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This brochure provides information about the qualifications and business practices of LJPR, LLC. If you have any questions about the contents of this brochure, please contact us at 248-641-7400. 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.

LJPR, LLC is a registered investment advisor. Registration of an Investment Advisor does not imply any level of skill or training.

Additional information about LJPR, LLC is available on the SEC's website at adviserinfo.sec.gov.

Firm Brochure

(Part 2A of Form ADV)

Material Changes

Material Changes since the Last Update

The previous version of this ADV Part 2a was dated November 25, 2014.

George Bundy has purchased ownership shares in LJPR, LLC.

LJPR has opened a branch office in Flint, Michigan.

Full Brochure Available

Our brochure is available on our website, [**www.ljpr.com/disclosure**](http://www.ljpr.com/disclosure), free of charge. Also, it can be accessed by contacting our office at 248-641-7400 or via email at info@ljpr.com.

Additional information about LJPR, LLC is also available via the SEC website, [**www.adviserinfo.sec.gov**](http://www.adviserinfo.sec.gov). The SEC also provides information about persons affiliated with LJPR, LLC who are registered, or are required to be registered, as investment adviser representatives of LJPR, LLC.

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Advisory Business

Firm Description

LJPR, LLC, was founded in 1989 and registered with the SEC that same year. The firm was originally named LaBrecque, Jackson, Price and Roehl and later shortened to LJPR.

LJPR, LLC (herein also referred to as the Advisor) offers professional fee-based investment supervisory services, providing independent financial, investment management, retirement planning, education funding, tax and estate planning services.

LJPR, LLC is strictly a fee-only financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted. We do not accept any direct compensation from the products or custodians we choose, but do accept compensation in the form of 'soft dollars'. See *Soft Dollars* section, below.

Principal Owners

Leon C. LaBrecque owns a 65.1564% share.

Brian J. Roehl owns a 32.5731% share.

Leonard F. Nowak owns a 0.6616% share.

Matthew K. Teetor owns a 1.2227% share.

Michael D. Reed owns a 0.1287% share.

Jason J. Budrick owns a 0.1287% share.

George E. Bundy owns a 0.1287% share.

Types of Advisory Services

LJPR's investment supervisory and management services provide for ongoing and continuous investment management, financial advice and other services. The Advisor may offer a complimentary general consultation to

discuss services available, to give a prospective client time to review services desired, and to determine the possibility of a potential client-advisor relationship. Investment advisory services will only begin after the client and Advisor formalize the relationship with a properly executed Advisory Services Agreement (also known as a 'Fee Agreement').

After the formal engagement, the Advisor and client will share in a data gathering and discovery process in an effort to determine the client's personal needs, goals, intentions, time horizons, risk tolerance and investment objectives, based upon information provided by the client and the nature of services requested. In order to provide truly comprehensive financial solutions, the initial consultation generally will involve two Advisors of LJPR.

A team approach to financial planning and investment management ensures for our clients that all critical elements in their financial future are addressed. Upon completion of the data gathering and implementation process, one Advisor will be the primary client contact to provide day-to-day administration of the client account, perform reviews with clients and to answer any questions the client may have regarding their account.

In the fulfillment of initial and ongoing services, the Advisor will review overall aspects of a client's current financial situation and consider both long and short-term objectives. LJPR may provide additional value-added services, dependent upon portfolio size as disclosed on the following page:

