

**Firm Brochure  
(Parts 2A & 2B of Form ADV)**

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**This brochure provides information about our qualifications and business practices.**

**If you have any questions about the contents of this brochure, please contact us telephone or by email. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority. Registration does not imply a certain level of skill or training.**

**Additional information is also available on the internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

**Our searchable IARD/CRD number is 171228.**

**June 2014**

## **Item 2: Summary of Material Changes**

This is the initial brochure filing for Certitude Advisors, LLC and as such there are no material changes to report.

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## **Item 4: Advisory Business**

Certitude Advisors, LLC is a private, independent financial services firm. We offer investment and personal financial advisory services under a fee-only compensation arrangement.

Most of our clients are moderately experienced investors who sought a relationship with a professional financial services firm in order to improve their results and free up their time. For the most part, our clients are conservative in their approach to stock and bond investments.

We provide investment advisory and financial planning services to individual clients, as well as trusts, endowments, qualified retirement plan sponsors, and business entities. Our clients include senior corporate executives, entrepreneurs, and non-profit entities, as well as individuals and families with substantial portfolios, including those who have (or would like to establish) trusts or private foundations. Some of our clients may also come from the ranks of “sudden wealth”—those who find themselves dealing with investment issues related to financial or life events, such as exercising stock options, lump sum retirement plan distributions, asset sales, inheritances, and divorce.

Advice is provided through consultation with you. Certitude Advisors, LLC provides discretionary advisory services (including financial planning), each subject to their own respective client agreement. Investment advisory services are available for both equity and fixed income portfolios.

For discussion of our investment philosophies, and the risks of our strategies and/or specific investments recommended, please refer to Item 8.

We actively seek to avoid, or at least minimize, conflicts of interest which may exist between our firm and you. We sell no products. We accept no commissions. However, all investment advisory firms will likely possess some unavoidable conflicts of interest. In those instances when conflicts of interest arise, we have adopted policies and procedures that seek to keep your best interests paramount at all times. See Items 5, 11 and 12 of this Brochure, and other items, which explains in further detail how we act to keep your best interests first at all times during the course of relationship with you.

## **Our Firm's History**

We were founded in 2014.

## **Our Principal Owners**

Our Principal owners are:

- Jack Ludwig Eisenkramer
- Ronald Jay Fox

- Thomas Joseph Parkins
- Company Treasury Stock

## Types of Advisory Services

### Investment Advisory Services

Equity Portfolios: We advise and provide counsel to clients on the construction and management of customized equity portfolios. Investments may include publicly traded equities (stocks), mutual funds, real estate investment trusts (REITs), exchange traded funds (ETFs), warrants and option contracts.

Fixed Income Portfolios: We advise and provide counsel to clients on the construction and management of customized fixed income portfolios which may be comprised of taxable bonds, tax-exempt bonds, or both.

As part of our personal financial advisory services, we can advise clients about portfolio management decisions related to a variety of other client assets such as 401k accounts, stock options, and concentrated stock positions.

We do not invest in wrap fee programs or manage assets for any wrap fee accounts. We do not invest in initial public offerings (IPOs).

### Financial, Retirement and Tax Planning Services

Needs Analysis and Goal Setting: We help you define and set attainable goals for the near term and for the future, to build your upside potential and mitigate your downside risk. Individual goals might include retirement planning, financial independence, capital preservation, saving for college education, real estate ownership and charitable giving.

Cash Flow Planning: We help to analyze your cash needs and determine the appropriate level of cash to maintain within your portfolio. We also can recommend investment vehicles for your cash, with the goal of maximizing your return while avoiding cash shortages.

#### Tailored Relationships:

While the goals and objectives for each client are reviewed and documented, it is sometime necessary for Certitude Advisors, LLC to create an Investment Policy Statement (“IPS”) or something similar for certain clients that require such a policy document. An IPS is not a necessity for the majority of our client-base, however we can accommodate the request when warranted, such as when a Private Fiduciary or other individual has his or her own requirement to utilize an IPS. Investment policy statements are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

## Assets Under Management

As of April 2014, we manage \$0 in assets on a discretionary basis.

