



# VANTAGE

---

## WEALTH MANAGEMENT, LLC

*a comprehensive approach to financial security*

## Investment Advisory Services

Offered by Vantage Wealth Management, LLC, a Registered Investment Advisor

Vantage Wealth Management, LLC (hereinafter referred to as Vantage) offers personalized investment advisory services to clients. Vantage's services, fee arrangements, disclosure information and Privacy Policy are described in the following pages.

Vantage Wealth Management  
1 Waters Park Dr. Ste. 210  
San Mateo, CA 94403  
(650) 638-9600  
Fax (650) 638-9604  
[www.vantagewealthmgmt.com](http://www.vantagewealthmgmt.com)

**This brochure provides information about the qualifications and business practices of Vantage Wealth Management. If you have any questions about the contents of this brochure, please contact us at (650) 638-9600. 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 Vantage Wealth Management also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Clients can search this site by using Vantage's name or by an identification number known as a CRD number. The CRD number for Vantage Wealth Management is 152374.**

**"Registered Investment Advisor" does not imply a certain level of skill or training.**

Changes from previously filed Form ADV Part 2:

David Val Fernelius, Brandy Navarro, Christopher Thomas, John Lee, Aaron Agte, and Mitone Griffiths are Investment Advisory Representatives of Vantage Wealth Management, a Registered Investment Adviser. John Lee joined Vantage Wealth Management in February 2015.

The broker dealer, Financial Telesis, Inc. was acquired by LPL Financial, Inc. in September 2014. All registered representatives that were licensed with the broker-dealer Financial Telesis, Inc. (Financial Telesis) are no longer registered with Financial Telesis and all Vantage Investment Advisory Representatives are currently Registered Representatives of the broker-dealer, LPL Financial, Inc.

Financial Planning and Asset Management services will continue to be provided through Vantage. If clients elect to have a representative of Vantage implement the advice provided as part of the financial planning services, implementation will be made through Vantage's Asset Management services described below or through a representative in the representative's capacity as a Registered Representative of LPL Financial, Inc.

In addition to SEI Asset Management Program and AssetMark Platform, Vantage uses LPL Strategic Wealth Management Platform to provide Asset Management services.

Changes in Form ADV Part 2 provided in 2014:

David Val Fernelius, Brandy Navarro, Christopher Thomas, Aaron Agte, and Mitone Griffiths are Investment Advisory Representatives of Vantage Wealth Management, a Registered Investment Adviser. These individuals have changed their Broker-Dealer relationship in their capacity as Registered Representatives. They are no longer Registered Representatives of Cambridge Investment Research, Inc.. They are now Registered Representatives of the Broker-Dealer, Financial Telesis, Inc.

Financial Planning and Asset Management services will continue to be provided through Vantage. If clients elect to have a representative of Vantage implement the advice provided as part of the financial planning services, implementation will be made through Vantage's Asset Management services described below or through a representative in the representative's capacity as a Registered Representative of Financial Telesis, Inc.

Now that Vantage is no longer affiliated with Cambridge Investment Research, Vantage no longer uses the Cambridge Managed Accounts Platform (CMAP) to provide Asset Management services. All accounts previously managed via CMAP have been transferred to another platform or are no longer being managed by Vantage.

## **Table of Contents**

Table of Contents .....	3
Advisory Business .....	4
Financial Planning Services.....	4
Asset Management Services .....	4
Fees and Compensation .....	6
Financial Planning Services.....	7
Asset Management Services .....	8
Performance-Based Fees.....	10
Types of Clients .....	10
Methods of Analysis, Investment Strategies and Risk of Loss.....	11
Disciplinary Information .....	11
Other Financial Industry Activities and Affiliations .....	11
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	12
Brokerage Practices.....	13
Review of Accounts .....	13
Client Referrals and Other Compensation .....	14
Custody.....	15
Investment Discretion .....	15
Voting Client Securities .....	15
Financial Information .....	15
Investment Advisory Representatives.....	16
David “Val” Fernelius, CFP® .....	16
Brandy M. M. Navarro, CFP® .....	16
Christopher J. Thomas, CFP® .....	16
Aaron M. Agte, CFP® .....	17
Mitone M. Griffiths.....	18

### **Advisory Business**

Vantage Wealth Management, LLC was established as a Limited Liability Company in the state of California in February 2007 with David “Val” Fernelius, Brandy M.M. Navarro and Christopher J. Thomas as the three founding partner and principal owners. David “Val” Fernelius is the Managing Member and President. John D. Lee joined Vantage in February 2015 as a Member. Brandy M.M. Navarro, Christopher J. Thomas, and John D. Lee are all Members of Vantage Wealth Management, LLC. Vantage Wealth Management, LLC (“Vantage”) registered with the SEC as a Registered Investment Advisor in February 2010.

