



## Item 1 – Cover Page

### FORM ADV PART 2

Empirical Financial Services, LLC d/b/a Empirical Wealth Management  
1420 5<sup>th</sup> Ave – Suite 3150, Seattle, WA 98101  
(206) 923-3474  
Empirical.net

December 30, 2014

This Brochure provides information about the qualifications and business practices of Empirical Financial Services, LLC d/b/a Empirical Wealth Management. If you have any questions about the contents of this Brochure, please contact us at (206) 923-3474 and/or [compliance@empirical.net](mailto:compliance@empirical.net). 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.

Empirical Financial Services, LLC d/b/a Empirical Wealth Management is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Empirical Financial Services, LLC d/b/a Empirical Wealth Management also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's website also provides information about any persons affiliated with EFS who are registered, or are required to be registered, as investment adviser representatives of EFS.

## **Item 2 – Material Changes**

We update this document annually, or more frequently in the event of certain material changes. This section outlines and summarizes the specific changes made since the document was previously updated. We will deliver a copy of this section to you within 120 days of the close of our fiscal year to make sure you are aware of any material changes to our firm's business philosophies or practices.

This disclosure document, dated November 3, 2014, includes the material changes below since the last annual update of this document on March 11, 2014. You may request a full copy of the latest version of this document at any time by contacting the compliance department at [compliance@empirical.net](mailto:compliance@empirical.net).

Amendments:

## **Item 4: Advisory Business**

Anita Gray is no longer an employee of Empirical Wealth Management. Effective December 30, 2014

Annette DeLong is no longer an employee of Empirical Wealth Management. Effective October 31, 2014

Jordan Taylor is no longer an employee of Empirical Wealth Management. Effective October 31, 2014

Michael Van Sant is no longer an employee of Empirical Wealth Management. Effective May 22, 2014

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

Empirical Financial Services started Directional Financial Services LLC. Effective June 29, 2014

Elliott Appel obtained an insurance producer license in the State of Washington, authorizing him to sell life insurance through Empirical Insurance, LLC. Effective June 30, 2014

## **Item 14: Client Referrals and Other Compensation**

Empirical Financial Services is no longer a member of NAPFA and therefore will no longer be receiving client referrals from NAPFA. Effective July 1, 2014

## **Item 15: Custody**

Empirical Financial Services has entered into a relationship with TD Ameritrade to custody client assets. Current clients will not be switched to the new custodian unless a request is made by the client to switch. Effective August 21, 2014

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#### **Item 4 – Advisory Business**

We provide investment management services on a fee-only basis. Your portfolio is continuously managed based on your investment objective. However, you have the opportunity to place reasonable restrictions on the types of investments to be held in your accounts.

Kenneth Smith started Empirical Financial Services, LLC (EFS) in October 2010. The company is a spin-off from Empirical Wealth Management, an Oregon LLC that Ken was a founding member of in 2006. On December 31, 2012, EFS purchased Empirical Wealth Management from its' remaining original members, re-merging companies as a Washington LLC. Kenneth Smith is the principal owner. Jack Monteith, Ethan Broga, and Lorne Enquist are minority owners.

#### **Investment Advisory Services**

Advisory services encompass a wide range of investment objectives, from conservative to aggressive, giving you and your advisor the flexibility to design a portfolio and asset allocation that meets your specific investment needs. Your portfolio is continuously managed based on your investment objective and we maintain ongoing and continuous discretionary authority for your accounts. We can execute our investment recommendations in accordance with the Investment Policy Statement on your behalf, without the approval of each specific transaction, unless specifically restricted by you. We will choose which model is appropriate for you based upon the items discussed above. We offer several investment portfolios designed to meet various needs, but portfolios are not designed specifically for each client.

You have the opportunity to impose restrictions on investing in certain securities or types of securities. Account restrictions are generally for tax purposes in situations where you may incur a large amount of taxable gain from the sale of your positions. In these cases, we may code the positions as "Legacy" and not to be traded, may determine a strategy with you for slowly getting out of the position over time, or may require you to transfer assets into a separate "non-discretionary" account. We do not accept responsibility for non-standard positions inside your account, either brought in or bought at your instructions, but not generally purchased in client portfolios as part of our investment portfolio. We will allow these positions to be held in your managed account and may charge fees for such, but will not be held responsible for their performance or monitoring.

We recognize that as individuals, you have unique goals and interests. As such, we tailor our advisory services to your individual needs. We begin by offering a comprehensive financial plan that helps us to create a picture of your financial condition as well as learn about your personal financial goals. The plan also acts as a tool, which helps you clarify your investment and life objectives. Out of this plan and with your input, an investment strategy and asset allocation decisions are agreed upon.

We may, on occasion, recommend that all or a portion of the assets in your account be managed by an outside investment manager or sub-adviser. Sub-advisory fees are paid by us from our advisory fees and will not result in increased fees to you. In all discretionary accounts, except to the extent

that you direct otherwise, we are authorized to use our discretion in selecting or changing a sub-adviser and/or outside money manager to the account without prior approval from you. You may be required to execute a limited power of attorney with a sub-adviser selected by us.