## Our Services are Tailored to Meet Your Needs and Investment Restrictions.

In general, our advisory services are tailored to meet your needs. For most clients each investment portfolio is individually designed. Model portfolios may also be utilized for some clients. Additionally upon request, financial planning, estate planning, tax planning, and risk management planning services can be delivered upon your engaging us for such services. As appropriate, you have the option for a conference with your advisor at least quarterly to review any changes to your financial situation, your investment portfolio, and planning issues.

After consultation with us, you may impose restrictions on investing in certain securities or types of securities. This most often occurs when you request certain social investing needs be addressed, such as through the use of mutual funds which avoid investments in certain companies and/or industries. Other restrictions may be imposed by you with respect to the (average or longest) maturity or credit quality of fixed income investments.

Our Agreement with you may not be assigned without your consent.

## Item 5: Fees and Compensation

### Our Fees

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which investment advisory and financial planning may be beneficial to the you.

#### Discretionary Investment Management

Unless otherwise noted, the Company's annual fee for investment advisory services provided for in this agreement will be calculated as follows:

Annualized Investment Management Fees		
Account Value From	Account Value To	Annual Percentage Fee
\$0	\$299,999	Not to Exceed 2.00%
\$300,000	\$999,999	Not to Exceed 1.75%
\$1,000,000	\$2,499,999	Not to Exceed 1.50%
\$2,500,000	\$4,999,999	Not to Exceed 1.25%
\$5,000,000	\$9,999,999	Not to Exceed 1.00%
Over \$10,000,000		Negotiated

The Company's fee will be billed and paid as follows:

- The fee will be billed and paid on a monthly basis, in advance.
- The account(s) will be valued at the close of business on the last day of the preceding month.
- The fee will be paid by deduction from the managed account on the 10<sup>th</sup> day of the month

We will send a statement to you showing the fee amount, (a) disclose to you that it is your responsibility to verify the accuracy of the retainer calculation and that the custodian will not determine whether the fee is properly calculated, and (b) send a bill to the custodian indicating only the amount of the fee to be paid by the custodian on your behalf.

All fees are negotiable.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by you on an as-needed basis. Conflicts of interest will be disclosed to you in the unlikely event they should occur.

### **Management of Conflicts of Interest between Clients**

Our relationship with you is non-exclusive; in other words, we provide investment advisory services and financial planning services to multiple clients. We seek to avoid situations in which one client's interest may conflict with the interest of another of our clients. More information about this policy is found in your Client Agreement.

### **Return of Unearned Fees upon Termination**

If either party terminates this agreement, the last monthly fee will be prorated as of the effective date stated in the written notice of the termination. The Adviser requires 30 days written notice to terminate their agreement.

### **Other Fees or Expenses Paid in Connection with Our Services**

All fees paid to us for investment advisory and financial planning services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. Mutual fund expenses are generally described in each fund's prospectus. These expenses will generally include a management fee, other fund expenses, and possibly a distribution fee. In addition, mutual funds incur transaction costs and opportunity costs, which are disclosed in the fund's prospectus or Statement of Additional Information, but which may be estimated.

You will incur transaction fees or commissions in connection with trading of mutual fund, ETF, individual stock and bonds (and/or principal mark-ups and mark-downs for principal trades), which are charged by the custodian (brokerage firm holding safekeeping of your assets for safekeeping. Mutual fund transaction fees charged by our recommended custodians, Raymond James Financial, Inc., generally vary from \$15 to \$40 for each purchase and sale transaction. The transaction costs for stock trades (minimum \$75) and bond trades (minimum \$60) vary. Accordingly, you should review both the fees charged by the funds (including transaction and opportunity costs within funds which are not included in a fund's annual expense ratio), the transaction fees charged by the custodian, as well as the fees charged by us, to fully understand the total amount of fees and costs paid by you, in connection with any recommended transaction.