Vantage provides personalized investment advisory services to clients via Financial Planning and Asset Management Services.

### **Financial Planning Services**

Financial Planning Services are established by a Financial Planning Agreement signed by the client and Vantage and are defined as providing financial advice and planning in the form of written financial plans and/or consultations. Financial planning services are usually prepared for each client before investments are transferred or changes initiated to portfolios transferred to Vantage. Vantage may also provide financial planning services on an on-going basis to clients seeking continuous evaluations of their financial situation. Financial planning services may be comprehensive or specific to an individual topic depending on the needs of the client. Comprehensive financial advice incorporates multiple topics and is usually provided in a written financial plan. When clients do not want a written financial plan, Vantage will provide its services in the form of consultations in order to discuss specific financial planning issues. The complexity of a client’s situation will determine the amount of time and depth provided towards financial planning. Topics covered under financial planning services may include, but not necessarily limited to, insurance planning, retirement planning, college planning, estate planning, asset allocation planning, and general investment planning.

### **Asset Management Services**

Asset Management Services are established by an Asset Management Agreement signed by the client and Vantage and are defined as giving continuous investment advice and making investment decisions for the client based on the individual needs of the client. Through this service, Vantage offers a customized and individualized investment program for clients. These accounts may be managed on either a discretionary or non-discretionary basis as agreed upon by the client and Vantage. Vantage actively manages client investment portfolios in accordance with the client’s individual needs, objectives and risk tolerance. A specific investment strategy and investment policy is crafted to focus on the specific client’s goals, objectives, risk tolerance and time frame. Vantage first determines an appropriate asset allocation, an appropriate mixture of asset classes, including, equities, fixed income, multiple capitalizations, domestic and

international exposure, to help the client best achieve their goals and objectives within their risk tolerance and time frame. Vantage then recommends a platform through which Vantage can offer the appropriate allocation. Vantage's Asset Management Services may be provided through three different platforms: (1) the SEI Asset Management Program, (2) AssetMark Platform, and (3) LPL Strategic Wealth Management Platform.

- (1) SEI Asset Management Program: For the SEI Program, SEI Private Trust Company serves as the custodian for assets of clients who wish to a) purchase SEI Mutual Funds as part of an SEI strategy allocation, b) participate in the SEI Separate Accounts Program, c) purchase non-SEI mutual funds and ETFs as part of an asset allocation recommended and managed by Vantage, and/or d) purchase or hold individual stocks and securities on an unsolicited basis, not recommended or managed by Vantage. Through this program, Vantage serves as the investment advisor to the investor, and is responsible for analyzing the investor's current financial situation, return expectations, risk tolerance, time horizon, and asset class preference, pursuant to the Vantage's investment advisory agreement. Based upon the investor's information, Vantage and the investor select an investment strategy and choose from one of many mutual fund asset allocation models, which may be provided by SEI Investments Management Corporation (SIMC), purchase the individual mutual funds, select from among SEI's Separately Managed Account portfolios, or implement the investment strategy with non-SEI mutual funds and ETFs.
- (2) AssetMark Platform: AssetMark Trust Company and Pershing provide custody for the AssetMark Platform, which is sponsored by AssetMark, Inc., a registered investment adviser. The AssetMark Platform has two options. The first is an Asset Allocation System that Vantage may use to manage client assets. It is made up of model portfolios provided by a number of institutional investment strategists. The portfolio designs are based on the information, research, asset allocation methodology and investment strategies of the investment strategists. The second option is a Privately Managed Account Program where AssetMark introduces clients to investment managers that Vantage recommends, who provide discretionary management of individual portfolios of equity securities, fixed income securities, mutual funds, and/or exchanged traded funds (ETFs).

AssetMark Platform client fees are payable quarterly, in advance, based on the average market value of assets under management during the previous quarter. Vantage, AssetMark, the investment strategists who design the portfolios, and others who provide support services for the AssetMark Platform may receive a portion of the fee paid by the client.

The maximum advisory fee charged to clients will not exceed 2.25% per year. Custodian fees may be charged separately from the AssetMark Platform client fees. The

amount of the advisory fee charged by Vantage and paid by the client depends on a variety of factors. Vantage may retain up to 1.35% of the total fees charged to client for its role as investment adviser.