### **Financial Planning Services**

We may occasionally engage in stand-alone financial planning services to non-advisory clients. We will meet with potential financial planning clients in advance of beginning preparation of a plan to determine the amount to be billed. A financial planning contract will be signed before services commence. Financial planning consists of assisting the client in defining personal financial planning goals and objectives to be pursued in various areas which include, but are not limited to:

- Business planning
- Small business retirement savings strategies
- Pension consulting
- Children's education
- Retirement planning
- Retirement cash flow planning
- Estate planning
- Tax planning
- Insurance coverage review
- Long-term care insurance review
- Disability protection
- Stock option and deferred compensation plan strategies
- 10b(5)-1 predetermined trading plans
- 401(k) recommendations
- Investment account aggregation advice
- Asset protection services

You may not wish to engage in the financial planning portion of our service, but these services are available to you as part of your quarterly fee or on a flat-fee basis for non-advisory clients.

Providing financial planning services may cause a conflict of interest between our interest and the interest of our client. The following disclosure is made in the case where a conflict of interest does exist: a) a conflict of interest exists between our interests and the interest of our client; b) our client is not obligated to act upon our recommendation; and c) if the client elects to act on any of the recommendations, the client is not obligated to effect the transaction through us.

### **Tax Preparation Assistance**

We also offer tax preparation and electronic filing services to you by partnering with SurePrep, LLC and Pyramid Financial + Tax. The only tax returns eligible for this service are Forms 1040 – U.S. Individual Income Tax Return. SurePrep, LLC provides both offshore (outside the United States) and onshore (inside the United States) preparation of personal tax returns and makes tax returns available to us on their secure electronic network. Pyramid Financial + Tax is a Phoenix, AZ based

CPA firm with a Seattle area office. They prepare the returns in house and deliver them to our clients. Providing Tax Prep Assistance through Pyramid Financial + Tax may cause a conflict of interest between our interest and the interest of our client. While we endeavor to act in the best interest of our clients, the recommendation of Pyramid's Tax Prep Services may be based, in part, on the fact that we own a separate business as a joint venture with Pyramid Financial + Tax.

Clients with assets under management above \$1,000,000 will receive this service at a significant discount and in some cases at no additional cost above their management fee. Clients with assets under management below \$1,000,000 will be charged a nominal fee, in addition to their management fee if they want to engage in this service.

### **Pension Consulting Services**

We have a service for outside account aggregation. If you would like us to link to and make recommendations for your outside account(s) through your employer, you may sign up for our aggregation service which utilizes ByAllAccounts services. This will allow us to have a complete view of your linked outside holdings. We will offer advice and recommendations on the outside accounts but it will be your sole responsibility to implement allocation recommendations in these outside accounts linked to us for viewing purposes. You only give us access to view accounts or to view, make recommendations and monitor the outside accounts. Should you choose to allow us to view, make recommendations and monitor outside accounts, you may be charged a fee, which will be deducted from your managed account. Fees will not be deducted directly from outside accounts.

As of August 20, 2014, EFS manages \$906,220,205 on a discretionary basis and \$27,093,422 on a non-discretionary basis.

## **Item 5 – Fees and Compensation**

### **Investment Advisory Services**

The specific manner in which we charge fees is established in your written agreement with us. In consideration of our services hereunder, you will pay us a fee quarterly. Lower fees for comparable services may be available from other sources. All fees are negotiable. There is a minimum annual fee of \$10,000, which may be waived at the advisor's discretion. We may modify these terms on at least 30 days prior written notification or upon execution of a new contract.

Assets	Portfolio Annual Fee*
First \$2,000,000	1.00%
\$2,000,001 - \$5,000,000	.80%
\$5,000,001 - \$10,000,000	.70%
\$10,000,000 - \$20,000,000	.50%
Above \$20,000,000	.30%

\*Annual Fee is charged over a four (4) quarter period (example:  $1.00\%/4 = .25\%$  per quarter)

Some clients will pay different fees based upon their contract fee schedules. We will not treat higher paying clients more favorably. Fees are due and payable on the first day of each calendar quarter and are generally deducted directly from your accounts.

New clients will be billed quarterly in arrears using an average daily balance calculation. Existing clients, currently billed quarterly in advance, will be transitioned to the average daily balance computation over time. The fee for those clients paying quarterly in advance will be calculated using the fee schedule listed above, multiplied by the market value of the account on the last day of the quarter. The fee for clients under the average daily balance fee schedule is calculated by using the fee schedule above, multiplied by the average market value of the account during the preceding quarter and is billed in arrears.

If you are billed in advance, fees for partial quarters, at the commencement or termination of your Advisory agreement, will be prorated based on the number of days the account was funded during the quarter. Significant contributions and/or withdrawals of \$100,000 or more, taking place within the first ten (10) weeks of the calendar quarter will also be rebated or billed on the above pro-rated basis. Margin debt is considered managed and will not be excluded from billing or offered billing rebates.

You may withdraw or terminate the relationship at any time by submitting a request to disassociate to either us or the Custodian in writing. Termination will be considered effective immediately and prorated fees will be refunded within fourteen (14) days if paid in advance. If your fee is calculated using average daily balance, you will be directly billed before being delinked, or invoiced with payment due immediately upon receipt, for any balance due and owing.

We receive fees based on assets under management. However, other fees may be required from other companies, such as custodians, brokers or investment products, involved with the assets or trading of assets. These fees are your responsibility and are separate and in addition to our management fees. We endeavor to use investment products with the most competitive internal expenses within their asset class and custodians with competitive pricing and services. Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

The following fees are paid directly from your account:

- Mutual funds and index fund internal expenses
- Margin interest (if applicable)
- Wire transfer fees
- Custodial fees for holding non-standard assets (i.e. alternative investments)
- Brokerage commissions
- Custodial fees
- Services charges
- Stock transfer fees

## **Financial Planning Services**

For non-advisory clients who would like to engage in stand-alone financial planning, the fees are paid on an hourly or fixed fee basis. Hourly rates are \$300 per hour, while fixed fees may range from \$500 - \$10,000, depending on the complexity of the plan.