For a discussion of our practice in recommending brokers (custodians) to you and negotiating brokerage fees on your behalf, please see Item 12.

You may also incur “account maintenance fees” and also “account termination fees” upon the transfer of an account from one brokerage firm (custodian) to another. The range for these account termination fees is believed to range generally from \$0 to \$200 at present, but at times may be much higher. You should contact your custodians (brokerage firms, bank or trust company, etc.) to determine the amount of account termination fees which may be charged and deducted from your accounts for any existing accounts which may be transferred.

### **Comparable Services**

We believe that the charges and fees offered are competitive with alternative programs available through other firms offering a similar range of services; however, lower fees for comparable services may be available from other sources.

### **Management of Conflicts of Interest Relating to the Fees We Receive, and Receipt of Percentage-Based Compensation.**

The vast majority of our clients pay us fees, at least partially based upon a percentage of the assets we advise upon. This is a very common form of compensation for registered investment advisory firms and avoids the multiple inherent conflicts of interest associated with commission-based compensation (we do not accept commission-based compensation of any nature, nor do we accept 12b-1 fees). Asset-advised-upon percentage method of compensation can still at times lead to conflicts of interest between our firm and you as to the advice we provide. For example, conflicts of interest may arise relating to the following financial decisions in life: incur or pay down debt; gift funds to charities or to individuals; purchases of a (larger) home or cars or other non-investment assets; the purchase of a lifetime immediate annuity; personal expenditures; investment in private equity investments, and the amount of funds to place in non-managed cash reserve accounts. We have adopted internal policies to properly manage these and other potential conflicts of interest. Our goal is that our advice to you remains at all times in your best interests, disregarding any impact of the decision upon our firm.

Each time such a potential conflict may arise, we will give you notice of the conflict in that given situation if our advice regarding the proposed transaction would impact our compensation.

### **Cancellation and Termination of Agreements**

Please refer to the discussion about our fees under Item 5.

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

Our fees are not based on a share of the capital gains or capital appreciation of managed securities. We do not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to you.



## Item 7: Types of Clients

Please refer to the discussion about our clients under Item 4.

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

Investment Philosophy: We adhere to the principles of maintaining a long-term investment horizon.

Investment Objectives: Our objective is to maximize long-term total return, consistent with moderate risk, for both our clients' capital and our own capital. We seek a balance between diversifying to reduce risk and minimizing portfolio turnover, to enhance the tax efficiency of our private client portfolios.

Independent Analysis: Our security selection and portfolio development are based upon our own, independent assessment of investment merit. We have no affiliation with any investment bank or corporate finance organization. Our licensed investment advisors are highly experienced in helping private clients meet their investment objectives.

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

The main sources of information may include the custodian's research department and any other research department they may offer access to, research materials prepared by others, corporate rating services, annual reports, prospectuses, press releases, filings with the SEC, financial newspapers and magazines, and the Internet.

### Risk of Loss, Generally

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind.

Investors face the following investment risks:

Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

#### Cash Balances in Client Accounts

Cash in your investment accounts are typically swept into the bank or money market mutual fund accounts of the institutions. We discuss with you, during the time of review conferences and at other times, upcoming cash flow needs in order to assist you with planning to meet those needs. Upon your request, cash balances will be maintained for temporary, short-term or strategic purposes.

Should you desire a "cash reserve account," we will assist you to establish a separate, non-managed cash reserve account, which is not monitored thereafter by us, typically either with Schwab, Fidelity, Vanguard (using one of its money market funds) or with an online bank (offering FDIC-insured money market funds, up to certain limits). We then seek to review with you, during periodic conferences, whether any funds are needed to restore cash reserves. We exclude separate accounts established for cash reserve purposes from our fee calculations.

### Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events of their firm or certain management personnel which would be material to your evaluation of us or our integrity in management of your investment portfolio.