A condition of participation in the AssetMark Platform is that all accounts are held at Pershing Advisor Solutions or AssetMark Trust Company. Pershing Advisor Solutions or AssetMark serve as Custodian for Retirement Accounts. Execution and clearance of transactions is provided by Pershing or AssetMark Trust Company. As a result, best execution may not be achieved.

A complete description of the AssetMark Platform and related fees and charges can be found in the AssetMark Schedule H Disclosure Brochure, which will be provided to all clients prior to or at the time an account is established. Clients should carefully review the AssetMark Disclosure Brochure prior to establishing an account.

- (3) LPL Strategic Wealth Management (SWM) Platform: SWM accounts will be custodied at LPL Private Trust Company (PTC), a broker-dealer member of the Financial Industry Regulatory Authority (FINRA). LPL, Inc., (LPL) a registered broker-dealer, member FINRA/SIPC, serves as the introducing broker-dealer for these accounts and clears securities transactions on a fully disclosed basis through PTC. For accounts established through the SWM program, an associated person of Vantage will have trading authorization over the account in the associated person's separate capacity as a registered representative of LPL. Vantage implements a recommended asset allocation with stocks, bonds, mutual funds, and/or exchange traded funds

As of January 29<sup>th</sup>, 2015 Vantage manages \$174,396,793 in 623 accounts on a discretionary basis and manages \$626,042 in 1 account on a non-discretionary basis, for a total of \$175,022,835 in 643 accounts.

### **Fees and Compensation**

For Financial Planning Services a fixed financial planning fee is determined in advance and agreed upon in the Financial Planning Agreement. For One-Time Financial Plans the fee is usually between \$3,000 and \$5,000. For On-Going Financial Planning the fee is usually \$2,500 per year. For As-Needed Financial Advice Vantage usually charges a fee of \$250 per hour.

Fees payable to Vantage for its Asset Management Services are based on a percentage of assets under management. Vantage may charge up to 2.00% per year, but usually charges according to the following fee schedule:

First \$500,000 - (1.35%)  
Next \$1.5 Million [\$500,001 - \$2.0 Million] - (.85%)  
Next \$1.0 Million [\$2,000,001 - \$3.0 Million] - (.70%)  
Next \$1.0 Million [\$3,000,001 - \$4.0 Million] - (.55%)  
Next \$1.0 Million [\$4,000,001 - \$5.0 Million] - (.35%)  
Over \$5.0 Million - (.15%)

#### Financial Planning Services

For One-Time Financial Plans a fixed fee is charged, typically ranging from \$3,000-\$5,000, but Vantage may charge anywhere from \$0 to \$30,000 depending on the complexity of the situation. Fees are determined based on the complexity of the client's financial situation and the services that will be provided as well as the advisor representative providing the services. Vantage charges an initial retainer fee equal to 50% of the total fee. The initial retainer is due at the time the Financial Planning Agreement is signed. The remainder of the fee will be due upon completion and presentation of the written financial plan or completion of the consultation services. The exact amount of the fee is determined in advance and is disclosed in the Financial Planning Agreement. One-time financial planning services are terminated upon presentation of the written financial plan or completion of the consultation services and the remainder of the financial planning fee is paid to Vantage. The client may terminate one-time services at any time with no penalty by providing notice to Vantage. However, in the event services are terminated prior to the completion of the financial plan, the client will be responsible for the amount of time expended by Vantage prior to notice of termination.

Vantage may also provide Ongoing Financial Planning services, usually for a fee of \$2,500 per year but may range from \$0 to \$15,000 per year. On-going financial planning services may be used to monitor and update an initial financial plan. These services are provided to clients that would benefit from on-going reviews and updates to their financial situation. At least annually, Vantage will provide an in-depth analysis of the client's financial situation. On a more frequent basis (for example quarterly), Vantage is available to answer client questions and provide as-needed consultations. The annual fee for Vantage's ongoing services will be determined at the time the initial agreement is executed. Fees are divided and billed into equal monthly or quarterly payments as agreed upon by Vantage and the client. The annual fixed-fees are determined based on factors such as the amount of the client's assets, the complexity of the client's financial situation, the advisor representative working with the client, and the estimated amount of Vantage's time that will be needed throughout the year. The annual fee will automatically carry over from year to year unless both parties agree, in writing, to a different fee. Fees are typically deducted directly from a client's investment or bank account. Clients must provide the custodian with written authorization to have fees deducted