LJPR, LLC Overview of Services				
	Assets Under Management (AUM)			
	\$100,000 - \$500,000	\$500,000 - \$1,000,000	\$1,000,000 - \$2,500,000	\$2,500,000 +
Risk Management				
Medicare/Retirement Health Care	✓	✓	✓	✓
LTC Analysis	○	✓	✓	✓
Review	○	○	✓	✓
Recommendations	○	○	✓	✓
Disability Analysis	○	○	✓	✓
Analysis	○	○	○	✓
Estate Planning				
Testamentary Letter	✓	✓	✓	✓
Will	○	✓	✓	✓
Revocable Living Trust	○	✓	✓	✓
Powers of Attorney	○	✓	✓	✓
Trustee Manual	○	○	✓	✓
Irrevocable Trust	○	○	○	✓
Charitable Gifting, CRAT, CRUT, DAF	○	○	○	✓
Family LLC, Sub-S	○	○	○	✓
Financial Planning				
Cash Flow Analysis	○	✓	✓	✓
Education Planning	○	✓	✓	✓
Ongoing Financial Plan Review	○	○	✓	✓
Comprehensive Diagnostic	○	○	✓	✓
Inter-Generational Planning	○	○	○	✓
Retirement Planning				
Goals Analysis	✓	✓	✓	✓
Benefits Review & Analysis	✓	✓	✓	✓
401(k) Allocation	○	✓	✓	✓
Gap Analysis	○	✓	✓	✓
Social Security Analysis	○	✓	✓	✓
Plan Design (Small Business)	○	✓	✓	✓
Investment Planning				
Optimal Custom Muni Portfolio	✓	✓	✓	✓
Optimal Custom Tax Efficient Equity Strategy	✓	✓	✓	✓
Policy Development	✓	✓	✓	✓
Strategy Development	✓	✓	✓	✓
Implementation	✓	✓	✓	✓
Investment Policy Statement	✓	✓	✓	✓
Ongoing Monitoring & Management	✓	✓	✓	✓
Account Aggregation	○	○	✓	✓
Taxes				
Roth IRA Analysis	✓	✓	✓	✓
Planning	○	✓	✓	✓
Preparation - Individuals	○	✓	✓	✓
Preparation - Family/Business	○	○	○	✓
LJPR Team				
Certified Financial Planner®	✓	✓	✓	✓
Tax/Estate Planning Attorney	✓	✓	✓	✓
Certified Public Accountant	✓	✓	✓	✓
Chartered Financial Analyst	✓	✓	✓	✓
Accredited Investment Fiduciary®	✓	✓	✓	✓
Accredited Wealth Management Advisor®	✓	✓	✓	✓
Certified Investment Management Analyst®	✓	✓	✓	✓
Chartered Alternative Investment Analyst®	✓	✓	✓	✓
Certified Technology Specialist™	✓	✓	✓	✓
Personal Financial Specialist	✓	✓	✓	✓
Marginal Annual Fee (% AUM)	1.25%	0.95%	0.60%	0.485%
✓ = Included ○ = Optional Fee May Apply				

A client may choose which of these services they need and has the opportunity to use other professionals if they desire. If a client does not achieve the target asset level they may add services which may entail additional fees. The fee will be billed separately from the advisory fee and the client will be provided a good faith estimate of any additional costs before the services are rendered. LJPR welcomes the opportunity to provide individualized services. However, where information is limited or not provided by the client, or services have been declined by the client, the client must understand that comprehensive investment needs or objectives may not be fully considered due to the client's option not to receive a service, lack of information or incomplete client disclosure.

Clients engaging investment advisory services must play an active role. The Advisor requires the client to participate in the formation of investment advice and recommendations. Clients may call the office to discuss their portfolio or ask questions at any time, but it is recommended that clients meet with the Advisor no less than annually.

Clients are obligated to immediately inform the Advisor of any changes in their financial situation to provide the Advisor with the opportunity to review the portfolio to determine that it is still structured to meet the client's stated needs and objectives. It is imperative that clients communicate their thoughts and plans to the Advisor when a change occurs, so that prompt action can be taken.

After an analysis and data gathering process and depending upon the nature of services desired, LJPR may prepare reviews, analysis, asset allocation recommendations, and may recommend specific investments. The ongoing investment supervisory and management services provided are based upon unique individual needs as stated by the client. LJPR will allocate the client's assets among various investments, taking into consideration the overall management style selected by the client. The Advisor may utilize its own pre-designed model for the portfolio or custom design one specifically. However, all clients receive individualized advice.

As of January 22, 2015, LJPR, LLC manages approximately \$692,374,733 in assets for approximately 1948 clients on a discretionary basis.

Tailored Relationships

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

Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define typical client relationships.

Advisory Service Agreement

Most clients choose to have LJPR, LLC manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed, including those of their dependent children. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. An Advisory Service Agreement may include: cash flow management, insurance review, investment management (including performance reporting), education planning, retirement planning, estate planning, and tax planning/preparation, as well as the implementation of recommendations within each area, with one exception being the purchase of insurance policies. LJPR, LLC does maintain a list of insurance agents who have been thoroughly vetted and will if requested by a client make a recommendation. LJPR, LLC does not receive nor would they accept compensation from any referrals to insurance agents.

The annual Advisory Service Agreement fee is based on a percentage of the investable assets according to the following schedule:

- 1.250% for the first \$500,000,
- 0.950% for the next \$500,000 (above \$500,000 to \$1,000,000),
- 0.600% for the assets over \$1,000,000 but less than \$2,500,000, and
- 0.485% for the assets over \$2,500,000.