We have had no legal or disciplinary events to disclose.

### Item 10: Other Financial Industry Activities and Affiliations

#### Financial Industry Activities

We are not involved in any other financial industry activities.

### Affiliations

We have no arrangements that are material to our advisory business or you with any other entity.

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

We seek to avoid material conflicts of interest. Accordingly, neither we nor our investment adviser representatives/ team members receive any third party direct monetary compensation (i.e., commissions, 12b-1 fees, or other fees) from brokerage firms (custodians) or mutual fund companies.

Although we believe that our business methodologies, ethics rules, and adopted policies are appropriate to eliminate, or at least minimize, potential material conflicts of interest, and to appropriately manage any material conflicts of interest that may remain, you should be aware that no set of rules can possibly anticipate or relieve all potential material conflicts of interest. Please refer to the additional discussion under Item 12 Brokerage Practices.

### Our Code of Ethics

We have adopted a Code of Ethics, to which all investment advisor representatives and employees are bound to adhere. The key component of our Code of Ethics states:

We and its investment advisor representatives and employees shall always:

- Act in the best interests of each and every client;
- Act with integrity and dignity when dealing with clients, prospects, team members, and others;
- Strive to maintain and continually enhance our high degree of professional education regarding Modern Portfolio Theory, strategic asset allocation, and financial, tax, estate, and risk management planning; and
- Seek at all times to preserve our firm's independence and to maintain our complete objectivity with respect to our advisory services and each recommendation made to our clients.

We further adopted a detailed Code of Ethics expressing our commitment to ethical conduct, which is adopted by reference by us, and which is utilized to guide the personal conduct of our various team members. This detailed Code of Ethics describes our fiduciary duties and responsibilities to you and sets forth our practice of supervising the personal securities transactions of employees with prior or concurrent access to client trade information.

A copy of the Code of Ethics is available to you and prospects upon request.

### Participation or Interest in Client Transactions and Personal Trading

Our Code of Ethics provides that individuals associated with our firm may buy or sell securities for their personal accounts identical or different than those recommended to you. However, it is the expressed policy of our firm that no person employed by the firm shall prefer his or her own interest to yours nor make personal investment decisions based on your investment decisions.

To supervise compliance with the Code of Ethics, we require that anyone associated with this advisory practice and who possesses access to advisory recommendations (before or at the time they are entered into) (“access persons”) to provide annual (at minimum) securities holding reports and quarterly transaction reports to our Chief Compliance Officer or his or her designee. We also require access persons to receive advance approval from our Chief Compliance Officer or his designee prior to investing in any initial public offerings or private placements, and with regard to trading of certain individual securities.

The Code of Ethics further includes our policy prohibiting the use of material non-public information and protecting the confidentiality of client information. We require that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to discipline.

## **Item 12: Brokerage Practices**

### **Use of Brokerage Firms (Custodians)**

Generally, we utilize the services of Raymond James Financial’s Investment Advisor Division (IAD) as custodian and they provide our team members with access to institutional trading and custody services, which services are typically not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis and at no charge to them. However, not all independent investment advisors recommend that their clients utilize particular custodians.

### **Discussion of Benefits to Adviser, to us as to Custodians**

The benefits provided by Raymond James Financial include assistance with practice management and assistance with the management of client accounts, including but not limited to: (a) receipt of duplicate client confirmations; (b) receipt of electronic duplicate statements; (c) access to a trading desk serving investment adviser firm participants exclusively, and providing research, pricing information, and other market data; (d) access to the investment advisor portion of their web sites which includes practice management articles, compliance updates, and other financial planning related information and research materials (including, for example, rating reports on individual companies from Standard and Poor’s or other sources); (e) access to other vendors (such as insurance or compliance providers, or providers of research or other materials) on a discounted fee basis through discounts arranged by the custodians; (f) permitting us to access an electronic communication network for client order entry and to access clients’ account information and which may otherwise assist us with its back-office functions, including recordkeeping and client reporting; and (g) conferences at which advisors and employees of our firms may attend (with no registration fees) and receive education on issues such as practice management, marketing, investment theory, financial planning, business succession, regulatory compliance, and information technology.

