

Wisdom Planning, LLC

Brochure **Dated April 23, 2014**

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This brochure provides information about the qualifications and business practices of Wisdom Planning, LLC. If you have any questions about the contents of this brochure, please contact us at (215) 558-3500. 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 Wisdom Planning, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

References herein to Wisdom Planning, LLC as a “registered investment adviser” or any reference to being “registered” does not imply a certain level of skill or training.

Item 2 Material Changes

This is Wisdom Planning, LLC's initial disclosure statement.

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Item 4 Advisory Business

- A. Wisdom Planning, LLC (the “Registrant”) is a limited liability company formed in the State of Delaware on October 25, 2013. The Registrant became registered as an Investment Adviser Firm in November 2013. Stephen Cordasco is the sole owner and Managing Member of the Registrant.
- B. As discussed below, the Registrant offers to its clients (individuals, business entities, and trusts, etc.) financial planning and consultation services. Registrant **does not** provide investment supervisory or management services.

FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

To the extent it is specifically requested to do so, Registrant may provide its clients with financial planning and consultation services (including tax planning, tax preparation and other non-investment related matters). Prior to engaging the Registrant to provide financial planning and/or consultation services, the client will generally (i.e., depending upon the level and/or scope of services to be provided) be required to enter into a *Financial Planning Agreement* with Registrant setting forth the terms and conditions of the engagement, and describing the scope of the services to be provided. In performing its services, Registrant shall not be required to verify any information received from the client or from the client’s other professionals, and is expressly authorized to rely thereon. If requested by the client, Registrant may recommend the services of other professionals for implementation purposes, including certain of Registrant’s representatives in their individual capacities as licensed insurance agent. (*See* disclosure below at Items 10 C.1, 10 C.6 and 10 C.8). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the Registrant. Clients are encouraged to renew Registrant’s financial planning services on an annual basis for the purpose of reviewing/updating Registrant’s previous recommendations and/or services. **Please Note:** If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. **Please Also Note:** It remains the client’s responsibility to promptly notify the Registrant if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Registrant’s previous recommendations and/or services.

MISCELLANEOUS

Non-Investment Consulting/Implementation Services. If requested by the client, the Registrant may provide consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. Neither the Registrant, nor any of its representatives, serves as an attorney and no portion of the Registrant’s services should be construed as same. To the extent requested by a client, the Registrant may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance, etc.) including certain of the Registrant’s representatives in their separate licensed capacities as discussed below. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the Registrant. **Please Note:** If the client engages any such recommended professional, and a dispute arises thereafter relative to

such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. **Please Also Note:** It remains the client's responsibility to promptly notify the Registrant if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Registrant's previous recommendations and/or services.

Independent Managers. The Registrant **does not** provide investment supervisory or management services. Rather, in the event the client desires investment supervisory or management services, the Registrant may recommend that the client allocate his/her/its assets among other investment adviser(s) (the "*Independent Manager(s)*"), based upon the stated investment objectives of the client. The terms and conditions under which the client shall engage the *Independent Manager(s)* shall be set forth in a separate written agreement between the client and the designated *Independent Manager(s)*. Upon engagement of an *Independent Manager(s)* by the client, the Registrant shall render periodic advisory services to the client limited solely to the monitoring and review of *Independent Manager(s)* performance. Factors which the Registrant shall consider in recommending *Independent Manager(s)* include the client's stated investment objective(s), management style, performance, reputation, financial strength, reporting, pricing, and research.

Please Note: Inverse/Enhanced Market Strategies. The Registrant may recommend long and short mutual funds and/or exchange traded funds that are designed to perform in either an: (1) inverse relationship to certain market indices (at a rate of 1 or more times the inverse [opposite] result of the corresponding index) as an investment strategy and/or for the purpose of hedging against downside market risk; and (2) enhanced relationship to certain market indices (at a rate of 1 or more times the actual result of the corresponding index) as an investment strategy and/or for the purpose of increasing gains in an advancing market. There can be **no assurance** that any such strategy will prove profitable or successful. In light of these enhanced risks/rewards, the client is reminded that they are not required to employ any or all such strategies for his/her/their/its accounts and that alternate means may be available to meet the client's investment objectives.