The minimum annual fee is \$1,250 and is negotiable. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. Generally, the advisor will provide 90 days prior written notice to give the client ample time to find a new professional to assist them. The client may terminate the agreement at any time without prior notice. At termination, fees will be billed on a pro-rata basis for the portion of the quarter completed. The portfolio value at the time of termination is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Personal tax preparation work is performed as an integral part of the Advisory Service Agreement and is included if assets under management are over \$250,000. Eligible federal and applicable state returns are filed electronically without an additional fee.

Retainer Agreement

In some circumstances, a Retainer Agreement is executed in lieu of an Advisory Service Agreement when it is more appropriate to work on a fixed-fee basis. The annual fee for a Retainer Agreement is \$1,250 and is negotiable.

Tax Preparation Agreement

Personal income tax preparation work is included in the Advisory Service Agreement with assets under management of \$250,000 or more for non-discounted clients. These services will be performed by LJPR Tax Services, LLC, and LJPR advisers.

Hourly Planning Engagements

LJPR, LLC provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$250 to \$400 depending on the complexity of the planning service and the staff involved in the process. Simple tasks not within the scope of the advisory agreement may be billed at a lower or flat-fee rate.

Asset Management

Assets are invested primarily in no-load or load-waived mutual funds, exchange-traded funds (ETFs), and individual fixed income securities through custodians. Mutual fund companies charge each fund shareholder an

investment management fee that is disclosed in the fund prospectus. Custodians may charge a transaction fee for the purchase or sale of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The custodian charges a fee for stock and bond trades. LJPR, LLC does not receive any compensation, in any form, from fund companies or brokerage houses.

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

Initial public offerings (IPOs) are generally not available through LJPR, LLC.

Termination of Agreement

A client may terminate any of the aforementioned agreements at any time by notifying LJPR, LLC in writing and paying the fees for the time spent on the investment advisory engagement prior to notification of termination. LJPR does not normally charge any advance fees but if the client made an advance payment, LJPR, LLC will refund any unearned portion of the advance payment.

LJPR, LLC may terminate any of the aforementioned agreements at any time by providing the client a written notice 90 days prior to termination and charging the fees for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, LJPR, LLC will refund any unearned portion of the advance payment.

Fees and Compensation

Description

LJPR, LLC bases its fees on a percentage of assets under management, hourly charges, and fixed fees (not including subscription fees) such as a flat dollar amount.

Some Retainer Agreements may be priced based on the complexity of work, especially when asset management is not the most significant part of the relationship.

Fees are negotiable, but must be agreed upon by both parties prior to the engagement.

Fee Billing

Investment management fees are billed quarterly, in arrears, meaning that LJPR will invoice the client after each three-month billing period has ended. Fees are billed at the end of each calendar quarter based on the balance on the last day of the quarter. Prorations will be done for money added or withdrawn during the quarter. The client will receive a copy of an invoice with the detail of how it was calculated and the amount of fees charged and how they were allocated if there are multiple accounts. Payment in full is expected upon invoice receipt. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of any account.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and commissions on exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

If it is determined that a client portfolio shall contain corporate debt or other types of over-the-counter securities, the client may pay a mark-up or mark-down or a spread to the broker or dealer on the other side of the transaction that is built into the purchase price of the security. In some cases, a Prime Brokerage agreement is available, where the client pays a flat fee on the fixed-income transaction and does not participate in the mark-up.

A client could invest in a mutual fund or variable annuity or investment partnership directly, without the services of the Adviser. Accordingly, the client should review both the fees charged by the funds and the applicable program fee charged by the Adviser to fully understand the total amount of fees to be paid by the client and to thereby evaluate the Advisory services being provided.

LJPR, LLC, at its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria, such as historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, and other criteria that the Advisor deems as a good business decision.

