

# Wrap Fee Program Brochure

May 9, 2014

## The Zappia Family Wealth Management Program

Sponsored By



This brochure provides information about the qualifications and business practices of LVW Advisors, LLC d/b/a Zappia Family Wealth (hereinafter "ZFW" or the "Firm"). If you have any questions about the contents of this brochure, please contact the Firm at the telephone number listed below. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about the Firm is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The Firm is an SEC registered investment adviser. Registration does not imply any level of skill or training.

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**Item 2.     Material Changes**

This Item discusses only the material changes that have occurred to the Wrap Brochure since ZFW's last annual update. As this is ZFW's initial Wrap Fee Brochure, there is no such information to disclose in relation to this Item.

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## Item 4. Services, Fees and Compensation

The Zappia Family Wealth Management Program (the “Program”) is an investment advisory program sponsored by LVW Advisors, LLC d/b/a Zappia Family Wealth, a federally registered investment adviser that has been in business since October 2011.

This Wrap Fee Brochure describes the business of ZFW as it relates to clients receiving services through the Program. Certain sections also describe the activities of the Firm’s *Supervised Persons*, which refer to any officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees, or other persons who provide investment advice on ZFW’s behalf and are subject to the Firm’s supervision.

In addition to the Program, the Firm also provides financial planning, consulting, and investment management services under different arrangements than those described in this brochure. Information about these services is contained in ZFW’s Disclosure Brochure.

### Description of the Program

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The Program is offered as a wrap fee program, which provides clients with the ability to trade in certain investment products without incurring separate brokerage commissions or transaction charges. A wrap fee program is considered any arrangement under which clients receive investment advisory services (which may include portfolio management or advice concerning the selection of other investment advisers) and the execution of their transactions for a specified fee.

Prior to engaging ZFW to provide services through the Program, the client is required to enter into a written agreement with ZFW setting forth the terms and conditions under which ZFW renders its services (the “*Agreement*”). Clients must also open a new securities brokerage account and complete a new account agreement with Charles Schwab & Co., Inc. (“*Schwab*”) or another broker-dealer ZFW approves under the Program (collectively “*Financial Institutions*”).

At the onset of the Program, clients complete an investor profile describing their individual investment objectives, liquidity and cash flow needs, time horizon and risk tolerance, as well as any other factors pertinent to their specific financial situations. After an analysis of the relevant information, ZFW assists its clients in developing an appropriate strategy for managing their assets. Clients’ investment portfolios are generally managed on a discretionary or non-discretionary basis by ZFW’s investment adviser representatives and/or one or more independent investment managers (collectively “*Independent Managers*”), as selected by ZFW. ZFW generally allocates clients’ assets among the various investment products available under the Program, as described further in Item 6 (below). Depending on the engagement, ZFW may also provide clients with certain financial planning and/or consulting services.

## Fees for Participation in the Program

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Wealth management services are offered through the Program on a fee basis, meaning that clients pay a single annualized fee based upon assets under management. The Firm also offers advisory services outside of the Program under different fee arrangements than those discussed below.

ZFW's asset-based fee generally varies between 25 and 175 basis points (0.25 % – 1.75%), depending upon the size of a client's portfolio and the type of wealth management services provided.

This fee is prorated and billed quarterly in advance, based on the market value of the assets being managed by ZFW under Program on the last day of the previous quarter. If assets amounting to ten percent (10%) of a client's existing portfolio value are deposited into or withdrawn from an account after the inception of a billing period, the fee payable with respect to such assets is prorated to account for the change in portfolio value.

For the initial term of the Program, the fee is calculated on a *pro rata* basis. In the event the *Agreement* is terminated, the fee for the final quarter is prorated through the effective date of the termination and the outstanding balance is charged or refunded to the client, as appropriate.

## Fee Comparison

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A portion of the fees paid to ZFW are used to cover the securities brokerage commissions and transactional costs attributed to the management of its clients' portfolios. *Independent Managers* utilized in the Program may charge a separate and additional fee, which is generally incurred directly by the client.

Services provided through the Program may cost clients more or less than purchasing these services separately. The number of transactions made in clients' accounts, as well as the commissions charged for each transaction, determines the relative cost of the Program versus paying for execution on a per transaction basis and paying a separate fee for advisory services. Since ZFW will generally pay the transaction/executions costs associated with certain securities transactions, there is a conflict of interest because the Firm has a disincentive to trade securities. However, the Firm has procedures in place focused on ensuring that decisions are made in the best interests of its clients.