Client Obligations. In performing its services, Registrant shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify the Registrant if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Registrant's previous recommendations and/or services.

Disclosure Statement. A copy of the Registrant's written Brochure as set forth on Part 2A of Form ADV shall be provided to each client prior to, or contemporaneously with, the execution of the *Financial Planning Agreement*.

- C. Although the Registrant **does not** provide investment supervisory or management services, the Registrant shall provide investment advisory services specific to the needs of each client. Prior to providing investment advisory services, an investment adviser representative will ascertain each client's investment objective(s). Thereafter, the Registrant shall recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at anytime, impose reasonable restrictions, in writing, on the Registrant's services.

- D. The Registrant does not participate in a wrap fee program.
- E. As of April 23, 2014, the Registrant had \$0 in assets under management on a discretionary basis and \$0 in assets under management on a non-discretionary basis.

Item 5 Fees and Compensation

- A. The Registrant **does not** provide investment supervisory or management services.

FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

To the extent it is requested to do so, Registrant may provide its clients with financial planning and consultation services (including tax planning, tax preparation and other non-investment related matters). Registrant's financial planning fees are negotiable, but generally range from \$1,200 to \$50,000 on a fixed-fee basis and \$300 to \$500 on an hourly basis, depending upon the level and scope of the services required and the professional rendering the service(s).

- B. Clients may elect to have the Registrant's financial planning and consulting fees debited from an assigned custodial account. The Registrant may also bill the client directly. Payment for Registrant's services is due upon receipt of the Registrant's invoice.
- C. Registrant **does not** provide investment supervisory or management services. As such, the Registrant does not typically recommend a broker-dealer/custodian. However, if a client requests that the Registrant recommend a broker-dealer/custodian, the Registrant may recommend that RBC Capital Markets, LLC ("*RBC*"); Fidelity Investments, LLC ("*Fidelity*"); Charles Schwab & Co. ("*Schwab*"); The Vanguard Group ("*Vanguard*") or TD Ameritrade, Inc, an independent unaffiliated SEC-registered broker-dealer and member of FINRA/SIPC/NFA ("*TD Ameritrade*"). Broker-dealers such as *RBC*, *Fidelity*, *Schwab*, *Vanguard* and/or *TD Ameritrade* charge brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and fixed income securities transactions).
- D. A portion of the Registrant's initial financial planning and consulting fee shall be paid in advance, with the balance of the financial planning and consulting fee due upon the completion of the initial financial plan. The Registrant, in its sole discretion, may charge a lesser financial planning and consulting fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

The *Financial Planning and Consulting Agreement* between the Registrant and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the *Financial Planning and Consulting Agreement*. Upon termination, the Registrant shall return any unearned portion of any advanced advisory fee collected and any earned but previously uncollected fees shall be invoiced.

- E. **Securities Commission Transactions.** In the event that the client desires, the client can engage the Stephen Cordasco, Registrant's Managing Member, in his individual capacity, as a registered representative of Andrew Garrett, Inc ("AG"), a FINRA member broker-dealer, to implement investment recommendations on a commission basis. In the event

the client chooses to purchase investment products through AG, AG will charge brokerage commissions to effect securities transactions, a portion of which commissions AG shall pay to Registrant's representative, as applicable. The brokerage commissions charged by AG may be higher or lower than those charged by other broker-dealers. In addition, AG, as well as the Registrant's Managing Member, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment.