### **Item 6 – Performance-Based Fees and Side-By-Side Management**

In some cases, we have entered into performance fee arrangements with qualified clients: such fees are subject to individualized negotiation with each such client. We will structure any performance fee arrangement subject to Section 205(a) (1) of the Investment Advisors Act of 1940 (The Advisors Act) in accordance with the available exemptions thereunder, including the exemption set forth in Rule 205-3. The performance based fee would be a given percentage of any return earned in the account(s) over the previous quarter and is billed in arrears. Advisor will not collect a fee in any quarter where the rate of return is zero or negative. Return is defined as appreciation in the value of the portfolio over the previous quarter's close and is adjusted for any contributions or withdrawals to the account. Appreciation includes all dividends, interest or capital gains (realized and unrealized) over the billing quarter. The calculation of return does not include money deposited or withdrawn from the account. Performance based fee arrangements may create an incentive for us to recommend investments which may be riskier or more speculative than those which would be recommended under an asset based fee arrangement. Such fee arrangements also create an incentive to favor higher fee paying accounts over other accounts in the allocation of investment opportunities. We have procedures designed and implemented so that all clients are treated fairly and equally, and to prevent this conflict from influencing the allocation of investment opportunities among clients.

### **Item 7 – Types of Clients**

We provide investment advice to:

- Individuals
- High net worth individuals
- Pensions and profit sharing plans
- Charitable organizations
- Corporations or business entities
- Trusts
- Estates

Some clients may require and/or receive more services than others, not all clients will require/receive the same amount of time from us. We require a minimum investment level for our clients of \$1,000,000.00, although it is at our discretion to waive the minimum investment level and the minimum fee.



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

Our investment philosophy is based upon Modern Portfolio Theory (MPT). MPT states that assets should be selected on the basis of how they interact with one another, rather than how they perform in isolation. Capital markets are composed of many classes of securities, including stocks and bonds, both domestic and international. A group of securities with shared economic traits is commonly referred to as an asset class. There are several asset classes, all with average price movements, that are distinct from one another. According to MPT, investors can benefit by combining the different asset classes in a structured portfolio.

We typically incorporate 12-21 distinct asset classes when building portfolios. When determining which asset classes to use in our model portfolios, we incorporate correlation research conducted by Eugene Fama and Kenneth French dating back to the Great Depression. Our goal is to choose investments that offer good asset class diversification at a low price. We determine the amount to allocate to each asset class based upon each asset class' risk characteristics and the investment goal of the model portfolio. We invest in mutual funds and exchange traded funds chosen based upon their diversification characteristics, internal expenses and tax efficiency. We often choose institutional funds (investments available only through an investment advisor) and investments that fall in the lowest quartile of expenses for their category.

We may offer advice on a multitude of security types including:

- Equities
- Corporate debt
- Commercial paper
- Certificates of deposit
- Municipal securities
- Investment Company securities
- United States government securities
- Options contracts
- Futures contracts
- Partnerships and others (including limited partnerships and third party money managers)

We do not generally recommend all of these options, but may recommend some of the above to you depending on your unique situation and current market conditions.

We use fundamental data, cyclical data, research materials prepared by other corporate rating services, annual reports, prospectuses, filings with the SEC, company press releases, financial newspapers and magazines, academic journals and articles as well as historical return information as sources of information and methods of analysis.

The investment strategies we may use to implement investment advice given to you include: long term purchases, short term purchases, trading (securities sold within 30 days), short sales, margin

transactions and options writing. Some of these, including options writing and margin transactions, can result in increased risk to your portfolio.

We will use our best judgment and good faith effort in rendering services to you. We cannot warrant or guarantee any particular level of account performances, or that an account will be profitable over time. Not every investment decision or recommendation made by us will be profitable. Except as may otherwise be provided by law, we will not be liable to you for:

- Any loss that you may suffer by reason of any investment decision made or other action taken or omitted in good faith by us with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use;
- Any loss arising from our adherence to your instructions;
- Any act or failure to act by a custodian of your account;
- The insolvency of the custodian; and
- Any acts of the agents or employees of the custodian whether any amount of such loss is covered by the Securities Investor Protection Corporation (SIPC) or any other insurance which may be carried by the custodian.

You should understand that the SIPC provides only limited protection for the loss of property held by the custodian.

Nothing in the Investment Advisory Agreement or in this disclosure shall relieve us from any responsibility or liability under state or federal statutes. Investing in securities involves risk of loss that you should be prepared to bear.

You assume all market risk involved in the investment of account assets and understand that investment decisions made for the account are subject to various markets, currency, economic, political and business risks. Other risks involved in our investment strategy include the following:

- Equities: market risk, small premium risk, value premium risk, foreign currency risk, country risk, emerging markets risk, real estate risk, tracking error risk, liquidity risk
- Commodities: issuer risk, commodities risk, futures risk, liquidity risk
- Fixed Income: interest rate risk, reinvestment risk, corporate risk, municipal credit risk, inflation risk, tracking error risk, liquidity risk
- Options hedging: options risk, liquidity risk

You should be aware that all investing involves the risk that investments may decline or be lost. No investments are guaranteed. All investments contain risk, and volatility should be expected. Over a long period of time, it is reasonable to expect higher returns from stocks than from bonds. Our strategy relies on the belief that this pattern should hold true in the future because investors demand a higher return from stocks due to the increased risk stocks present over bonds.

