



CONCENTRIC WEALTH MANAGEMENT LLC

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Firm Brochure

(Form ADV Part 2A)

March 21, 2014

This brochure provides information about the qualifications and business practices of Concentric Wealth Management LLC. If you have any questions about the contents of this brochure, please contact us at 925-962-1100 or info@concentric-wealth.com. The information in this brochure has not been approved or verified by the US Securities and Exchange Commission or by any state securities authority.

Additional information about Concentric Wealth Management LLC also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 144773.

Material Changes

This section is used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information.

Consistent with US Securities and Exchange Commission rules, we will ensure that you receive a summary of any material changes to this and subsequent Firm Brochures within 120 days of the close of our fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

You may request a complete copy of our Firm Brochure at any time by contacting us at 925-962-1100 or info@concentric-wealth.com.

Summary of Material Changes:

- Updated assets under management shown under *Advisory Business* section to reflect assets managed as of December 31, 2013.

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Advisory Business

Concentric Wealth Management LLC ("Concentric") provides integrated wealth management services, including financial planning and investment management, to individuals, trust and estates, pension and profit sharing plans, and business entities.

Financial Planning: Concentric reviews the client's financial objectives and develops financial planning strategies for the client. Financial planning may include financial statement preparation, cash flow analysis, wealth building projections, retirement planning, investment planning, tax strategies, college funding strategies, charitable planning, insurance reviews, or estate planning.

Investment Management: Concentric provides discretionary management of all assets in the client's brokerage accounts. Services include asset allocation guidance, selection and ongoing management of investments, quarterly reporting of holdings, performance measurement, and tax reporting.

Concentric tailors investment portfolios to meet the client's unique goals and objectives, tolerance for risk, time horizon, tax status, income requirements and liquidity needs. Portfolios are diversified across a broad range of asset classes, including US Large Cap, US Small/Mid Cap, Real Estate, International, Alternative Investments and Fixed Income. Securities used in portfolio construction include common stocks, mutual funds, exchange traded funds, real estate investment trusts and various fixed income instruments (e.g. municipal bonds, corporate bonds, preferred stocks, government bonds and certificates of deposit). Our investment selections are not limited to any specific product or service offered by a broker-dealer or insurance company. Clients can place reasonable restrictions on Concentric's investment discretion by providing us with written instructions.

Concentric was founded in 2008 by Eric Flett and Stewart McGuire, who each retain 50% ownership in the firm.

As of December 31, 2013, we were actively managing \$170,385,000 on a discretionary basis.

Fees and Compensation

Our fee for ongoing wealth management services, including financial planning and investment management, is based on the following schedule:

<u>Assets Under Management</u>	<u>Annual Fee</u>
First \$2 Million	0.95%
\$2 Million to \$5 Million	0.75%
\$5 Million to \$10 Million	0.65%
Over \$10 Million	Negotiable

Management fees are billed quarterly, in advance, based upon the market value of the assets managed at the end of the preceding calendar quarter. The initial fee will be pro-rated based upon the starting date for management of the portfolio.

Concentric generally requires initial minimum assets of \$1,000,000 for management (a minimum annual fee of \$9,500). At our discretion, we may waive this minimum or negotiate a different fee schedule based on the nature of the client's account. The exact fee schedule will be approved by the client in their advisory agreement at the inception of the relationship.

A billing statement containing the fee calculation is provided by Concentric to the client at least quarterly. For convenience, most of our clients choose to have their management fee deducted directly from a designated brokerage account at their qualified custodian; however, in some cases we will agree to invoice the client so that they may pay by check.

In lieu of an asset-based fee, we may charge an annual retainer fee, which is billed quarterly, in advance, based upon an evaluation of the work involved. The amount of the retainer will be specified in the client's advisory agreement at the inception of the relationship and may be adjusted periodically with advance, written notice to the client. At our discretion, we may also work with clients on a project basis. This work is billed at a rate of \$300 to \$500 per hour and payment is due upon completion of the work.