Generally, many of these services may be utilized to service all or a substantial number of our clients’ accounts. Educational, research, or other services provided by custodians (i.e. Raymond James or mutual fund companies) may benefit all of our clients, or may benefit only some clients.

### Our Recommendations of Brokerage Firms

You are permitted to direct us to utilize your desired brokers. However, if such brokers are utilized, we may not possess access to certain mutual funds and other investments that are generally available only to institutional investors or which would require a significantly higher minimum initial investment, and commission rates paid or transaction fees paid may be higher than the fees negotiated by us.

While as a fiduciary, we endeavor to act in your best interests, our desire that you maintain much of your assets in accounts at Raymond James may be based in part on the benefit to our firms of the availability of some products and services (previously described) at no cost to us, or at reduced costs, and not solely on the nature, cost, or quality of custody and brokerage services provided by the brokers, and this may create a potential conflict of interest. You may, therefore, pay higher transaction fees, commissions (for individual stock and ETF trades), and principal mark-ups and mark-downs (relating to purchases and sales on a principal, as opposed to an agency, basis), than those charged by other discount brokers. However, we have negotiated fees with the custodians we recommend, and we have selected these custodians for their generally low fees relative to another large custodian. Also, please note that we prefer to recommend custodians whom possess significant size and financial resources, for purposes of enhanced safety of your funds. For all of these reasons, the lowest cost custodian for you may not be recommended to you by us.

### Best Execution

We review the execution of trades at each custodian annually. Trading fees charged by the custodians are also reviewed on an annual basis. We do not receive any portion of the trading fees.

### Soft Dollars

We do not receive any soft dollar benefits from broker/dealers acting as custodian for your accounts.

### Order Aggregation

On occasion, we may purchase and/or sell the same security for many accounts, even though each Client account is individually managed. When possible, we may also aggregate the same transaction in the same securities for many Clients for whom we have discretion to direct brokerage. Clients in aggregated transactions each receive the same price per unit, although they may pay differing brokerage commissions depending upon the nature of their directed brokerage arrangements, if any.

## Item 13: Review of Accounts

**Reviews:** Formal client reviews are generally conducted on an annual basis. However, quarterly, semi-annual, or other periodic reviews are available as requested by client. The date of contract inception establishes the annual review cycle.

Each investment advisor representative is responsible for reviewing their own client accounts.

Additional Portfolio Reviews are undertaken upon your request, such as when special cash needs arise or when additional cash or securities are added to the investment portfolio. We will respond to such requests within a reasonable period of time.

### Regular Reports

All clients receive statements from their broker/dealers and/or mutual funds on a monthly or quarterly basis. The statements reflect month-end or quarter-end closing prices of any securities in the account, the total account value, all transactions in the reporting period, and all deposits in the reporting period, all income received in the reporting period, and all distributions paid in the reporting period.

We may also offer periodic data for other investment accounts upon which we provide advice, not held at the foregoing custodians, if such information can be obtained from our account aggregation services, and provided your consent is obtained to furnish such account aggregation service with any account passwords required to access account information.

While we are hopeful that the information supplied by custodians and data aggregation services is reliable, we cannot guarantee its accuracy.

Clients may also directly access account information at the custodians with which the accounts are held online (specifically Raymond James Financial.), each and every business day, via the secure web sites of these institutions.

You are strongly encouraged to review the monthly or quarterly statements you receive from custodians. Despite the best efforts of any firm to safeguard client's assets, fraud could still occur. While we hope that you trust our firm and advisors, and we have never had an instance of theft of client funds, we believe it is nevertheless important for you to verify your investment holdings.

## Item 14: Payment for Client Referrals

### Incoming Referrals

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

### Referral Fees Paid

We do not compensate anyone for client referrals.