We attempt to manage risk in several ways:

- By designing our portfolios for the long-term investment horizon
- By mixing stocks with bonds in order to lower volatility
- By investing in multiple asset classes that are not correlated to each other (asset classes that do not move up and down in tandem)
- By investing in highly diversified mutual funds and ETFs that provide access to a large number of investments within each asset class
- By investing in short-term bonds when interest rates are low and longer term bonds when interest rates are higher
- By investing in inflation protection bonds and highly rated corporate and government bonds
- By minimizing investment cost including taxes and internal fund expenses

However, our strategy does not alleviate all investment risk and depending on your allocation, your portfolio may not contain all of these risk management components. Stock investments generally have a higher level of loss than bonds. Some of the stock asset classes we invest in have higher than average volatility (example: small cap and growth stocks) and some may experience extreme volatility (example: emerging markets stocks). Bond investments generally have a risk of not outperforming inflation and are affected by changing interest rates. Lower rated bonds have higher risk of default by issuers. U.S. investments have the risk that the dollar may not outperform other international currencies. International investments have the risk that their currencies may not outperform the dollar. Emerging market stocks often contain the risk of unstable governing countries. You should understand that the higher the expected return of a portfolio, the higher the risk of volatility and loss.

Targeted Premium Equity Portfolios are designed to offer varying levels of exposure to investment asset classes such as emerging markets, global exposure to small companies and global exposure to value companies. At times, these segments of the global investment market may be more volatile and may present additional risks as related to a passively weighted global index portfolio.

Targeted Credit Portfolios are designed to offer varying levels of exposure to credit risks associated with investing in bonds that may include high yield or emerging markets debt. These bond asset classes will be more volatile than treasuries or a total bond market index.

We do not recommend a particular type of security. Instead, we recommend a diversified portfolio of stocks, bonds and other investment vehicles. We select investments within the context of achieving adequate levels of diversification rather than any single specific security type.

#### **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. We have no information applicable to this Item.

#### **Item 10 – Other Financial Industry Activities and Affiliations**

We have a partner, Jack Monteith, who also operates a separate CPA business, Jack D. Monteith, CPA. Some clients of ours may also be clients of the CPA firm. Jack spends less than 5% of his time on the CPA business. Jack will occasionally be unavailable or less available to you because of this venture.

We have a new company called Pyramid San Juan Islands, PLLC. This new business is owned 50% by Empirical Financial Services, LLC and 50% by Pyramid Financial + Tax. This new firm owns Cathleen T Cavanagh CPA PS which will be managed by Pyramid Financial + Tax and not by Empirical Financial Services, LLC.

We have an employee, Elliott Appel, who is licensed to sell insurance in Washington State and appointed with various insurance companies. Highland Capital Brokerage is our insurance company broker. You are never obligated or required to purchase insurance products through Elliott in his separate capacity as an insurance producer; however acting in his separate capacity, he can help you find insurance products and Empirical Insurance will receive separate compensation (i.e. insurance commissions) from the insurance companies for selling you these products. You do not pay this fee directly to Empirical Insurance but it is part of the fees you pay to the insurance company for your insurance policy. Elliott spends less than 5% of his time offering insurance products.

We started a new registered investment advisor, Directional Financial Services, LLC, a wholly owned subsidiary of Empirical Financial Services, LLC. Directional was started to serve those who do not meet the minimum asset level of Empirical.

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

We have adopted a Code of Ethics for all access persons (any director, officer, general partner, employee or intern) of the firm describing our high standard of business conduct, and fiduciary duty to you. The Code of Ethics includes provisions relating to the confidentiality of your information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All access persons must acknowledge the terms of the Code of Ethics annually, or as amended. You may request a copy of our Code of Ethics by contacting your Adviser or our Chief Compliance Officer at [compliance@empirical.net](mailto:compliance@empirical.net).

We must refrain from rendering any advice or service concerning securities of companies in which any of our related access persons may have a substantial economic interest, unless we either determine in good faith that we may appropriately do so without disclosing such conflict to you or disclose such conflict to you prior to rendering such advice or services with respect to the account.

Our employees may trade securities for their personal accounts identical to or different than those recommended to you. It is our expressed policy that no person employed by us will prefer his or

her own interest over yours or make personal investment decisions based upon your investment decisions. Employee personal accounts may trade in the same securities with client accounts on an aggregated basis when consistent with our obligation of best execution. In such circumstances, the employee personal accounts and client accounts will share commission costs equally and receive securities at a total average price. We will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

Our Code of Ethics prohibits the use of material non-public information and requires all access persons to act with the fundamental principles of openness, integrity, honesty, diligence, respect, trust, competence, dignity and in an ethical manner when dealing with the public, clients, prospects, employers, and fellow employees. We will act as a fiduciary that owes each of our client's duties of care and loyalty with respect to all services undertaken on your behalf. We will use reasonable care and exercise independent judgment when conducting investment analysis, making investment recommendations, taking investment actions and engaging in other professional activities. We will maintain knowledge of and comply with all applicable laws, rules and regulations and not knowingly participate or assist in any violations of such. Employees will report any known issues of the Code of Ethics to the Compliance department immediately. Any individual not in observance of the above may be subject to termination.

The Code of Ethics is designed so that the personal securities transactions, activities and interests of our employees will not interfere with (a) making decisions in your best interest and (b) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code of Ethics, certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with your best interests. In addition, the Code of Ethics requires pre-clearance of many transactions, and in some cases restricts trading in close proximity to trading activity in your account. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as you, there is a possibility that employees might benefit from market activity in your account in a security held by an employee. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between us and you.