The advisory agreement may be canceled at any time, by either party, for any reason upon receipt of 10 days written notice. As disclosed above, fees are paid in advance for services to be provided. Upon termination of an account, any prepaid, unearned fees will be promptly refunded. In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period.

In addition to our management fee, clients may incur transaction charges for trades executed in their accounts. These charges are separate from our fees and will be disclosed by the brokerage firm through which the trades are executed. Clients may also pay separate expenses imposed by any mutual fund or exchange traded fund held in their accounts. We do not receive any portion of these expenses, which are disclosed in greater detail in the fund prospectus.

Performance-Based Fees

Concentric does not charge performance-based fees.

Types of Clients

Concentric's clients include individuals, trust and estates, pension and profit sharing plans, foundations and charities, and business entities. Concentric generally works with clients with investment portfolios in the amount of \$1,000,000 or more. We may waive this minimum at our discretion.

Methods of Analysis, Investment Strategies and Risk of Loss

Investment Strategies

Concentric develops individualized investment strategies for each of our clients after consideration of their unique goals and objectives, tolerance for risk, time horizon, tax status, income requirements and liquidity needs. The common elements of these strategies include a long-term orientation, diversification, low turnover (or trading activity), and tax-efficiency.

Methods of Analysis

Concentric conducts its own internal research and analysis on the securities recommended for client accounts. We use the following methods of analysis:

Fundamental Analysis – We attempt to measure the intrinsic value of a security by analyzing real data, including overall economic and company-specific information, so that we can determine if the security is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Technical Analysis – We analyze historical market data and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

We supplement our internal research with third-party sources, especially for economic data and analysis, industry perspectives, and valuation techniques. We value independence, integrity and objectivity in all of our research.

Mutual funds, exchange traded funds and real estate investment trusts are selected based on our familiarity and comfort with the manager's investment approach, types of securities utilized by the manager, long-term track record, expense ratio, and the needs of our portfolios for specific types of investment exposure (for example, exposure to a particular asset class like US Small Cap).

Bonds are selected with consideration of prevailing interest rates, Fed monetary policy, relative valuation among sectors of the bond market, issuer credit quality, and the needs of our portfolios for specific types of income (for example, tax-free income from municipal bonds).

Investment Risks

All investing involves some risk and may result in losses, to varying degrees, over short or even long periods of time. We ask each client to help us understand their tolerance for risk and ability to withstand losses. Diversification is a key tenet of our investment strategies and has historically served to reduce the risk and volatility of investment portfolios.

When we purchase a security, we generally intend to hold it for a period of at least 2 to 3 years and potentially longer. We sell a security when its market price reaches our assessment of the intrinsic value. In the short-term, prices may be driven more by the overall market than underlying fundamentals. In addition, fundamentals can change over time and there remains the risk that the market price of a security will not reach our target price.

Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell and certain publicly-available sources of information about these securities are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no disciplinary events to disclose.

Other Financial Industry Activities and Affiliations

Concentric is independently owned and unaffiliated with any other financial institution or securities dealer or issuer.

We recommend Charles Schwab & Co, Inc. ("Schwab"), a Financial Industry Regulatory Authority (FINRA) registered broker-dealer and member of the Securities Investors Protection Corporation (SIPC), to maintain custody of clients' assets and to effect trades for their accounts. Our recommendation is based on our evaluation of their custodial and brokerage capabilities, and we do not receive any compensation for recommending Schwab. See the *Brokerage Practices* section for additional details.

Although we may refer our clients to other professionals such as attorneys and accountants for estate planning, tax or other matters, neither Concentric nor its principals or employees are affiliated with any law or accountancy firm. Furthermore, we do not receive any compensation for these referrals.

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 employees, including compliance with applicable federal securities laws.

Concentric and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

The Code of Ethics is based on the following core principles: (1) the interests of our clients come before those of the firm or its employees, (2) each employee must avoid any actual or potential conflict between their or the firm's interests and the interests of our clients, and

(3) no employee shall take inappropriate advantage of their position of trust with clients and the firm.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Concentric's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

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 info@concentric-wealth.com, or by calling us at 925-962-1100.