### Referrals Out

We do not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

### Other Compensation

We do not receive any commissions or referral fees for any recommendations we make to other professionals.

### **Item 15: Custody**

It is our policy to not accept custody of your securities. In other words, we are not granted access to your accounts which would enable us to withdraw or transfer or otherwise move funds or cash from any of your account(s) to our accounts or the account of any third party (other than for purposes of fee deductions).

However, with your consent, we may be provided with the authority to seek deduction of our fees from your accounts; this process generally is more efficient for both you and us, and there may be tax benefits for you to this method when fees can be paid from certain tax-deferred accounts of clients.

We will send a statement to you showing the amount of the retainer fee, (a) disclose to you that it is your responsibility to verify the accuracy of the retainer calculation and that the custodian will not determine whether the fee is properly calculated, and (b) send a bill to the custodian indicating only the amount of the fee to be paid by the custodian.

### **Item 16: Investment Discretion**

The advisor offers its clients the option of both discretionary and non-discretionary advisory services.

Discretionary Advisory Services: The Adviser contracts for limited discretionary authority to transact portfolio securities accounts on behalf of clients. Discretionary authority is granted either by the Adviser's investment management agreement and/or by a separate limited power of attorney where such document is required. The Adviser has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The firm's discretionary authority regarding investments may however be subject to certain limitations. These limitations are recognized as the restrictions and prohibitions placed by the Client on transactions in certain types of business or industries. All such restrictions are to be agreed upon in writing at the account's inception.

The client authorizes the discretion to select the custodian to be used and the commission rates paid to the Adviser. The Adviser does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Non-Discretionary Advisory Services: The Adviser will consult with the client where discretion is not obtained prior to each trade in order to obtain client approval for the transaction(s). Implementation of our investment and financial planning recommendations is at your discretion. Upon request and prior agreement, we do accept assignment of a limited power of attorney (separate document signed by you) that authorizes us to make buy-sell transactions under your direction. Nearly all clients appoint us as the client's agent and attorney-in-fact with respect to



undertaking client-approved trades in their accounts because our ability to enter trades electronically for you often provides reduced transaction fees and other benefits to the client.

You approve the custodian to be used and the commission rates paid to the custodian. We do not receive any portion of the transaction fees or commissions paid by you to the custodian on certain trades.

### **Item 17: Voting Client Securities**

As a matter of firm policy and practice, we do not accept authority to vote proxies on your behalf. Generally, you will receive their proxies or other solicitations directly from the custodian or transfer agent. However, you may call or e-mail us with questions regarding a particular proxy or other solicitation, and we may provide advice to you regarding your voting of proxies or such solicitations, upon your request. Nearly all clients authorize us to receive duplicate copies of proxies and other correspondence from investment sponsors.

You retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios.

You should note that we will not advise nor act on your behalf in legal proceedings involving companies whose securities are held or previously were held in the your account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, you may direct us to transmit copies of class action notices to you or a third party. Upon such direction, we will make commercially reasonable efforts to forward such notices in a timely manner.

### **Item 18: Financial Information**

Our fees are due and payable, in advance, on a monthly basis.

A balance sheet is not required to be provided because we do not serve as a custodian for your funds or securities, and do not require prepayment of fees of more than \$500 and six months or more in advance.

We are required to disclose any financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. We currently possess no such financial condition. We have never been the subject of a bankruptcy proceeding.

### **Additional Information**

#### **Business Continuity Plan**

##### **General**

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



### Disasters

The Business Continuity Plan covers natural and manmade disasters. Electronic files are backed up daily and archived offsite.

### Alternate Offices

An alternate office has been identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact you within five days of a disaster that dictates moving our office to an alternate location.

### Information Security Program

We maintain an information security program to reduce the risk that your personal and confidential information may be breached.

## Privacy Notice

We are committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us. The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

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

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

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

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, the information will be destroyed.

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