1. **Conflict of Interest:** The recommendation that a client purchase a commission product from AG presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Registrant's representatives. **The Registrant's Chief Compliance Officer, Stephen Cordasco, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
2. **Please Note:** Clients may purchase investment products recommended by Registrant through other, non-affiliated broker dealers or agents.
3. The Registrant does not receive more than 50% of its revenue from advisory clients as a result of commissions or other compensation for the sale of investment products the Registrant recommends to its clients.
4. When Registrant's representatives sell an investment product on a commission basis, the Registrant does not charge a management fee in addition to the commissions paid by the client for such product. When providing services on an advisory fee basis, the Registrant's representatives do not also receive commission compensation for such advisory services (except for any ongoing 12b-1 trailing commission compensation that may be received as previously discussed).

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

Neither the Registrant nor any supervised person of the Registrant accepts performance-based fees.

Item 7 Types of Clients

The Registrant's clients shall generally include individuals, business entities and trusts. The Registrant, in its sole discretion, may charge a lesser financial planning and consulting fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

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

- A. As set forth in Item 4.B above, the Registrant may provide financial planning and consulting services that utilize the following methods of security analysis:
- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)

The Registrant may provide financial planning and consulting services that utilize the following investment strategies:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)
- Trading (securities sold within thirty (30) days)

Please Note: Investment Risk. Investing in securities involves risk of loss that client should be prepared to bear. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by the Registrant) will be profitable or equal any specific performance level(s).

- B. The Registrant's recommended methods of analysis and investment strategies do not present any significant or unusual risks.

However, every method of analysis has its own inherent risks. To perform an accurate market analysis the Registrant must have access to current/new market information. The Registrant has no control over the dissemination rate of market information; therefore, unbeknownst to the Registrant, certain analyses may be compiled with outdated market information, severely limiting the value of the Registrant's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

The Registrant's primary recommended investment strategies - Long Term Purchases, Short Term Purchases, and Trading - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy. Trading, an investment strategy that requires the purchase and sale of securities within a thirty (30) day investment time period, involves a very short investment time period but will incur higher transaction costs when compared to a short term investment strategy and substantially higher transaction costs than a longer term investment strategy.

- C. Currently, the Registrant may recommend that clients invest among various individual equity (stocks), debt (bonds), and fixed income securities, mutual funds and/or exchange traded funds ("ETFs") (including inverse ETFs and/or mutual funds that are designed to perform in an inverse relationship to certain market indices), in accordance with the client's designated investment objective(s).

As disclosed above, the Registrant may recommend long and short mutual funds and/or exchange traded funds that are designed to perform in either an: (1) inverse relationship to certain market indices (at a rate of 1 or more times the inverse [opposite] result of the corresponding index) as an investment strategy and/or for the purpose of hedging against downside market risk; and (2) enhanced relationship to certain market indices (at a rate of 1 or more times the actual result of the corresponding index) as an investment strategy and/or for the purpose of increasing gains in an advancing market. There can be **no assurance** that any such strategy will prove profitable or successful. In light of these enhanced risks/rewards, the client is reminded that they are not required to employ any or all such strategies for his/her/their/its accounts and that alternate means may be available to meet the client's investment objectives. (*See* Item 4B).

Item 9 Disciplinary Information

The Registrant has not been the subject of any disciplinary actions.

Item 10 Other Financial Industry Activities and Affiliations

- A. **Registered Representative of Andrew Garrett, Inc ("AG")**. The Registrant's Managing Member, Mr. Cordasco is a registered representative of AG, a FINRA member broker-dealer. Clients may choose to engage Mr. Cordasco in his individual capacity as a registered representative of AG, to implement investment recommendations on a commission basis.
- B. Neither the Registrant, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.
- C. **Registered Representatives of AG**. As disclosed above in Item 5E, the Registrant's Managing Member, Stephen Cordasco, is a registered representatives of AG, a FINRA member broker-dealer. Clients may choose to engage, Mr. Cordasco in his individual capacity as registered representative of AG, to implement investment recommendations on a commission basis.

Licensed Insurance Agents. The Registrant's Managing Member, Stephen Cordasco, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. As referenced in Item 4B above, clients can engage Mr. Cordasco to effect insurance transactions on a commission basis.