Our Code of Ethics is designed to ensure that the personal securities transactions, activities and interests of our employees 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.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related persons may have an interest or position in securities which may also be recommended to a client.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction being implemented for an advisory account, thereby preventing employees from benefiting from transactions placed on behalf of advisory accounts.

We may aggregate employee trades with client transactions where possible and when compliant with our duty to seek best execution for our clients. In these instances, participating accounts will receive an average share price and transaction costs will be shared equally and on a pro-rata basis. In the instances where there is a partial fill of a particular batched order, we will allocate all purchases pro-rata, with each account paying the average price. Our employee accounts will be excluded in the pro-rata allocation.

Brokerage Practices

Recommended Custodian and Broker

We recommend Charles Schwab & Co, Inc. ("Schwab"), a Financial Industry Regulatory Authority (FINRA) registered broker-dealer and member of the Securities Investors Protection Corporation (SIPC), to maintain custody of clients' assets and to effect trades for their accounts. Our recommendation is based on our evaluation of their custodial and brokerage capabilities,

and we do not receive any compensation for recommending Schwab. Although we recommend that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. Concentric is independently owned and operated and not affiliated with Schwab.

Schwab provides Concentric 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 advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab, but are not otherwise contingent upon our firm committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For our client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Research and Other Benefits

Schwab makes available to our firm other products and services that benefit Concentric but may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our client accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist us in managing and administering our clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of our fees from clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services may include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers.

Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to Concentric. Schwab may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm. Schwab may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend or require that clients custody their assets at Schwab, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

The foregoing benefits provided by Schwab are not dependent on the commitment of any specific level of trading activity or brokerage commissions in our client accounts.

Best Execution

Consistent with its fiduciary obligations, Concentric seeks best execution in all transactions on behalf of its clients. Concentric defines best execution as the best price and overall terms it believes it may obtain for trades in light of all relevant circumstances. Factors evaluated in selecting broker-dealers include: ability to obtain best price, knowledge of markets and securities, commission structure, financial condition, trading technology and operational efficiency, recordkeeping, and service and reliability.

Brokerage for Referrals

Concentric does not compensate Schwab or any other custodian or broker dealer for referring client accounts to us.

Directed Brokerage

From time to time, clients may instruct Concentric to direct trades to a specific broker-dealer. In these situations, the client may forego any benefit from savings on execution costs that Concentric could obtain for other clients, such as negotiating volume discounts on bunched orders. The client may not receive the same price or commission paid by other clients who utilize different brokers. And the client's trades will generally be placed after fully discretionary trades of other client accounts.

Block Trades

Concentric will block trades where possible and when advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts, so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block. Block trading may allow us to execute equity trades in a timelier, more equitable manner, at an average share price, across multiple client accounts.

Trade Errors

Concentric requires that its personnel carefully implement investment management decisions. Nevertheless, if a trade error occurs, it is Concentric's policy that the error be corrected as soon as possible and in such a manner that the affected client is not disadvantaged and bears no loss.

Concentric's policy prohibits its staff from requesting a broker-dealer to accept financial responsibility for a trade error caused by Concentric's personnel in exchange for the promise of future compensation through commissions.

Review of Accounts

Reviews of investment accounts are conducted on a quarterly basis or more frequently depending on market conditions and changes in client circumstances. Additional reviews may be triggered by changes in the client's goals and objectives, income and expenses, tax situation, family status, gifts and inheritance, health developments, or any other material changes in the client's life. Reviews are conducted by one of the firm's principals, either Eric Flett or Stewart McGuire.

With respect to advisory clients who have written financial plans, we will review these plans with the client during regular review meetings in our office. Plans are updated when there has been a material change in the client's circumstances, similar to those noted above for account reviews.

We provide quarterly written reports to our clients. These reports summarize the overall portfolio allocation, show the details of individual securities held, and provide portfolio-level performance over multiple time periods. They also include our review and outlook for the financial markets and the global economy, updates on our portfolio strategy, and financial planning articles of general interest to our clients. In addition, for clients with taxable accounts under our management, we may provide annual reports detailing transactions for tax reporting purposes.