from the account and paid to Vantage. The custodian will send client statements, at least quarterly, showing all disbursements for the account including the amount of the advisory fee, if deducted directly from the account. Either party may terminate ongoing services at any time. If services are terminated within five (5) business days of executing the agreement, services will be terminated without penalty and no fees shall be due. If services are terminated after the initial five day period, the final fee will be pro-rated and charged to the client as calculated on the date of termination. In the event a client terminates services, termination shall be effective from the time Vantage receives notification or such other time as may be mutually agreed upon. There will be no penalty charge upon termination. In the event Vantage terminates the relationship, the agreement will be terminated on the fifth day after written notification is delivered to the client or such time as may be mutually agreed upon and subject to the final payment of advisory fees.

Finally, Vantage may occasionally offer As-Needed Financial Planning Services and charge an hourly fee for limited advice/analysis instead of a flat fee. Under this type of arrangement, Vantage usually charges a fee of \$250 per hour, but may range from \$0 to \$500 per hour. Fees for this service are billed via invoice upon completion of the service. Either party may terminate services by providing notice to the other party.

While financial planning services are prepared with the intention of the client implementing recommendations made within the plan through Vantage, clients are not obligated to do so. If clients elect to have an representative of Vantage implement the advice provided as part of the financial planning services, implementation will be made through Vantage's Asset Management services described below or through a representative in the representative's capacity as a registered representative of LPL Financial, Inc. Clients may also be solicited to purchase a fixed-insurance product through Vantage's representatives in their separate capacities as insurance agents. In these situations Vantage may waive or reduce the amount of the financial planning fee as a result of the additional fees and/or commissions being earned. Any adjustment to the financial planning fee is at the discretion of Vantage and will be disclosed to client prior to implementing transactions.

#### Asset Management Services

While the fee schedule indicated above is typical for most Vantage clients, Vantage may offer some clients a lesser or greater fee schedule or a flat percentage for all assets. The annual fee calculated as a percentage of assets under management may range from 0.00% to 2.00%. The annual fee for Vantage's services is divided and billed quarterly in arrears based on the value of the account at the end of the previous quarter, unless specifically indicated by the asset management program. (For example, AssetMark charges the quarterly fee in advance.) The initial fee will be pro-rated based on the number of days the account is opened during the



initial period. Fees are deducted directly from the client's account. Clients must provide the custodian with written authorization to have fees deducted from the account and paid to Vantage. The qualified custodian will send client statements, at least quarterly, showing all disbursements for the account including the amount of the advisory fee, if deducted directly from the account. Each custodian may assist Vantage with the calculation and automatic deduction of the quarterly fee. Vantage will provide instructions to the qualified custodian to deduct the calculated fee. It is Vantage and client's responsibility to verify the accuracy of Vantage's fee calculation and the qualified custodian will not determine whether the fee has been properly calculated.

It should be noted that fees for Vantage's services may be higher or lower than fees charged by other financial professionals offering similar services.

Clients may incur certain charges imposed by third parties other than Vantage in connection with financial planning and investment recommendations provided by Vantage and investments made through the account, including but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges, variable annuity fees and surrender charges, brokerage custodial fees, transaction costs and IRA and qualified retirement plan fees. A description of mutual fund, variable annuity, and variable life fees and expenses are available in the mutual fund prospectus and offering documents. For some accounts, transaction and execution fees charged by the custodian may be paid by Vantage and not billed directly to the client. Vantage will choose for each client, on a case by case basis, whether Vantage will assume transaction costs and ticket charges or if these costs will be paid by the client. If Vantage chooses not to assume these costs, transaction and execution costs will be billed to the client separate from Vantage's management fee.

Management fees charged by Vantage are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to clients. A description of these fees and expenses are available in each investment company security's prospectus. For some accounts, Vantage's associated persons, in their separate capacity as registered representatives of LPL Financial may retain a portion of the commissions charged to the client. These commissions may include mutual fund sales loads, 12b-1 fees and surrender charges, surrender charges, and IRA and qualified retirement plan fees. These commissions may present a conflict of interest and gives Vantage an incentive to recommend investment products based on the compensation received, rather than on a client's needs. Vantage addresses this conflict by preferring fee-based investment advisory accounts over commission-based brokerage accounts whenever possible. Unless specifically opposed by the client, Vantage will recommend purchasing mutual funds and exchange traded funds (ETFs) in a fee-based investment advisory account so that mutual funds can be purchased at Net Asset Value

(NAV) and the trading commission can be waived on buys and sells of ETFs. For products that are not able to be purchased in a fee-based investment advisory account and must be purchased through Vantage's capacity as a registered representative, such as variable annuities, all costs and expenses are disclosed to the client. Vantage does not regularly recommend "no-load" mutual funds because Vantage charges a management fee for asset management separate from a mutual fund sales load and in a fee-based investment advisory account all mutual funds can be bought at NAV, that is, without a sales load. Vantage may recommend "no-load" mutual funds, but will do so based on criteria other than the sales load.