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by the client to LJPR, LLC. LJPR is sensitive to the fees charged by various mutual fund companies, but it is not the dominant factor in the final analysis.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Fees for Specialized Accounts and Advisory Services

LJPR, LLC provides operational management services to the Cambridge Index Strategy. The Cambridge Index is a proprietary 50 stock tax-advantaged index strategy. The Proprietary Investment Strategy is described in a U.S. Patent. LJPR received an exclusive license to practice certain aspects of the Proprietary Investment Strategy. LJPR does not meet with individual investors, nor provide any investment, tax, or planning advice to individual clients. However, LJPR shall meet with and provide support to Cambridge-affiliated Advisors (and other advisers as the case may be) to facilitate their participation in the Index Strategy. This will consist of explaining the strategy, assisting in opening accounts and other operational aspects of their participation. LJPR provides reports and tracks performance of the individual accounts. LJPR will not charge any trading fees; rather the accounts will only pay commissions charged for actual transactions directly to the custodian. LJPR will charge an asset-based fee annually of which a royalty will be paid to Cambridge if the Strategy is employed by non-Cambridge advisors. LJPR will charge an asset-based fee of 22.50 basis points annually (0.225%). For non-Cambridge clients, the fee is 32.50 basis points annually (0.325%), out of which a royalty of 10.00 basis points shall be paid to Cambridge. Fees shall be billed quarterly in arrears. The agreement is in effect for one year but may be renewed automatically unless the parties terminate the relationship. Either party may terminate the agreement for any reason upon ninety (90) days written notice to the other. Upon termination, the adviser shall receive fees prorated through the actual date of termination.

Performance-Based Fees

Sharing of Capital Gains

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

LJPR, LLC does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the advisor to recommend an investment that may carry a higher degree of risk to the client in order to obtain a greater fee.

Types of Clients

Description

LJPR, LLC generally provides investment advice to individuals, trusts, pension and profit sharing plans, estates, non-profit organizations, charitable organizations, corporations and business entities.

Client relationships vary in scope and length of service.

Account Minimums

The minimum account size is \$100,000 of assets under management, which equates to an annual fee of \$1,250.

When an account falls below \$100,000 in value, the minimum annual fee of \$1,250 may be charged. Depending upon circumstances, LJPR, LLC may provide an Hourly Agreement with the client if assets have diminished significantly below \$100,000.

LJPR, LLC has the discretion to waive the account minimum. Other exceptions will apply to employees of LJPR, LLC and their relatives, or relatives of existing clients.

Clients with assets below the minimum account size may pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include fundamental analysis, technical analysis, and cyclical analysis, among other techniques.

The main sources of information include the financial press (e.g., Wall Street Journal, Thompson/Reuters, etc.), inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, due diligence visits to fund companies, filings with the Securities and Exchange Commission, and company press releases. Additionally, research reports and tools are provided by the custodians utilized by LJPR, LLC clients.

Other sources of information that LJPR, LLC may use include Bloomberg, Morningstar Principia, Zephyr, and online sources.

Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation utilizing a core and satellite approach. This means that we use passively managed, actively managed, and exchange-traded funds as the core investments, and then add funds where there are greater opportunities to make a difference in specific sectors, industries, or geographic locations. Portfolios are globally diversified to mitigate the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives and risk tolerances stated by the client during consultations. The client may change these objectives or level of risk at any time.

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

We will follow the investment directions from clients to purchase assets in their accounts at their direction. The advisor associated with their account will review with the client where it fits in the overall allocation of their account(s).

Risk of Loss

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

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible or 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.

- **Foreign Tax Risk:** Investors may be subject to foreign taxes if LJPR, LLC invests in a foreign mutual fund. Issuers of foreign securities are usually not subject to the same degree of regulation as U.S. issuers. Reporting, accounting, and auditing standards of foreign countries differ, in some cases significantly, from U.S. standards. Tax laws and regulations applicable to an account are subject to change, and unanticipated tax liabilities could be incurred by investors as a result of such changes. Investors should consult their own tax advisors to determine the potential tax-related consequences of investing.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in any disciplinary actions related to past or present investment clients. Neither the firm nor any of its employees are currently engaged in any legal action from past or current investment clients.

Other Financial Industry Activities and Affiliations

Other Financial Industry Activities

Educational Seminars relating to general financial and pre-retirement planning topics are prepared and presented.

Leon LaBrecque is a licensed attorney and does legal work that primarily involves drafting estate planning documents. The firm employs another attorney, Maria Avesian, to prepare estate plans, draft deeds and assist clients in the probate process. Ms. Avesian is an attorney and acting as such, does provide services outside her employment with LJPR on a limited basis.

The firm employs Alan Miller, a CPA, to head LJPR Tax Services, LLC, and supervise the preparation of tax returns. As a CPA, Mr. Miller has personal clients and business clients where he performs a variety of functions for clients independent of LJPR.