Fees paid for the Program may also be higher or lower than fees charged by other sponsors of comparable investment advisory programs.

## Fee Discretion

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ZFW, in its sole discretion, may negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client relationship, account retention and *pro bono* activities.

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## Fee Debit

The Firm's *Agreement* and the separate agreement with any *Financial Institutions* generally authorize ZFW and/or the *Independent Managers* to debit its clients' accounts for the amount of the Program fee and to directly remit that fee to ZFW or the *Independent Managers*. Any *Financial Institutions* recommended by ZFW have agreed to send statements to clients not less than quarterly indicating all amounts disbursed from the account, including the amount of Program fees paid directly to ZFW. Alternatively, clients may elect to have ZFW send them an invoice for payment.

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## Account Additions and Withdrawals

As state above, clients may make additions to and withdrawals from their account at any time, subject to ZFW's right to terminate an account. Additions may be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or decline to accept particular securities into a client's account. Clients may withdraw account assets on notice to ZFW, subject to the usual and customary securities settlement procedures. However, ZFW designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives. ZFW may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

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## Other Charges

Clients may incur certain charges imposed by third parties in addition to the Program fee. These additional charges may include fees charged by the *Independent Managers*, charges imposed directly by a mutual fund or exchange-traded fund ("ETF") in the account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), redemption fees, fees associated with alternative products, 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.

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## Additional Services

In limited circumstances, Program clients may request that ZFW provide advice on certain of their accounts that are not being actively managed through the Program. Depending on the services requested, ZFW may charge a fee for these services which will be negotiated with each client. Unlike the client's other accounts being managed through the Program, the client may incur separate securities brokerage commissions and transactional costs for these accommodation accounts.

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## Compensation for Recommending the Program

ZFW has no internal arrangements in place whereby persons recommending the Program are entitled to receive additional compensation as a result of clients' participation.

## Item 5. Account Requirements and Types of Clients

### Types of Clients

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Services through the Program are generally offered to high net worth families and individuals.

### No Minimum Account Requirements

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ZFW does not impose a stated minimum fee or minimum portfolio value for participation in the Program. Certain *Independent Managers* may, however, impose more restrictive account requirements and varying billing practices than ZFW. In these instances, ZFW may alter its corresponding account requirements and/or billing practices to accommodate those of the *Independent Managers*.

## Item 6. Portfolio Manager Selection and Evaluation

Clients' investment portfolios are managed either directly by ZFW or through the use of certain *Independent Managers*, as referenced above.

### Portfolio Management

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For accounts managed through the Program, ZFW primarily allocates assets on a discretionary or non-discretionary basis among various *Independent Managers*, mutual funds, ETFs, individual debt and equity securities and alternative asset classes, in accordance with the investment objectives of its individual clients. The Firm may also render advice about certain legacy holdings, concentrated stock positions or other types of investments held in its clients' portfolios, as necessary.

ZFW tailors its advisory services to accommodate the needs of its individual clients and continuously seeks to ensure that its clients' portfolios are managed in a manner consistent with their specific investment profiles. Clients are advised to promptly notify ZFW if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients may impose reasonable restrictions or mandates on the management of their accounts if ZFW determines, in its sole discretion, the conditions will not materially impact the performance of a portfolio strategy or prove overly burdensome to the Firm's management efforts.

In return for these services, ZFW retains a portion of the fees paid for participation in the Program, as described in Item 4.

### Selection or Recommendation of Independent Managers

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ZFW evaluates various information about the *Independent Managers* in which it recommends or selects to manage client portfolios under the Program. The Firm generally reviews a variety of different resources, which may include the *Independent Managers'* public disclosure documents, materials

supplied by the *Independent Managers* themselves, and other third-party analyses it believes are reputable. To the extent possible, the Firm seeks to assess the *Independent Managers'* investment strategies, past performance and risk results in relation to its clients' individual portfolio allocations and risk exposures. ZFW also takes into consideration each *Independent Manager's* management style, returns, reputation, financial strength, reporting, pricing and research capabilities, among other related factors.