Conflict of Interest: The recommendation by Stephen Cordasco that a client purchase a securities or insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Mr. Cordasco. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers or insurance agents. **The Registrant's Chief Compliance Officer, Stephen Cordasco, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Other Investment Adviser and Relationship to Registered Investment Company:

The Registrant's Managing Member, Stephen Cordasco, also serves as a Managing Member and an investment adviser representative of West Shore Group, LLC, ("West Shore") an affiliated SEC registered investment advisor firm. West Shore provides discretionary investment advisory services on a *fee* basis, to an affiliated registered investment company – West Shore Real Return Income Fund, (the "Fund").

Conflict of Interest: The recommendation by Registrant that a client invest a portion of their investment account in the Fund presents a conflict of interest, as Registrant's and its Management Member's interest in the Fund may provide an incentive to recommend investment in the Fund based on revenue received, rather than on a particular client's need. The client is reminded that alternate means may be available to meet the client's investment objectives and that no client is under any obligation to invest in the Fund. **The Registrant's Chief Compliance Officer, Stephen Cordasco, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Other Investment Adviser: The Registrant's Managing Member, Stephen Cordasco, also serves as the Managing Member of Cordasco Financial Network, LLC ("CFN"), an affiliated SEC registered investment adviser. The Registrant may refer certain clients to CFN for advisory/discretionary management services. Neither the Registrant nor Mr. Cordasco shall receive compensation for any referral made to CFN. The recommendation by the Registrant that a client engage the investment advisory services of CFN presents a **conflict of interest** as Mr. Cordasco, the Registrant's Managing Member, may receive a direct economic benefit from any such referral. No client is under any obligation to engage the services of CFN. **The Registrant's Chief Compliance Officer, Stephen Cordasco, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

- D. The Registrant does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients.

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

- A. The Registrant maintains an investment policy relative to personal securities transactions. This investment policy is part of Registrant's overall Code of Ethics, which serves to establish a standard of business conduct for all of Registrant's representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, the Registrant also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by the Registrant or any person associated with the Registrant.

- B. The Registrant or its representatives may recommend that clients buy or sell securities or other investment products in which the Registrant or a related person has some financial interest. In particular, the Registrant may recommend that certain of its advisory clients invest in the West Shore Real Return Income Fund, (the "Fund"). As disclosed above in

Item 10.C of this Brochure, Stephen Cordasco, the Registrant's Managing Member, has a financial interest in the Fund as well as the West Shore Group, LLC, an SEC registered investment management firm that provides investment management services to the Fund. In general, control persons of the Registrant intend to maintain significant investments in the affiliated Fund. See Item 10.C above for a description of the Registrant's relationship with the Private Fund, the conflicts of interest it presents and how the Registrant addresses such conflicts.

The Registrant's Chief Compliance Officer, Stephen Cordasco, remains available to address any questions that a client or prospective client may have regarding the above arrangements and any corresponding potential conflicts of interest such arrangements may create

- C. The Registrant and/or representatives of the Registrant *may* buy or sell securities that are also recommended to clients. This practice could create a situation where the Registrant and/or representatives of the Registrant are in a position to materially benefit from the client's sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if the Registrant did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of the Registrant's clients) and other potentially abusive practices.

The Registrant has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of the Registrant's "Access Persons." The Registrant's securities transaction policy requires that Access Person of the Registrant must provide the Chief Compliance Officer or his/her designee with a written report of the their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date the Registrant selects; provided, however that at any time that the Registrant has only one Access Person, he or she shall not be required to submit any securities report described above.

- D. Although such situations, given the limitations of the Registrant's advisory practices, would be extremely rare, if it was to occur, the Registrant and/or representatives of the Registrant *may* buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where the Registrant and/or representatives of the Registrant are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above in Item 11.C, the Registrant has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of Registrant's Access Persons.