Client Referrals and Other Compensation

It is Concentric's policy not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm.

Concentric does not accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

Custody

We previously disclosed in the *Fees and Compensation* section that our firm directly deducts advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from each client account. On at least a quarterly basis, the custodian is required to send to the client 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 clients to carefully review their billing statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there is an error in the calculation of their fee.

In addition to the periodic statements that clients receive directly from their custodians, we also send account statements to our clients on a quarterly basis. We urge our clients to carefully compare the information provided on these statements to ensure that all account transactions, holdings and values are correct and current.

Concentric does not maintain physical custody of client funds or securities and has a policy expressly forbidding any employee from accepting such custody.

Investment Discretion

Concentric generally requires that clients grant us full trading and investment discretion over their accounts. Discretionary authority is granted under the client's advisory agreement with Concentric. In addition, clients are required to sign a limited power of attorney with their custodian (generally Schwab) authorizing Concentric to place trades on their behalf.

Concentric is responsible for selecting the securities to be bought and sold in the client's accounts, the amount of those securities, the timing of their purchase, and the broker-dealer to be used in the transaction. Clients can place reasonable restrictions on Concentric's investment discretion by providing us with written instructions.

Voting Client Securities

As a matter of firm policy, Concentric does not vote proxy solicitations or other shareholder actions received on behalf of clients from the issuers of securities held in their account. Custodians are instructed to direct all such solicitations to clients, who maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients may contact Concentric to discuss any questions they may have regarding a particular solicitation.

Financial Information

As an advisory firm that maintains discretionary authority for client accounts, we are required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. Concentric has no additional financial circumstances to report.

Concentric does not require or solicit prepayment of management fees from clients six months or more in advance.

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

Privacy Policy

At Concentric Wealth Management LLC, we value your trust and are committed to earning it each day through all of our actions. This commitment includes our promise to maintain the confidentiality, integrity and security of the personal information you entrust to us.

The broad scope of the services we provide requires us to collect a variety of personal information from our clients. In addition to the information commonly provided on brokerage account applications, we often collect balance sheet, cash flow, investment, tax, insurance and estate planning information.

To safeguard the confidentiality of this information, we limit employee access to only those who need it to perform their jobs. We maintain a secure office and computer network environment to minimize the risk of unauthorized access to confidential information.

We may contract with unaffiliated third party service providers who provide essential services to our clients. These service providers include custodians like Charles Schwab & Co. In all cases the service providers are required to protect your confidential information by both the terms of our agreements with them and by law. Additionally, we frequently coordinate the activities and advice of other advisors working with our clients. Performing this function requires the exchange of confidential information with those other advisors. Information disclosure is limited to that which is necessary to plan, affect, administer or enforce the transaction this has been requested or authorized by the client. Clients may opt out from our sharing information with these parties; however, in doing so, they may impact the range and quality of services we can provide.

Federal and state securities regulators may review our company records and your personal information as permitted by law.

We do not provide any information to mailing list vendors or solicitors for any purpose.

Personally identifiable information about you will be maintained while you 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 want our clients to understand our commitment to their privacy and our use of personal information. If you have any questions or concerns about our Privacy Policy, please do not hesitate to contact us.



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Brochure Supplement

(Form ADV Part 2B)

March 21, 2014

This brochure supplement provides information about our professional staff that supplements the Concentric Wealth Management LLC brochure. You should have received a copy of that brochure. Please contact us at 925-962-1100 or info@concentric-wealth.com if you did not receive this brochure or if you have any questions about the contents of this supplement. The information in this brochure has not been approved or verified by the US Securities and Exchange Commission or by any state securities authority.

Additional information about our professional staff is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 144773.

Education and Business Standards

Concentric Wealth Management requires advisors who provide advice to clients to have a Bachelor's degree. In addition, advisors must have 10 years of financial industry experience or have one of the following professional designations: Certified Financial Planner (CFP), Chartered Financial Analyst (CFA), or Certified Public Accountant (CPA).