Clients wishing to implement Vantage's advice are free to select any broker they wish and are so informed. If clients wish to have Vantage's associated persons implement the advice in their capacity as registered representative, then the associated persons' broker/dealer, LPL Financial, will be used. Associated persons of Vantage are registered representatives of LPL Financial and are required to use the services of LPL Financial and LPL Financial's approved clearing broker-dealers when acting in their capacity as registered representatives. LPL Financial serves as the introducing broker-dealer. All accounts established through LPL Financial will be cleared and held at LPL Financial Private Trust Company. LPL Financial has a wide range of approved securities products for which they perform due diligence prior to selection. LPL Financial's registered representatives are required to adhere to these products when implementing securities transactions through LPL Financial. Commissions charged for these products may be higher or lower than commissions clients may be able to obtain if transactions were implemented through another broker/dealer. Because the associated persons of Vantage may also be registered representatives of LPL Financial, LPL Financial provides compliance support to Vantage's associated persons. In addition to compliance support, LPL Financial also provides the associated persons of Vantage, and therefore the Vantage, with back-office operational, technology, and other administrative support.

### **Performance-Based Fees**

Vantage does not accept performance-based fees.

### **Types of Clients**

Vantage provides services to, but not necessarily limited to, individuals, trusts, charities, pension/profit sharing plans, corporations and/or small businesses. Vantage's primary focus is on helping clients reach retirement and/or financial independence. Often a client's situation may involve multiple entities. For example, a small business owner may have his or her individual retirement as a primary goal, but establishing an employer-sponsored retirement plan and planning for an eventual succession may best help the individual client achieve his or her goals. Usually, advice provided by Vantage to an entity, such as a trust, corporation or

pension, is in conjunction with advice provided to individuals related to the entity. Vantage imposes a minimum investment amount of \$50,000 for its asset management services. However, exceptions to this minimum may be granted at the discretion of Vantage.

### **Methods of Analysis, Investment Strategies and Risk of Loss**

Vantage actively manages client investment portfolios in accordance with the client's individual needs, objectives and risk tolerance. A specific investment strategy and investment policy is crafted to focus on the specific client's goals, objectives, risk tolerance and time frame. Vantage first determines an appropriate asset allocation, an appropriate mixture of asset classes, including, equities, fixed income, multiple capitalizations, domestic and international exposure, to help the client best achieve their goals and objectives within their risk tolerance and time frame. Vantage then recommends a platform through which Vantage can offer the appropriate allocation. Vantage's Asset Management Services may be provided through two different platforms: (1) the SEI Asset Management Program and (2) AssetMark Platform. Vantage primarily uses mutual funds and exchange traded funds to create an asset allocation with exposure to multiple asset classes. Vantage monitors and manages strategic and tactical asset allocations. A strategic asset allocation determines an appropriate asset allocation and regularly, usually quarterly, rebalances back to the recommended asset allocation. A tactical asset allocation may alter the recommended distribution of asset classes based on projected performance and volatility of each asset class.

Within each asset class, the methods Vantage uses to analyze various securities include charting, fundamental, technical and cyclical. Key factors include, but are not limited to, performance and performance relative to peer group, volatility & risk, costs and expense ratio, purity (that is, how accurately a given investment reflects its stated asset class) and management tenure. For non-qualified accounts Vantage will also consider factors that would affect the client's individual tax situation, for example, seeking funds with low turnover or exposure to state specific municipal bonds instead of corporate bonds.

Despite some asset classes being less volatile than others, all investments in securities involve the risk of loss that clients should be prepared to bear.

### **Disciplinary Information**

Vantage Wealth Management and its advisory affiliates have had no disciplinary event.