LJPR owns a 20% interest in LJPR Tax Services, LLC. Mr. LaBrecque, who is the majority partner in LJPR, LLC also holds a 60% interest in LJPR Tax Services, LLC. LJPR Tax Services prepares and reviews tax returns for LJPR

clients. They also do individual and corporate tax work outside of the relationship of LJPR, LLC.

The advisory representatives of LJPR, LLC occasionally may speak before various groups and organizations (such as union groups) and may provide general educational information regarding investment topics. LJPR may charge a fee for these types of services. Participants are never obligated to seek individualized investment advisory services with the Advisor, but are welcome to engage those services at their discretion.

LJPR, LLC does not generally process class action claims on behalf of our clients, but may, at the Firm's discretion on a client-by-client basis.

LJPR has an arrangement with Cambridge Connection, Inc. to operate the Cambridge Index Strategy. See *Fees for Specialized Accounts and Advisory Services* section, above.

LJPR is not currently, nor in the process of applying to become, a broker-dealer, futures commission merchant, commodity pool operator or commodity trading adviser. Additionally, LJPR has not made any arrangements material to its advisory business with a related person who is a: broker-dealer, investment company, financial planning firm, commodity pool operator, commodity trading adviser, futures commissions merchant, banking or thrift institution, law firm, insurance company or agent, pension consultant, real estate broker or dealer or entity that creates or packages limited partnerships.

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

Code of Ethics

The employees of LJPR, LLC have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

LJPR, LLC and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the LJPR, LLC *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of LJPR, LLC is James R. Mason. He reviews all employee trades in reportable securities¹ regularly. His trades are reviewed by Brian Roehl. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm are always prioritized over the actions and trades of the employees. Since most employee trades are mutual fund trades or exchange-traded fund trades, the trades should not affect the securities markets. Employees are encouraged to follow the model portfolios available to clients, but may invest differently based on their comfort with risk.

Brokerage Practices

Selecting Brokerage Firms

LJPR, LLC does not have any affiliation with product sales firms. Specific custodian recommendations are made to clients based on their need for such services.² LJPR, LLC recommends custodians based on the proven integrity and financial responsibility of the firm.

Consultation clients may use any brokerage firm they choose to implement transactions at their discretion; LJPR does not participate or service these transactions. Any client requests for directed brokerage must be made in

¹ "Reportable Securities" include but are not limited to securities, including stocks, bonds, futures, options, investment contracts, limited partnerships, hedge funds, foreign mutual funds, etc.

² In limited circumstances, and at our discretion, some clients may instruct our firm to use one or more particular brokers for the transactions in their accounts. If you choose to direct our firm to use a particular broker, you should understand that this might prevent our firm from aggregating trades with other client accounts or from effectively negotiating brokerage commissions on your behalf. This practice may also prevent our firm from obtaining favorable net price and execution. Thus, when directing brokerage business, you should consider whether the commission expenses, execution, clearance, and settlement capabilities that you will obtain through your broker are adequately favorable in comparison to those that we would otherwise obtain for you.

writing. For Investment Supervisory clients, LJPR suggests clients maintain custody of their assets and to effect trades for their accounts with one of three registered broker-dealers: the Schwab Institutional division of Charles Schwab & Co., Inc. (Schwab), TD Ameritrade (TD) or Fidelity Registered Investment Advisors Group (Fidelity).

LJPR believes these three custodians provide an impressive overall level of services and value including competitive brokerage fees, systematic order execution, accurate pricing services and client reporting, and internet service platforms that ensure the integrity and confidentiality of data transmission and client account access.

In certain cases, a security may be purchased through another broker-dealer and in such cases, the security purchased is then transferred to the client custodial account at Schwab, Fidelity or TD and a “trade away” delivery fee is assessed to the client account. Clients are welcome to direct the Advisor to use their own preferred service provider or broker, in which case the Advisor may not be able to provide best execution, because of limitations that may be placed on the Advisor by the client’s service provider or broker. Clients directing the Advisor to use their own preferred broker may pay higher costs than clients who do not make such a specification.

LJPR, LLC does not receive fees or commissions from any of these arrangements.

Best Execution

LJPR, LLC reviews the execution of trades and the trading fees at each custodian and in all client accounts. LJPR, LLC does not receive any portion of the trading fees.