ZFW generally monitors the performance of those accounts being managed by *Independent Managers* by reviewing the account statements and trade confirmations produced by the *Financial Institutions*, as well as other performance information furnished by the *Independent Managers* and/or other third-party providers. The Firm does not verify the accuracy of any such performance information and does not ensure its compliance with presentation standards. Clients are advised that any performance information they receive from the *Independent Managers* may not be calculated on a uniform and consistent basis. Clients should compare all supplemental materials with the account statements they receive from their respective custodians.

The terms and conditions under which the client engages an *Independent Manager* are set forth in a separate written agreement between ZFW or the client and the designated *Independent Manager*. In addition to this Wrap Fee Brochure, the client may also receive the disclosure brochure of the designated *Independent Managers* engaged to manage their assets.

### **Methods of Analysis and Investment Strategies**

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ZFW generally utilizes a combination of largely fundamental, technical and cyclical methods of analysis, while employing an asset allocation strategy based on a derivative of Modern Portfolio Theory ("MPT").

Fundamental analysis involves an evaluation of an issuer's fundamental financial condition and competitive position. ZFW generally analyzes the financial condition, capabilities of management, earnings capacity, new products and services, as well as the company's markets and position amongst its industry competitors in order to determine the recommendations made to clients. A substantial risk in relying upon fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.

Technical analysis involves the examination of past market data rather than specific company information in determining the recommendations made to clients. Technical analysis may involve the use of mathematical based indicators and charts, such as moving averages and price correlations, to identify market patterns and trends which may be based on investor sentiment rather than the fundamentals of the company. A substantial risk in relying upon technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that ZFW will be able to accurately predict such a reoccurrence.

Cyclical analysis is similar to technical analysis in that it involves the assessment of market conditions at a macro (entire market or economy) or micro (company specific) level, rather than focusing on the overall fundamental analysis of the health of the particular company that ZFW is recommending. The risks with cyclical analysis are similar to those of technical analysis.

MPT is a mathematical based investment discipline that seeks to quantify expected portfolio returns in relation to corresponding portfolio risk. The basic premise of MPT is that the risk of a particular holding is to be assessed by comparing its price variations against those of the market portfolio. However, MPT disregards certain investment considerations and is based on a series of assumptions that may not necessarily reflect actual market conditions. As such, the factors for which MPT does not account (e.g., tax implications, regulatory constraints and brokerage costs) may negate the upside or add to the actual risk of a particular allocation. Nonetheless, ZFW's investment process is structured in such a way to integrate those assumptions and real life considerations for which MPT analytics do not account.

### Risks of Loss

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#### *Mutual Funds and ETFs*

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed-based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.



### *Options*

Options allow investors to buy or sell a security at a contracted “strike” price (not necessarily the current market price) at or within a specific period of time. Clients may pay or collect a premium for buying or selling an option. Investors transact in options to either hedge (limit) losses in an attempt to reduce risk or to speculate on the performance of the underlying securities. Options transactions contain a number of inherent risks, including the partial or total loss of principal in the event that the value of the underlying security or index does not increase/decrease to the level of the respective strike price. Holders of options contracts are also subject to default by the option writer which may be unwilling or unable to perform its contractual obligations.

### *Use of Independent Managers*

As stated above, ZFW generally recommends the use of *Independent Managers* to its clients. The Firm will continue to do ongoing due diligence of such managers, but such recommendations rely, to a great extent, on the *Independent Managers’* ability to successfully implement their investment strategy. In addition, ZFW does not have the ability to supervise the *Independent Managers* on a day-to-day basis other than as previously described above.

### *Use of Private Collective Investment Vehicles*

As previously stated, ZFW may recommend the investment by certain qualified clients in privately placed collective investment vehicles (some of which may be typically called “hedge funds” or “fund of funds”). The managers of these vehicles will have broad discretion in selecting the investments. There are few limitations on the types of securities or other financial instruments which may be traded and no requirement to diversify. These funds may trade on margin or otherwise leverage positions, thereby potentially increasing the risk to the vehicle. In addition, because some of these vehicles are not registered as investment companies, there is an absence of regulation. There are numerous other risks in investing in these securities. The client will receive a private placement memorandum and/or other documents explaining such risks.

### *General Risk of Loss*

Investing in securities involves the risk of loss, including the potential loss of principal. Clients should be prepared to bear such loss. Past performance is no guarantee of future results.

### **Performance-Based Fees and Side-By-Side Management**

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ZFW does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client's assets) and therefore does not engage in side-by-side account management.