### **Other Financial Industry Activities and Affiliations**

Christopher Thomas, a Member and Advisor Representative of Vantage, also owns an accounting firm, Thomas & Co. If clients of Vantage are in need of tax or accounting services,

they may be referred to Thomas & Co. Fees for tax and accounting services will be billed separately from advisory fees. Clients are not obligated in any manner to use Thomas & Co. No fee sharing arrangements exist between Vantage and Thomas & Co. However, clients should be aware that Christopher Thomas will benefit from referring clients to the accounting firm since he is affiliated with both companies.

Mr. Thomas spends the majority of his time, approximately 85%, focused on the accounting services provided by Thomas & Co. Mr. Thomas is the only supervised person of Vantage that spends the majority of his time devoted to something other than providing investment advice.

#### Referrals to the Law & Mediation Offices of Paul G. Minoletti

When deemed prudent based on the needs of individual clients, Vantage will refer clients to the Law & Mediation Offices of Paul G. Minoletti. Vantage and Mr. Minoletti share office space which is the primary reason Vantage refers clients to Mr. Minoletti. A referral should not be the sole determining factor for selecting an attorney. Therefore, Vantage recommends clients conduct a thorough review of Mr. Minoletti prior to engaging him for legal services. Further, clients should compare Mr. Minoletti against other law firms prior to making a final decision to hire Mr. Minoletti. From time to time, Mr. Minoletti may refer his clients in need of professional investment advisory services to Vantage. No fee sharing or referral payment arrangements exist between Vantage and Mr. Minoletti. Vantage's clients are not required to use the legal services of Mr. Minoletti and Mr. Minoletti's legal clients are not required to use the services of Vantage.

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

Section 204A-1 of the *Investment Advisers Act of 1940* requires all investment advisers to establish, maintain and enforce a Code of Ethics. Vantage has established a Code of Ethics that will apply to all of its supervised persons. An investment adviser is considered a fiduciary according to the *Investment Advisers Act of 1940*. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. Vantage has a fiduciary duty to all clients. This fiduciary duty is considered the core underlying principle for Vantage's Code of Ethics which also covers its Insider Trading and Personal Securities Transactions Policies and Procedures. Vantage requires all of its supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and when changes occur, all supervised persons will sign an acknowledgement that they have read, understand and agree to comply with Vantage's Code of Ethics. Vantage has the responsibility to make sure that the interests of all clients are placed

ahead of Vantage's or its supervised person's own investment interest. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to any services being conducted. Vantage and its supervised persons must conduct business in an honest, ethical and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of Vantage's Code of Ethics. However, if a client or a potential client wishes to review Vantage's Code of Ethics in its entirety, a copy will be provided promptly upon request.

Vantage and its associated persons may buy or sell securities that are also recommended to clients. In order to minimize this conflict of interest, securities recommended by Vantage are widely held and publicly traded. In addition, in accordance with its fiduciary duty to clients, Vantage and its associated persons will place client interests ahead of their own interests.

### **Brokerage Practices**

Clients wishing to implement Vantage's advice are free to select any broker they wish and are so informed. If clients wish to have Vantage's associated persons implement the advice in their capacity as registered representative, then the associated persons' broker/dealer, LPL Financial, will be used. Associated persons of Vantage are registered representatives of LPL Financial and are required to use the services of LPL Financial and LPL Financial's approved clearing broker-dealers when acting in their capacity as registered representatives. LPL Financial serves as the introducing broker-dealer. All accounts established through LPL Financial will be cleared and held at LPL Financial Private Trust Company or held direct at the investment company, with LPL Financial having supervisory oversight. LPL Financial has a wide range of approved securities products for which LPL Financial performs due diligence prior to selection. LPL Financial's registered representatives are required to adhere to these products when implementing securities transactions through LPL Financial. Commissions charged for these products may be higher or lower than commissions clients may be able to obtain if transactions were implemented through another broker/dealer. Because the associated persons of Vantage may also be registered representatives of LPL Financial, LPL Financial provides compliance support to Vantage's associated persons. In addition to compliance support, LPL Financial also provides the associated persons of Vantage, and therefore the Vantage, with back-office operational, technology, and other administrative support.

### **Review of Accounts**

Managed accounts are reviewed at least semiannually. The calendar is the main triggering factor, although more frequent reviews may also be triggered by changes in the client's circumstances, client request, or changes within the market. Triggering factors for

changes to underlying portfolios include the relative valuation changes between asset classes, deviation from management style by fund, or fund closures. Clients will be contacted periodically by Vantage to discuss the management and performance of their account and changes in their situation which may have an impact on the management of their account.