Soft Dollars

Schwab Institutional, TD Ameritrade, and Fidelity make available to LJPR other products and services that benefit the Advisor, but may not directly benefit client accounts. Some of these other products and services assist LJPR in managing and administering clients’ accounts. These include software and other technologies that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution and allocation of aggregated trade orders for multiple client accounts; provide research, pricing information and other market data; facilitate payment of Advisor’s fees from its clients’ accounts; and assist with back-office functions,

recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of LJPR's accounts.

The preferred broker-dealers may also make available other services intended to assist LJPR in managing and further developing its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, Schwab particularly has discounted or waived fees it would otherwise charge for some of these service programs for LJPR, specifically the portfolio management software that LJPR utilizes, PortfolioCenter, and has waived attendance fees for members of LJPR to attend Schwab's annual conference, "Impact." Schwab Institutional's services are not contingent upon the Advisor committing to Schwab any specific amount of business, either assets in custody or trading.

While as a fiduciary, LJPR endeavors to act in its clients' best interests. LJPR's requirement that clients maintain their assets in accounts at Schwab, TD or Fidelity may be based in part on the benefit to LJPR of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the preferred broker-dealers, which may create a potential conflict of interest. The Advisor's Chief Financial Officer is responsible for monitoring considerations received from the preferred broker-dealers by LJPR. LJPR believes that any product where the firm receives a benefit would be purchased independently of the relationship with the custodian. We further believe that the offering of a discount or waiving fees is a way to reward LJPR as good customers and does not interfere with our decisions to place or not place business with that firm. There are no requirements or minimum levels LJPR must maintain to receive these benefits. A client should be aware that such Soft Dollars do present a conflict of interest even when fully disclosed. LJPR does not use any soft dollar services to favor any client account over another, regardless of the broker used by the client.

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit. In the event that the same security needs to be purchased or sold in multiple client accounts at the same time, LJPR uses a block trade to ensure all clients gets the same execution price. All clients/investors, accounts or funds participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rata basis.

Agency and Principal Cross Transactions

There exists the possibility that a client may need to sell a security at the same time that another may need to purchase the same security or something comparable. In such situations, the Advisor may effect a trade between the two client accounts.

This is known as an “agency cross transaction”. Such trades are done when the traders at the custodian holding the security go to the open market, price both trades, and taking the mid-point of the prices. By not “cross trading,” both clients would end up with a worse price for the security. A “principal cross transaction” is where a client would sell a security to the Firm, and the Firm would sell the security to another client from its own inventory.

LJPR, LLC does not maintain an inventory of securities and therefore will not engage in any principal cross transactions. However, clients should be aware that while agency cross transactions are a possibility (primarily when trading fixed income securities), LJPR does not receive any kind of commission for trading in that manner, and such trades are done only under circumstances where the client benefits more than they would on the open market.

Review of Accounts

Periodic Reviews

Account reviews are performed at least annually by advisors. Account reviews are performed more frequently when market conditions dictate. The Firm’s Investment Team reviews model allocations regularly and rebalances the models as necessary. Rebalancing is the process of adjusting the portfolio to desired asset allocation targets to ensure that your investment disciplines remain in place.

Portfolio Reports are run monthly to make sure that objectives are being met. Reviews are also run when a client requests information regarding an account.

Since financial markets and client objectives change, it is important for clients to monitor their portfolio on an ongoing basis. They may have triggering events that advisors cannot predict. Specific investment classes perform at different rates within a diverse portfolio and fluctuation can change how assets are allocated.

Review Triggers

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

Regular Reports

At LJPR we pride ourselves on the highest level of client communication and service. We meet with clients regularly for portfolio reviews. Clients are strongly encouraged to meet with their Advisor at least annually. Our portfolio reporting systems provide powerful tools to present written reports that meet the client's specific informational needs in addition to being user-friendly and easy to understand.

Client Referrals and Other Compensation

Incoming Referrals

LJPR, LLC has 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.

Schwab Advisor Network

LJPR receives client referrals from Charles Schwab & Co. through LJPR's participation in Schwab Advisor Network® ("the Service"). The Service is designed to help investors find an independent investment advisor. Charles Schwab & Co. is a broker/dealer independent of, and unaffiliated with LJPR. Charles Schwab & Co. does not supervise the Advisor and has no responsibility for LJPR's management of clients' portfolios or LJPR's other advice or services. LJPR pays Charles Schwab & Co. fees to receive client referrals through the Service. LJPR's participation in the Service may raise potential conflicts of interest as described below.