## Voting of Client Securities

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ZFW generally does not accept the authority to vote a client's securities (i.e., proxies) on their behalf. Clients receive proxies directly from the *Financial Institutions* where their assets are custodied and may contact the Firm at the contact information on the cover of this brochure with questions about any such issuer solicitations.

## Item 7. Client Information Provided to Portfolio Managers

Clients participating in the Program generally grant ZFW the authority to discuss certain non-public information with the *Independent Managers* engaged to manage their accounts. Depending upon the specific arrangement, the Firm may be authorized to disclose various personal information including, without limitation: names, phone numbers, addresses, social security numbers, tax identification numbers and account numbers. ZFW may also share certain information related to its clients' financial positions and investment objectives in an effort to ensure that the *Independent Managers'* investment decisions remain aligned with its clients' best interests. This information is communicated on an initial and ongoing basis, or as otherwise necessary to the management of its clients' portfolios. Each client will receive the Firm's Privacy Policy Notice discussing the extent to which information is shared with outside parties.

## Item 8. Client Contact with Portfolio Managers

There are no restrictions on clients' ability to contact and consult with ZFW. Clients can generally contact the *Independent Managers* managing their portfolios through ZFW by providing the Firm with written request and identification of the questions or issues to be discussed with the *Independent Managers*. After receiving the client's written request, ZFW, at its sole discretion, may contact the *Independent Managers* for the client or arrange for the *Independent Managers* and the client to communicate directly.

## Item 9. Additional Information

### Disciplinary Information

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ZFW has not been involved in any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management.

## Other Financial Industry Activities and Affiliations

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### *Focus Financial Partners, LLC Affiliation*

ZFW is owned by Focus Financial Partners, LLC (“Focus”). Focus also controls other registered investment advisers, broker-dealers, pension consultants, insurance firms, and other financial services firms (the “Focus Partners”). The Focus Partners provide wealth management, benefit and investment consulting services, serving primarily individuals, families, employers, and institutions. Some Focus Partners also manage or advise limited partnerships, private funds or limited liability companies as disclosed on their respective Forms ADV. ZFW’s management does not feel that this relationship poses a material conflict to clients. The Focus Partners do not share client information amongst each other without prior consent, and management of the other Focus Partners is not involved in the services provided by ZFW. A list of all Focus affiliates will be provided upon request or can be found at [www.focusfinancialpartners.com](http://www.focusfinancialpartners.com).

ZFW has formed a strategic alliance with one of its affiliates, Bridgewater Wealth and Financial Management, LLC (“Bridgewater”), in order to make available services, such as tax/estate planning and accounting, share research and provide enhanced reporting capabilities to certain of its high net worth clients. In addition, a Bridgewater representative will maintain a non-voting seat on the Firm’s Investment Committee. Clients of the Firm may be referred to Bridgewater for certain advisory/non-advisory services and vice versa. The solicitor relationship was established and is maintained in accordance with the requirements of Rule 206(4)-3 of the Investments Advisers Act of 1940.

### *Licensed Insurance Agents*

Certain of the Firm’s *Supervised Persons* are licensed insurance agents and in such capacity may recommend, on a fully-disclosed commission basis, the purchase of certain insurance products. A conflict of interest exists to the extent that ZFW recommends the purchase of insurance products where the Firm receives insurance commissions or other additional compensation. ZFW seeks to ensure that all recommendations are made in the best interests of clients regardless of any additional compensation earned.

## Code of Ethics

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ZFW and persons associated with ZFW (“Associated Persons”) are permitted to buy or sell securities that it also recommends to clients consistent with ZFW’s policies and procedures.

ZFW has adopted a code of ethics that sets forth the standards of conduct expected of its associated persons and requires compliance with applicable securities laws (“*Code of Ethics*”). ZFW’s *Code of Ethics* contains written policies reasonably designed to prevent the unlawful use of material non-public information by ZFW or any of its associated persons. The *Code of Ethics* also requires that certain of ZFW’s personnel (called “*Access Persons*”) report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings.

When ZFW is engaging in or considering a transaction in any security on behalf of a client, no *Access Person* may effect for themselves or for their immediate family (i.e., spouse, minor children, and adults living in the same household as the *Access Person*) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the *Access Person* is completed as part of a batch trade with clients; or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

This *Code of Ethics* has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by *Access Persons* to be completed without any appreciable impact on the markets of such securities. Therefore, under certain limited circumstances, exceptions may be made to the policies stated above.