It is our policy that we will not affect any principal or agency cross transactions for your accounts. Principal transactions are generally defined as transactions where an advisor, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to you. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction in which the investment advisor, or any person controlled by or under common control with the investment advisor, acts as broker for both you and for another person on the other side of the transaction. Agency cross transactions may arise where an advisor is dually registered as a broker-dealer or has

an affiliated broker-dealer. We will also not cross trade between client's accounts. This means we will not sell securities from one client's account to another client.

Nothing in the Code of Ethics or this disclosure limits or restricts us or any of our directors, officers, affiliates or employees from buying, selling, or trading in any securities or other assets for its own account.

### **Item 12 – Brokerage Practices**

Except to the extent you direct otherwise, we will use our discretion in recommending the broker-dealer and therefore the commission charged. In selecting or recommending the broker-dealer, we will comply with the Securities Exchange Act of 1934 and with our fiduciary duty to obtain best execution. We will take into account such relevant factors as:

- Price
- The broker-dealers facilities, reliability, and financial responsibility
- The ability of the broker-dealer to effect transactions, particularly with regards to such aspects as timing, order size and execution of order
- The research and related brokerage services provided by such broker-dealer to us, notwithstanding that the account may not be direct or exclusive beneficiary of such services
- Any other factors we consider to be relevant

We do not maintain custody of your assets that we manage although we are deemed to have custody of your assets due to our ability to directly debit your advisory fees. (Please see Item 15 – Custody) Your assets must be maintained in an account at a “qualified custodian”, generally a broker-dealer or bank. We can help you establish a brokerage account with a qualified custodian. It is your decision where to custody your assets. You will open your account with the custodian by entering into an account agreement directly with them. We do not open the account for you, although we may assist in doing so.

### **How We Select Brokers-Dealers/Custodians**

We seek to use a broker-dealer/custodian who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including among others:

- Combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- Capability to execute, clear and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, etc.)
- Breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions

- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength and stability of the provider
- Their prior service to us and our clients
- Availability of other products and services that benefit us

### **Our Current Broker-Dealer Relationships**

We currently work with Schwab Adviser Services, a division of Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer, member SIPC, as a qualified custodian. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them. We are independently owned and operated and not affiliated with Schwab.

We participate in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. (TD Ameritrade) member FINRA/SIPC/NFA, and a qualified custodian. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers independent investment Advisors, services which include custody of securities, trade execution, clearance, and settlement of transactions.

Additionally, we use TIAA-CREF, which is comprised of two organizations – Teachers Insurance and Annuity Associate of America, a life insurance company, and the College Retirement Equities Fund, an open-ended diversified management investment company registered with the SEC. A TIAA-CREF account is available only via a 1035 exchange or rollover of a pre-existing annuity (not for purchase). Through TIAA-CREF's Advisor Services, clients are able to purchase low cost variable annuities that we are then able to connect to, manage and potentially bill. We do not pay any fees to TIAA-CREF for this service and do not receive referrals from TIAA-CREF. You are responsible for any fees associated with the fund and administration fees, which are paid to TIAA-CREF. TIAA-CREF's Advisor Services provide us with online access, data downloads, fee deduction capabilities, expanded eligibility to proprietary retirement products and access to an Insurance specialist to work one-on-one with us and our clients. Additionally, we have the ability to view accumulations, see history, process transactions and create annuity and minimum distribution illustrations. The availability to us of the above services will depend on the level of authorization granted by you.

### **Products and Services Available to Us from Mutual Fund Companies**

In some instances, some mutual fund companies including, but not limited to, iShares and Dimensional Fund Advisers, make available products and services that may benefit us, but may not directly benefit your account. These include software and other technology that provide research, pricing information and other market data, and assist with back-office functions. Some fund companies may discount or waive fees they would otherwise charge for some of these services or pay all/or a part of the fees of a third party providing these services to us. These products and services are not contingent upon committing to fund companies any specific amount of business.

As a fiduciary, we endeavor to act in your best interest. However, the aforementioned benefit may create a potential conflict of interest.

### **Products and Services Available to Us from Schwab**

Schwab Adviser Services (formerly called Schwab Institutional) is Schwab's business serving independent investment firms like us. They provide us and you with access to their institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer your accounts while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us as long as we keep a total of at least \$10 million of our clients' assets in accounts at Schwab. Below is a more detailed description of Schwab's support services:

Services that Benefit You: Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions and custody of your assets. The investment products available through Schwab include some of which we might not otherwise have access or that would require a significantly higher minimum initial investment by you. Schwab's services described in this paragraph generally benefit you and your account.

Services that May Not Directly Benefit You: Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering your accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to your account data (such as trade confirmations and account statements);
- facilitate trade execution and allocate aggregate trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from your accounts; and
- assist with back office functions, record keeping and client reporting.

Services that Generally Benefit Only Us: Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events;
- technology, compliance, legal and business consulting;
- access to employee benefit providers, human capital consultants, and insurance providers;
- publications and conferences on practice management and business succession; and
- access to an online compliance program to monitor employee personal trades, gifts and entertainment.



Schwab may provide some of these services itself. In other cases, it will arrange for third party vendors to provide the services to us. Schwab may discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

### **Our Interest in Schwab Services**

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services so long as we keep a total of at least \$10 million of client assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The \$10 million minimum may give us an incentive to request that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in your best interest. It is primarily supported by the scope, quality and price of Schwab's services (based on factors discussed below – see "How We Select Brokers-Dealers/Custodians") and not Schwab services that benefit only us. We have over \$900 million in client assets under management at Schwab, and do not believe that maintaining at least \$10 million of those assets at Schwab in order to avoid paying Schwab quarterly services fees presents a material conflict of interest.