Professional Certifications

The certifications and credentials our advisors may hold, including requirements for obtaining those credentials, are listed below:

Certified Financial Planner (CFP)

Certified Financial Planner practitioners are licensed by the CFP Board to use the CFP mark. CFP certification requirements include:

- Bachelor's degree from an accredited college or university;
- Completion of the financial planning education requirements set by the CFP Board;
- Successful completion of the 10 hour CFP® Certification Exam;
- Three years qualifying full-time work experience; and
- Successfully pass the Candidate Fitness Standards and a background investigation.

Chartered Financial Analyst (CFA)

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

- Bachelor's degree from an accredited institution or equivalent education or work experience;
- Successful completion of all three exam levels of the CFA Program;
- Forty-eight months of acceptable professional work experience in the investment decision making process;
- Fulfill CFA Society requirements, which vary by CFA Society. Unless upgrading from affiliate membership, all CFA Societies require two sponsor statements; and
- Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.

Certified Public Accountant (CPA)

Certified Public Accountants are licensed by the state. CPA certification requirements include:

- Bachelor's degree from an accredited college or university;
- Achieve 24 semester units in accounting-related subjects;
- Achieve 24 semester units in business-related subjects;
- Passing the 14 hour Uniform CPA Exam;
- Two years of general accounting experience supervised by a CPA with an active license; and
- Passing an approved ethics course.

Eric Flett

Eric serves as Concentric's Chief Executive Officer (CEO) and provides broad oversight and leadership to achieve the firm's mission and vision. As a senior-level advisor, Eric works with business owners, executives and professionals developing financial plans and investment strategies.

Born: 1965

Educational Background:

- University of California at Berkeley; BA in Social Sciences; 1988

Business Experience:

- Concentric Wealth Management LLC; CEO/Member and Wealth Manager; 2008 to Present
- First Republic Investment Management (and predecessor firms); Managing Director and Portfolio Manager, 2000 to 2008
- Gemmer Asset Management; Portfolio Manager, 1992 to 2000

Professional Designations: None

Disciplinary Information: Concentric is required to disclose all material facts regarding any legal or disciplinary event that would be material to your evaluation of each investment person providing advice to you. Eric has no information required to be disclosed under this item.

Other Business Activities: None

Additional Compensation: None

Supervision: Stewart McGuire, our firm's Chief Compliance Officer, oversees compliance-related activities for all employees, including Eric. Stewart reviews Eric's advisory work through frequent office interactions. He also monitors the activities of the entire firm through our client relationship management system and regular review of management reports. Stewart can be reached at 925-962-1100.

Stewart McGuire

Stewart serves as Concentric's Chief Investment Officer (CIO), coordinates the firm's research and directs the efforts of the investment committee. As a senior-level advisor, he also works closely with clients on the development and implementation of financial plans.

Born: 1967

Educational Background:

- University of California at Berkeley - Haas School of Business; MBA in Finance; 1999
- University of San Francisco; BS, Business - Information Systems; 1989

Business Experience:

- Concentric Wealth Management LLC; CIO/Member and Wealth Manager and Chief Compliance Officer; 2008 to Present
- HC Financial Advisors Inc.; Vice President and Advisor; 2000 to 2008
- Hutchinson Capital Management; Director of Research; 1999 to 2000

Professional Designations:

- Chartered Financial Analyst (CFA); 2000
- Certified Financial Planner (CFP); 2004

Disciplinary Information: Concentric is required to disclose all material facts regarding any legal or disciplinary event that would be material to your evaluation of each investment person providing advice to you. Stewart has no information required to be disclosed under this item.

Other Business Activities: None

Additional Compensation: None

Supervision: Eric Flett, our firm's Chief Executive Officer, oversees compliance-related activities for Stewart. Eric reviews Stewart's advisory work through frequent office interactions. He also monitors the activities of the entire firm through our client relationship management system and regular review of management reports. Eric can be reached at 925-962-1100.