Clients contracting for ongoing financial planning services will receive periodic updates of their financial plan and/or situation. In-depth analyses are conducted at least annually with more periodic monitoring provided throughout the year.

David “Val” Fernelius, Brandy Navarro, Christopher Thomas, John Lee, and Aaron Agte are primarily in charge of providing all investment advice and conducting the on-going review of all accounts.

Clients will receive account statements at least quarterly from their qualified custodian. SEI clients may receive quarterly performance and/or position reports from SEI. AssetMark clients may receive quarterly performance and/or position reports from AssetMark.

#### **Client Referrals and Other Compensation**

Certain product sponsors and third-party money manager platforms (including SEI’s Marketing Support Program) provide Vantage and its representatives with other economic benefits as a result of sales activities directed to the sponsors and third-party money managers, including but not limited to, financial assistance or the sponsorship of conferences and educational sessions, marketing support, incentive awards, payment of travel expenses, tools to assist Vantage in providing various services to clients such as reporting programs and portfolio analysis.

Vantage’s associated persons are licensed as independent insurance agents. When clients purchase insurance products through them in their separate capacity as insurance agents, they receive commissions and other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of this compensation may affect the judgment of Vantage’s associated persons when recommending products to its clients.

While Vantage’s associated persons endeavor at all time to put the interest of the clients first as a part of Vantage’s fiduciary duty, clients should be aware that the receipt of commission and additional compensation itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations.

Vantage’s associated persons, in their capacities as registered representatives of LPL Financial, may receive commissions from the execution of securities transactions. In addition, they may receive 12b-1 fees from certain mutual fund companies as outlined in the fund’s prospectus. 12b-1 fees come from fund assets, therefore, indirectly from client assets. The

receipt of such fees could represent an incentive for IARs to recommend funds with 12b-1 fees over funds that have no fees or lower fees. As a result, there is a potential conflict of interest.

Christopher Thomas provides accounting and tax preparation services in a separate capacity through Thomas & Co. Accounting and tax preparation services are separate from advisory services provided by Vantage. Clients electing to contract for tax preparation services will enter into a separate agreement with Thomas & Co. and pay a separate fee. Vantage's clients are not required to use the services of Thomas & Co.

### **Custody**

Custody of client funds and securities is maintained by one of the four qualified custodians that provide platforms for Asset Management Services offered by Vantage; (1) SEI Private Trust Company provides custody for the SEI Asset Management Program and (2) AssetMark Trust Company or Pershing, LLC provides custody for the AssetMark Platform. Each qualified custodian sends account statements at least quarterly, if not more frequently. Vantage does not provide separate statements.

### **Investment Discretion**

Upon approval and agreement by a client, Vantage can provide asset management services on a discretionary basis. Vantage's discretionary authority will be granted by the client in the client agreement. When discretionary authority is granted, it is limited in that Vantage will only be given discretionary trading authority. This authority will allow Vantage to determine the type of securities and the amount of securities that can be bought or sold for the client portfolio without obtaining the client's consent for each transaction.

### **Voting Client Securities**

Vantage does not vote proxies on behalf of its clients. It is the responsibility of the client to vote all proxies for securities held in managed account.

### **Financial Information**

Vantage does not require nor solicit prepayment of more than \$1,200 in fees per client six months or more in advance. Vantage has discretionary authority of client funds and securities, but there is no financial condition that is reasonably likely to impair Vantage's ability to meet contractual commitments to clients. Discretion is limited to trading authority.

## **Investment Advisory Representatives**

David “Val” Fernelius, CFP® Born: 1955

### *Education Background*

A.S. in Chemistry from Canada College, 1976

### *Business Background*

Vantage Wealth Management, LLC, Managing Member and President since February 2007 and Investment Advisor Representative since January 2010;

LPL Financial, Inc., Registered Representative since September 2014;

Financial Telesis, Inc., Registered Representative April 2014 – September 2014;

Cambridge Investment Research, Inc., Registered Representative January 2010 – March 2014; and

Securian Financial Services, Inc., Registered Representative and Investment Advisor Representative, April 1999 – December 2009.

Brandy M. M. Navarro, CFP® Born: 1980

### *Education Background*

B.S. in Economics from Santa Clara University, 2001

### *Business Background*

Vantage Wealth Management, LLC, Member since February 2007 and Investment Advisor Representative since January 2010;

LPL Financial, Inc., Registered Representative since September 2014;

Financial Telesis, Inc., Registered Representative April 2014 – September 2014;

Cambridge Investment Research, Inc., Registered Representative January 2010 – March 2014; and

Securian Financial Services, Inc., Registered Representative and Investment Advisor Representative, November 2001 – December 2009.