### **Products and Services Available to Us from TD Ameritrade**

We participate in the TD Ameritrade's Institutional customer program and we may recommend TD Ameritrade to you for custody and brokerage services. There is no direct link between our participation in the program and the investment advice that we give to you, although we receive economic benefits through our participation in the program that are typically not available to TD Ameritrade retail investors.

Services that Benefit You: TD Ameritrade's brokerage services include access to a broad range of investment products, execution of securities transactions and custody of your assets. The investment products available through TD Ameritrade include some to which we might not otherwise have access including certain mutual funds with no transaction fees and certain institutional money managers that are not available to retail investors. TD Ameritrade's services described in this paragraph generally benefit you and your account.

Service that May Not Directly Benefit You: TD Ameritrade also makes available to us other products and services (provided without cost or at a discount) that benefit us but may not directly benefit you. These products and services assist us in managing and administering your accounts. They include investment research, both TD Ameritrade's own or that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not

maintained at TD Ameritrade. In addition to investment research, TD Ameritrade also makes available software and other technology that:

- provide access to your account data (receipt of duplicate statements and trade confirmations);
- access to a trading desk serving Advisor participants;
- access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to your accounts);
- the ability to have advisory fees deducted directly from your accounts; and
- access to an electronic communications network for order entry and account information.

Services that Generally Benefit Only Us: TD Ameritrade also offers other services to help us manage and further develop our business enterprise. These products or services include:

- business consulting and professional services;
- compliance;
- marketing;
- technology; and
- practice management.

Some of the products and services made available by TD Ameritrade through the program may benefit us but may not benefit your accounts. These products and services may assist us in managing and administering your accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits received by us or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of our fiduciary duty to you, we endeavor at all times to put the interests of you first. You should be aware, however, that the receipt of economic benefits by us or our related persons in and of itself creates a potential conflict of interest and may indirectly influence our choice of TD Ameritrade for custody and brokerage services.

### **Brokerage for Schwab Client Referrals**

We pay Schwab a participation fee on all referred clients' accounts that are maintained in custody at Schwab and non-Schwab custody fee on all accounts that are maintained at, or transferred to, another custodian. The participation fee paid by us is a percentage of the value of the assets in the client's account. We pay Schwab Participation Fees for so long as the referred client's accounts remain in custody at Schwab. Participation fees are billed quarterly and may be increased, decreased or waived by Schwab from time to time. Participation Fees are paid by us and not you. We do not charge anyone referred through the Service, fees or costs greater than the fee or costs we charge anyone else with similar portfolios that were not referred through the Service.

We generally pay 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. This fee does not apply if the client was solely responsible for the decision not to maintain custody at Schwab. The non-Schwab custody fee is a one-time payment equal to the percentage of the assets placed with a custodian other than Schwab. The non-Schwab custody fee is higher than the participation fees we generally would pay in a single year. Thus, we will have an incentive to recommend that your accounts be held in custody at Schwab.

The participation and non-Schwab custody fees are based on the amount of assets in your accounts which were referred by Schwab and those referred family members living in the same household. Thus, we will have incentives to encourage your household members referred through the Service to maintain custody of their accounts and execute transactions at Schwab and to instruct Schwab to debit our fees directly from their accounts.

For accounts maintained in custody at Schwab, Schwab generally does not charge you separately for custody, but will receive compensation from you in the form of commissions or other transaction-related compensation on securities trades. Schwab also will receive a fee (generally lower than the applicable commission on trades it executes) 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-dealers' fees. Thus, we may have an incentive to cause trades to be executed through Schwab rather than another broker-dealer. Nevertheless, we acknowledge our duty to seek best execution of trades for your accounts. Trades for your accounts held in custody at Schwab may be executed through a different broker-dealer than trades for our other clients. Thus, trades for accounts held in custody at Schwab may be executed at different times and different prices than trades for other accounts that are executed at other broker-dealers.

We may have an incentive to select or recommend a broker-dealer based on our interest in receiving client referrals, rather than on our clients' interest in receiving most favorable execution.

Some individuals associated with referral sources may also be clients of ours. They may receive a discounted fee schedule, which may cause a conflict of interest. They will not be treated more favorable than other clients.

### **Directed Brokerage**

By directing brokerage services, we may be unable to achieve most favorable execution of your transactions, and this practice may cost you more money.

Schwab and TD Ameritrade provide us with access to their institutional trading and custody services, which are not typically available to retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them. Their services are not contingent upon us committing any specific amount of business (assets in custody or trading commissions). Brokerage services include the execution of securities transactions, custody,

research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For our clients' accounts maintained in its custody, Schwab and TD Ameritrade generally do not charge separately for custody services but are compensated by charging you commissions or other fees on trades that are executed through Schwab/TD Ameritrade or that settle into your Schwab/TD Ameritrade accounts. In addition to these commissions, the custodian charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab/TD Ameritrade account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have your custodian execute most trades in your account.

In the event you direct us to use a particular broker-dealer, we may not be authorized under those circumstances to negotiate commissions and may not be able to obtain volume discounts or best execution. In addition, under these circumstances a disparity in commission charges may exist between the commission charged to clients who direct us to use a particular broker-dealer and the other clients who do not direct us to use a particular broker-dealer. Also, we may trade discretionary accounts before non-discretionary accounts which may have an impact on trading. We may trade directed brokerage after non-directed brokerage accounts which could make the trades more or less favorable to certain clients. Directing brokerage may cost you more money. For example, in a directed brokerage account, you may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or you may receive less favorable prices.