Clients and prospective clients may contact ZFW to request a copy of its *Code of Ethics*.

### Account Reviews

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ZFW monitors its clients' investment portfolios on a continuous and ongoing basis, and conducts regular account reviews at least quarterly. Such reviews are conducted by the Firm's investment adviser representatives. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with ZFW and to keep ZFW informed of any changes thereto. ZFW contacts ongoing investment advisory clients at least annually to review its previous services and recommendations, and to discuss the impact resulting from any changes in their financial situation and/or investment objectives.

### Account Statements and General Reports

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Clients are provided with transaction confirmation notices and regular summary account statements directly from the *Financial Institutions*. Clients in the Program also receive reports from time-to-time from ZFW that may include relevant account and/or market-related information, such as an inventory of account holdings and account performance. Clients should compare any supplemental reports they receive from ZFW and/or the *Independent Managers* with the summary account statements they receive from the *Financial Institutions*.

## Client Referrals

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ZFW has arrangements in place whereby the Firm provides compensation to an unaffiliated third-party for referring clients to the Firm. In the event a client is introduced to ZFW by a solicitor, ZFW may pay that solicitor a referral fee in accordance with applicable laws, rules and regulations. All referral fees are paid solely from ZFW's fee and do not result in any additional charges to the Firm's clients. In these situations, clients are advised of the solicitation relationship with ZFW and are provided with the appropriate Wrap Fee Brochure and/or Disclosure Brochure prior to or at the time the *Agreement* is executed. Additionally, any third-party solicitors who are not affiliated with ZFW also provide clients with a copy of the solicitor's disclosure statement containing the terms and conditions (including compensation) of the solicitation arrangement.

## Receipt of Economic Benefits

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ZFW has arrangements in place whereby the Firm receives economic benefits from one of more third parties for providing investment advice to clients participating in the Program. Specifically, these *Financial Institutions* may provide the Firm with computer software and related systems support, which allow ZFW to better monitor client accounts maintained at the respective *Financial Institutions*. ZFW may receive the software and related support without cost because ZFW renders investment management services to clients that maintain assets at these *Financial Institutions*. The software and related systems support may benefit ZFW, but not its clients directly. In fulfilling its duties to its clients, ZFW endeavors at all times to put the interests of its clients first. Clients should be aware, however, that ZFW's receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence ZFW's choice of broker-dealer over another that does not furnish similar software, systems support, or services.

## Products and Services Made Available Through Schwab

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*Schwab* provides ZFW and its clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to *Schwab*'s retail customers. In addition, *Schwab* also makes available various support services, which are provided by either *Schwab* directly or another third-party vendor. *Schwab* may discount or waive its fees for some of these services or pay all or a part of a third party's fees. Some of these services help ZFW manage or administer its clients' accounts, while others help the Firm manage and grow its business. *Schwab*'s support services are generally available on an unsolicited basis and at no charge to ZFW as long as the Firm maintains at least \$10 million of client assets in *Schwab* accounts. The specific support services provided by *Schwab* are as follows:

### *Services that Benefit the Client*

*Schwab*'s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available

through *Schwab* include some to which ZFW might not otherwise have access or that would require a significantly higher minimum initial investment.

### *Services that May Not Directly Benefit the Client*

*Schwab* also makes available other products and services that benefit ZFW but may not directly benefit all of the Firm's clients. These products and services, such as investment research, assist the Firm in managing and administering client accounts. ZFW may use this research to service all or a portion of its clients' accounts, including those not maintained at *Schwab*. In addition to investment research, *Schwab* may also make available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and accounts statements);
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- Provide pricing and other market data;
- Facilitate payment of advisory fees from client accounts; and
- Assist with back office functions, record-keeping and client reporting.

### *Services that Generally Benefit Only ZFW*

*Schwab* also offers other services intended to help ZFW manage and further develop its business enterprise. These services include:

- Educational conferences and events;
- Technology, compliance, legal and business consulting;
- Publications and conferences on practice management and business succession; and
- Access to employee benefits providers, human capital consultants and insurance providers.

## **Financial Information**

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ZFW is not required to disclose any financial information pursuant to this Item due to the following:

- The Firm does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance;
- The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.



*a Registered Investment Adviser*

Prepared by:



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