWV has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services, or key people.

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## Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident, and aircraft accident. Electronic files are backed up daily and archived offsite.

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## Loss of Key Personnel

The portfolio managers of CWV share information about clients amongst themselves so that any of the managers could take over a client's account in the event of serious disability or death of one of the portfolio managers.

# Information Security Program

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## Information Security

CWV maintains an information security program to reduce the risk that client personal and confidential information may be breached.

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## Privacy Notice

CWV is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect may include information about personal finances, information about health to the extent that it is needed for the investment management process, and information about transactions between the client and third parties. We use this information to help our clients meet their personal financial goals.

With client permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom the client has established a relationship. Our client may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With client permission, we share a limited amount of information about them with their brokerage firm in order to execute securities transactions on their behalf.

We maintain a secure office to ensure that client information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques, and authentication procedures in our computer environment.

We do not provide client personal information to mailing-list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to client personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and client personal records as permitted by law.

Personally identifiable information about clients will be maintained while they are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify clients in advance if our privacy policy is expected to change. We are required by law to deliver this Privacy Notice to clients annually, in writing.

## **Brochure Supplement (Part 2B of Form ADV)**

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### **Education and Business Standards**

CWV requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of security analysis and portfolio management or at least 10 years of prior professional experience in the investment advisory profession. Examples of acceptable coursework include: an MBA, a CFP, a CFA, or CPA. CWV also requires a business background that shows the individual to possess very high moral and ethical standards exemplifying the trust that clients desire in an investment advisory relationship.

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### **Professional Certifications**

Employees have earned certifications and credentials that are required to be explained in further detail.

**Certified Financial Planner (CFP):** Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board ([www.cfp.net](http://www.cfp.net)).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

Chartered Financial Analyst (CFA): Chartered Financial Analysts are licensed by the CFA Institute to use the CFA mark. CFA certification requirements:

- Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.
- Successful completion of all three exam levels of the CFA Program.
- Have 48 months of acceptable professional work experience in the investment decision-making process.
- Fulfill society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by applicant sponsors.
- Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.

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**Scott B Williams, CFA, CFP**

Educational Background:

- Date of Birth: 6/30/1960
- San Diego State University – BS Finance – 1987
- Int'l Board of Certified Financial Planners – CFP Designation – 1995
- Institute of Chartered Financial Analysts – CFA Charter - 1998

Business Experience:

- Clutinger, Williams & Verhoye, Inc. – Principal & Portfolio Manager (1995-Present)
- Full time Officer & Director of CWV since June 1997

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

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**Thomas H. Clutinger**

Educational Background:

- Date of Birth: 9/21/1939
- San Diego State University – BA Economics – 1963
- San Diego State University – MS Economics & Finance - 1968

Business Experience:

- Clutinger, Williams & Verhoye, Inc. – Co-Founder & Portfolio Manager (1970-Present)
- Full time Officer & Director of CWV since September 1970

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

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### **Kent E. Stone**

Educational Background:

- Date of Birth: 2/1/1964
- University of California, Berkley – BA Social Science - 1986

Business Experience:

- Clutinger, Williams & Verhoye, Inc. – Portfolio Manager (2008-Present)
- Full time Officer & Director of CWV since June 2010
- Stone Asset Management – Principal & Portfolio Manager (2000-2008)
- Alexander & Muckermann – Portfolio Manager & Officer Manager (1988-2000)

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Kent E. Stone is supervised by Scott B. Williams, Principal. He reviews Kent E. Stone's work through frequent office interactions.

Supervisor's contact information

(619) 326-0900

sbwcwv@aol.com

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### **Thomas M. Clutinger**

Educational Background:

- Date of Birth: 9/1/1960
- Brooks Institute – Bachelor of Arts – 1988
- CFA Level II Candidate

Business Experience:

- Clutinger, Williams & Verhoye, Inc. – Principal & Portfolio Manager (2010-Present)
- Full time Officer & Director of CWV since June 2012
- Inspired Sciences – CEO (2005-2009)
- Neatnix Organizers – General Manager (1989-2004)

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Thomas M. Clutinger is supervised by Thomas H. Clutinger. He reviews Thomas M. Clutinger's work through frequent office interactions.

Supervisor's contact information

(970) 259-1714

sdclutinger@q.com