### **Aggregation of Orders**

We may aggregate orders when performing the same trade across many accounts, which typically occur only when making a broad change to the investment strategy. We rarely have the opportunity to aggregate trade orders as most trading is done at the individual level, considering your specific needs. When transactions are aggregated, the actual prices applicable to the aggregated transaction will be averaged, and your account will be deemed to have purchased or sold its proportionate share of the securities or instruments involved at the average price so obtained. Stock exchange regulations may in certain instances prevent the executing broker-dealer from delivering to your account a confirmation slip with respect to your participation in the aggregated transaction.

### **Trade Errors**

Trade Errors are our responsibility and are considered to be the erroneous purchase or sale of a position in your account. If we make a trade error in your account, it will be our responsibility to cover all resulting losses. For instance, if we meant to purchase fund A but erroneously purchased fund B and fund B then went down in total value, we must sell fund B, and purchase fund A in your

account and it would be our responsibility to make up any difference between the original purchase price of fund B and the proceeds from the sale of fund B.

### **Item 13 – Review of Accounts**

Your accounts are reviewed at least quarterly on an internal basis and as special situations arise, such as strategy changes by the Investment Committee, material flow of funds, or your directed allocation changes. Account reviews may include, but are not limited to:

- Review cash needs
- Analysis of account allocation targets
- Review of tax goals and realized gain/loss for the year
- Retirement projections and distribution strategies
- The performance of each account in relation to appropriate benchmarks
- Any other financial questions you may have

All taxable accounts are reviewed for tax purposes. Account reviewers include both portfolio managers and portfolio administrators.

We use portfolio software that allows us to enter specific trading restrictions for each account. The software analyzes accounts daily to determine if the accounts are in line with their restrictions. If there is any item that needs to be addressed, the trader will be alerted. The restrictions include:

- Amount of cash to keep available
- Asset allocation parameters
- Taxable status and tax restrictions
- Gains restrictions
- Legacy stock restrictions

Review meetings may take place in person, using web-based services, or over the phone. While these meetings are important whenever your circumstances or needs change, we encourage you to make time for review meetings even if you believe there is no compelling reason.

A written quarterly report is sent to all clients. This report includes a portfolio appraisal, which contains a description of all securities and the amount held in each of your accounts, a description of the management fees for the quarter and a letter updating you on our current investment strategies and thoughts for the future. Frequency and content of other reports will generally vary.

Generally, portfolio review meetings are offered to you on a quarterly basis, unless you request a differing review frequency, and include a report which reviews the following:

- Account objectives
- Details of investment holdings
- Performance
- Investment allocation details

During the portfolio review meetings, a verbal discussion may include:

- Current needs
- Upcoming lifestyle and financial changes
- Financial status
- Review of beneficiaries
- Review of current investment allocation and time horizon
- Contribution and withdrawals, existing and needed
- Portfolio performance

Periodically, we may deliver personal financial information and other communications, notices and required disclosure to clients through electronic means, such as email or secure website. This delivery may include notifications of availability of such document(s) on a website which will constitute 'delivery'. We ask clients with email addresses to keep this information current at all times by promptly notifying us of any change.

#### **Item 14 – Client Referrals and Other Compensation**

We receive an economic benefit from Schwab/TD Ameritrade in the form of support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at Schwab/TD Ameritrade. These products and services, how they benefit us and the related conflicts of interest are described above (Please see Item 12 – Brokerage Practices). The availability to us of Schwab/TD Ameritrade's products and services is not based on us giving particular investment advice, such as buying particular securities for you.

We receive client referrals from Charles Schwab & Co., Inc. through the participation in Schwab Adviser Network. The Service is designed to help investors find an independent investment adviser. Schwab is a broker-dealer independent of, and unaffiliated with us. Schwab does not supervise us and has no responsibility for our management of your portfolios or our other advice or services. We pay Schwab fees to receive client referrals through the Service. Our participation in the Service may raise potential conflicts of interest (See item 12 –Brokerage for Schwab Client Referrals).

We also receive client referrals from SigFig Wealth Management, LLC. This service is designed to help investors find an independent investment advisor. SigFig is independent of, and unaffiliated with us. SigFig does not supervise us and has no responsibility for our management of client's portfolios or our other advice or services. While SigFig endeavors to act in its' client's best interest, their recommendation of our services may be based in part on the benefit to SigFig of a portion of the ongoing management fee and not solely on the nature, cost or quality of our services, which may create a conflict of interest.

We pay SigFig a fee on any household introduced by SigFig that becomes a client of ours during the term of the agreement with SigFig, and within two years after termination of the agreement. The fee paid by us is 20% of any management fees received by us from the referred client for as long as the referred client's accounts are with us. Fees are paid by us to SigFig within 30 days after we

receive SigFig's invoice. Fees are paid by us and not the client. We do not charge clients, referred through SigFig, fees or costs greater than the fee or costs we charge clients with similar portfolios who were not referred through SigFig.

We also pay a fee to Wiseradviser.com to receive referrals, which are based on the geographical location of the prospective client. The fee paid is based on the number of referrals that are made each month, which may fluctuate from month-to-month. When looking for an advisor, the prospective client would go to the Wiser Advisor site, fill out a short form identifying the advisory services they are looking for, the size of their portfolio and their contact information. Wiser Advisor will then send the prospective client a list of 4 advisors in their geographical area that meet their criteria. We do not charge clients, referred through Wiser Advisor, fees or costs greater than the fee or costs we charge clients with similar portfolios who were not referred through Wiser Advisor.