LJPR pays Schwab participation fees on all referred clients' accounts that are maintained in custody at Charles Schwab & Co. and a non-Schwab custody fee on all referred clients' accounts that are maintained at, or transferred to, another custodian. Participation fees are a percentage of the value of the assets in the client's account. LJPR pays Schwab participation fees for so long

as the referred client's account remains in custody at Schwab. Participation fees are billed to LJPR quarterly and may be increased, decreased or waived by Schwab from time to time. Participation fees are paid by LJPR and not by the client. LJPR does not charge clients referred through the Service fees or costs greater than the fees or costs LJPR charges clients with similar portfolios who were not referred through the Service.

LJPR generally pays Schwab a non-Schwab custody fee if custody of a referred client's account is not maintained by, or assets in the account are transferred from Schwab. The non-Schwab custody fee is a one-time payment equal to a percentage of the assets placed with a custodian other than Schwab. The non-Schwab custody fee is higher than the participation fees Advisor generally would pay in a single year. Thus, LJPR will have an incentive to recommend that client accounts be held in custody at Schwab.

The participation and non-Schwab custody fees are based on the amount of assets in accounts of LJPR clients who were referred by Schwab and those referred clients' family members living in the same household. Thus, LJPR will have incentives to encourage household members of clients referred through the Service to maintain custody of their accounts at Schwab.

For accounts of the Advisor clients maintained in custody at Schwab, Schwab generally does not charge the client separately for custody but receives compensation from the client in the form of commissions or other transaction-related compensation on securities trades Schwab executes for the client's account. Clients also pay Schwab a fee for clearance and settlement of trades executed through broker-dealers other than Schwab. Schwab's fees for trades executed at other broker-dealers are in addition to the other broker-dealer's fees. Thus, LJPR may have an incentive to cause trades to be executed through Schwab rather than another broker-dealer.

Referrals Out

LJPR, LLC does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them. LJPR does its best to make sure the client is referred to individuals who are qualified at what they do. LJPR makes no warranties or promises on the outcome based on the final decision by the client. These business people are separate from and not affiliated or employed by LJPR.

Custody

Custody

In all cases, clients have a direct and beneficial interest in their securities (individual ownership), rather than an undivided interest in a pool of securities. LJPR does not and will not take custody of client's funds or securities, except for limited access to deduct investment advisory fees via the qualified custodian and only with the appropriate client authorization. Client funds and securities are held at the client's selected custodial service provider(s).

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the quarterly billing statements provided by LJPR, LLC.

Investment Discretion

Discretionary Authority for Trading

LJPR, LLC accepts discretionary authority to manage securities accounts on behalf of clients. LJPR, LLC 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 client approves the custodian to be used and the commission rates paid to the custodian, with the exception of the purchase of individual fixed income securities as previously noted. LJPR, LLC does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in client accounts on the client's behalf so that LJPR may promptly implement the investment policies that the client has approved.

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.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute trades on your behalf.

Voting Client Securities

Proxy Votes

LJPR, LLC votes proxies for securities over which it maintains discretionary authority consistent with its proxy voting policy. The Firm uses an electronic proxy voting service, Broadridge ProxyEdge®, to ensure that records are made available for recordkeeping and review.

LJPR, LLC's policy is to vote all proxies from a specific issuer the same way for each client absent qualifying restrictions from a client. Clients are permitted to place reasonable restrictions on the Firm's voting authority in the same manner that they may place restrictions on the actual selection of account securities. The Firm will generally vote in favor of routine housekeeping proposals such as the election of directors and selection of auditors, absent conflicts of interest that cause board members to become entrenched or cause unequal voting rights. LJPR, LLC does not vote proxies for privately-held companies for which the Firm or its advisory representatives may have an interest.

A copy of LJPR, LLC's proxy voting policy is available upon request, as is information on how the Firm voted any client's specific proxies.

Financial Information

Financial Condition

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

A balance sheet is not required to be provided because LJPR, LLC does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

Business Continuity Plan

General

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

Disasters

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

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Information Security Program

Information Security

LJPR, LLC maintains an information security program to reduce the risk that your personal and confidential information may be compromised.

Privacy Notice

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

The categories of nonpublic information that we collect 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 will 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, 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, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to offer to deliver a *Privacy Notice* to you annually, in

writing. You will be notified as soon as any breach is discovered if any occurs. We will make all reasonable efforts to correct any problems a client encounters should a breach occur.