Christopher J. Thomas, CFP® Born: 1965

### *Education Background*

B.S. in Accounting from San Jose State University, 1989

M.S. in Taxation (emphasis in Estate Planning) from Golden State University, 1997



*Business Background*

Vantage Wealth Management, LLC, Member since February 2007 and Investment Advisor Representative since January 2010;  
LPL Financial, Inc., Registered Representative since September 2014;  
Financial Telesis, Inc., Registered Representative April 2014 – September 2014;  
Cambridge Investment Research, Inc., Registered Representative January 2010 – March 2014;  
Thomas & Co., Owner and Accountant since November 1997; and  
Securian Financial Services, Inc., Registered Representative and Investment Advisor Representative, March 2001 – December 2009.

John D. Lee, CFP® Born: 1967

*Education Background*

B.A.S in Sociology and VTSS (Values, Technology, Science, and Society) from Stanford University, 1990  
M.B.A from Stanford University, 1995

*Business Background*

Vantage Wealth Management, LLC, Member since February 2015 and Investment Advisor Representative since February 2015;  
Securian Financial Services, Inc., Registered Representative and Investment Advisor Representative, September 2006 – February 2015;  
Pure Digital Technologies, June 2002 – August 2006.

Aaron M. Agte, CFP® Born: 1983

*Education Background*

B.S. in Applied Mathematics and B.A. in Philosophy from University of California – Los Angeles (UCLA), 2005

*Business Background*

Vantage Wealth Management, LLC, Employee and Director of Financial Planning since August 2008 and Chief Compliance Officer and Investment Advisor Representative since January 2010;  
LPL Financial, Inc., Registered Representative since September 2014;  
Financial Telesis, Inc., Registered Representative April 2014 – September 2014;  
Cambridge Investment Research, Inc., Registered Representative January 2010 – March 2014;

Securian Financial Services, Inc., Registered Representative and Investment Advisor Representative, October 2008 – December 2009.  
Guaranty Brokerage Services, Inc., Registered Representative, October 2007 – August 2008;  
Guaranty Bank, Personal Banker, October 2007 – August 2008;  
Ameriprise Financial Services, Inc., Registered Representative and Investment Advisor Representative, December 2005 – September 2007; and  
University of California – Los Angeles, Full Time Student, September 2001 – September 2005.

**\*Val Fernelius, Brandy Navarro, Christopher Thomas, John Lee, and Aaron Agte** are CERTIFIED FINANCIAL PLANNER™ certificants or CFP® certificants and according to CFP® Rules of Conduct, they must provide their clients with contact information, information about the services they provide, any conflicts of interest that they may have related to the provision of services, and the costs to clients associated with the services being provided. These important disclosures are contained in this Schedule F document. Descriptions of the specific advisory and financial planning services provided to each client are contained in each client's agreement with Advisor.

Mr. Fernelius, Ms. Navarro, Mr. Thomas, Mr. Lee, and Mr. Agte have acknowledged their responsibility as CFP® certificants to adhere to the standards that have been established in the CFP® Board's Standards of Professional Conduct. If a client of Advisor believes Mr. Fernelius, Ms. Navarro or Mr. Thomas, Mr. Lee, or Mr. Agte's conduct may violate the Standards of Professional Conduct, Advisor's client may file a complaint with the CFP® Board at [www.CFP.net/complaint](http://www.CFP.net/complaint). Please contact Mr. Fernelius, Ms. Navarro, Mr. Thomas, Mr. Lee, or Mr. Agte if you have any questions regarding the CFP® designation or these disclosures.

Mitone M. Griffiths Born: 1973

#### *Education Background*

B.A in Economics and B.A in Spanish from Simmons College, 1995

#### *Business Background*

Vantage Wealth Management, LLC, Director of Client Relations and Business Development since November 2007 and Investment Advisor Representative since January 2010;  
LPL Financial, Inc., Registered Representative since September 2014;  
Financial Telesis, Inc., Registered Representative April 2014 – September 2014;  
Cambridge Investment Research, Inc., Registered Representative January 2010 – March 2014;  
Securian Financial Services, Inc., Registered Representative and Investment Advisor Representative, November 2007 – December 2009; and  
Coldwell Banker, Real Estate Agent, November 2003 – November 2007.