Item 12 Brokerage Practices

- A. Registrant **does not** provide investment supervisory or management services. As such, the Registrant does not typically recommend a broker-dealer/custodian. However, if a

client requests that the Registrant recommend a broker-dealer/custodian, the Registrant may recommend that RBC Capital Markets, LLC ("*RBC*"); Fidelity Investments, LLC ("*Fidelity*"); Charles Schwab & Co. ("*Schwab*"); The Vanguard Group ("*Vanguard*") or TD Ameritrade, Inc, an independent unaffiliated SEC-registered broker-dealer and member of FINRA/SIPC/NFA ("*TD Ameritrade*").

Although the Registrant does not participate in the TD Ameritrade Institutional program, Cordasco Financial Network ("CFN"), an affiliated SEC registered investment adviser, does. TD Ameritrade Institutional is a division of *TD Ameritrade*, which offers services to independent investment advisors which include custody of securities, trade execution, clearance and settlement of transactions. CFN receives some benefits from *TD Ameritrade* through its participation in the program. (For more information please see CFN's Brochure).

RBC Financial Support

Prior to commencing its advisory operations, CFN and *RBC* entered into a contract pursuant to which *RBC* and certain affiliates agreed to provide certain financial support to assist CFN with its business transition. Because of the Registrant's affiliation with CFN, the Registrant has a potential conflict of interest in recommending to clients that they use *RBC* as broker-dealer/custodian. Registrant's clients do not pay more for investment transactions effected at *RBC* as a result of this arrangement between CFN and *RBC*. There is no corresponding commitment made by the Registrant to *RBC* as a result of the above arrangement.

The Registrant's Chief Compliance Officer, Stephen Cordasco, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

The Registrant does not receive referrals from broker-dealers.

Item 13 Review of Accounts

- A. Account Reviews are conducted by the Registrant's Managing Member, Stephen Cordasco or his associates. All financial planning clients are advised that it remains their responsibility to advise the Registrant of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues, with the Registrant on an annual basis, as applicable.
- B. The Registrant *may* conduct account reviews on an other than periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.
- C. Clients are provided with transaction confirmation notices and regular summary account statements directly from their broker-dealer/custodian.

Item 14 Client Referrals and Other Compensation

Although the Registrant **does not** provide investment supervisory or management services, its affiliates have relationships that may be viewed as material.

As referenced in Item 12A above, CFN, an affiliated SEC registered investment adviser, may receive an economic benefit from *TD Ameritrade*. CFN's receipt of Additional Services raises a potential conflict of interest.

Registrant's clients do not pay more for investment transactions effected and/or assets maintained at *TD Ameritrade* as a result of the arrangement between CFN and *TD Ameritrade*. There is no corresponding commitment made by the Registrant to *TD Ameritrade* or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

The Registrant's Chief Compliance Officer, Stephen Cordasco, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest any such arrangement may create.

- B. Neither the Registrant nor any of its representatives compensates any person other than its supervised persons for client referrals.

Item 15 Custody

Although the Registrant **does not** provide investment supervisory or management services, clients may elect to have the Registrant's financial planning and consulting fees debited from an assigned custodial account. Those clients that choose to have the Registrant's financial planning and consulting fees debited are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from their broker-dealer/custodian.

Please Note: To the extent that the Registrant provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by the Registrant with the account statements received from the account custodian. **Please Also Note:** The account custodian does not verify the accuracy of the Registrant's advisory fee calculation.

Item 16 Investment Discretion

The Registrant **does not** provide investment management services and, therefore, does not maintain discretion over client accounts.

Item 17 Voting Client Securities

- A. The Registrant does not vote client proxies. Clients 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.

- B. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact the Registrant to discuss any questions they may have with a particular solicitation.

Item 18 Financial Information

- A. The Registrant does not solicit fees of more than \$1,200, per client, six months or more in advance.
- B. The Registrant **does not** provide investment management services and, therefore, does not maintain discretion over client accounts.
- C. The Registrant has not been the subject of a bankruptcy petition.

ANY QUESTIONS: The Registrant's Chief Compliance Officer, Stephen Cordasco, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.