#### **Item 15 – Custody**

Under government regulations, we are deemed to have custody of your assets if you authorize us to instruct your custodian to deduct our advisory fees directly from your accounts. Schwab, TD Ameritrade or TIAA-Cref maintains actual custody of your assets. You will receive at least quarterly statements from the qualified custodian that holds and maintains your accounts. They will be sent to the email or postal address you provided to your custodian. You should carefully review those statements promptly when you receive them. We urge you to compare official custodian account statements to the quarterly account statements that we you will receive from us. Our statements may vary slightly from custodian statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

#### **Item 16 – Investment Discretion**

We usually receive ongoing and continuous discretionary authority from you at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold and the broker-dealer used for the purchase or sale. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for your particular account.

We observe the investment policies, limitations and restrictions for your accounts when selecting securities and determining amounts. Investment guidelines and restrictions must be provided to us in writing. For registered investment companies, our authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

In some cases, you may instruct us not to trade certain positions without prior authorization or to trade only under certain market or price conditions. In these cases, we will deem these funds to be "legacy" and only to be traded under the restrictions placed by you. We prefer that "legacy" positions or in some cases entire "legacy" accounts be separated from the managed assets and be considered unmanaged. However, in certain circumstances, tax or financial planning needs or

preferences of you may require that we keep these positions co-mingled with managed assets, in which case we will be held to the investment guidelines and restrictions given to us.

We do not have investment discretion on linked outside accounts. We will offer advice and recommendations on the outside accounts but it will be your sole responsibility to implement allocation recommendations in these outside accounts linked to us for viewing purposes. These accounts will be deemed as “Non-Managed” and non-discretionary.

In some cases, your account may trade in the same securities with other client accounts on an aggregated basis when consistent with our obligation of best execution. In such circumstances, all accounts will share commission costs equally and receive securities at a total average price. We will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

#### **Item 17 – Voting *Client* Securities**

As a matter of policy and practice, we do not have any authority to and do not vote proxies on your behalf. Our investment models do not include securities that have proxy voting responsibilities. If you have securities in your portfolio outside our investment model, you retain the responsibility for receiving and voting those proxies. We may provide advice to you regarding voting of proxies.

#### **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you, and have not been the subject of a bankruptcy proceeding.



## Empirical Financial Services, LLC d/b/a Empirical Wealth Management

### Item 1- Cover Page

Kenneth Smith

### Chief Executive Officer

Empirical Financial Services, LLC

1420 5<sup>th</sup> Avenue – Suite 3150

Seattle, WA 98101

206.923.3474

January 27, 2014

*This Brochure Supplement provides information about Kenneth Smith that supplements the Empirical Financial Services Brochure. Please contact the Chief Compliance Officer if you did not receive Empirical Financial Services' Brochure or if you have any questions about the contents of this supplement. Additional information about Kenneth Smith is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

### Item 2- Educational Background and Business Experience

Kenneth R. Smith, CFP®, MS

Year of birth: 1972

Formal education after high school:

Master of Science in Financial Analysis – College for Financial Planning

CFP – College for Financial Planning

Bachelor of Arts and Sciences in Finance and Accounting - University of Arizona

Business Background:

2010 to present: Chief Executive Officer/ Co-Founder/ Principal – Empirical Financial Services, LLC

2006 – 2010: Chief Executive Officer/Managing Partner – Empirical Wealth Management, LLC

2001 – 2006: Regional Vice President – Chinook Capital Management, LLC

Professional designations held: CFP®

*For an explanation of the minimum qualifications for these designations, see pages 34-39.*

### Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

### Item 4- Other Business Activities

Kenneth Smith is involved in one real estate limited liability company. It is not registered with the SEC and is not considered a private fund. Clients of Empirical Wealth Management are not invested in this company nor are they allowed to invest in this company. Ken spends less than 5% of his time on this business.

### Item 5- Additional Compensation

Kenneth Smith is an owner of EFS and receives dividend payments for his ownership interest. Therefore, Ken indirectly receives compensation from all sources of company revenue.

### Item 6 - Supervision

Kenneth Smith is supervised by Jaime White, COO, who can be reached at (206) 923-3474. Ken provides financial advice directly to a handful of clients. Indirectly, Kenneth gives financial advice to clients by selecting the investments for clients' portfolios. His investment advice and investment decisions are based upon investment decisions, procedures and protocols agreed upon by our investment committee and upon his experience as an Adviser. The compliance department monitors his activities, and uses checks and balances to ensure decisions that are made follow the policies and procedures of the company and investment committee to the extent possible for client accounts.

#### **Item 1- Cover Page**

Jack Monteith

**Senior Financial Advisor/ Co-Founder**

Empirical Financial Services, LLC

9755 SW Barnes Rd – Suite 210

Portland, OR 97225

503.808.9005

January 27, 2014

*This Brochure Supplement provides information about Jack Monteith that supplements the Empirical Financial Services Brochure. Please contact the Chief Compliance Officer if you did not receive Empirical Financial Services' Brochure or if you have any questions about the contents of this supplement. Additional information about Jack Monteith is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

#### **Item 2- Educational Background and Business Experience**

Jack Monteith, CFP®, CPA®

Year of birth: 1951

Formal education after high school:

CFP, CPA – College for Financial Planning

Bachelors of Science in Business Administration - Portland State University

Business Background

2013 to present: Senior Financial Advisor/ Co-Founder/ Principal – Empirical Financial Services, LLC

2006 – 2013: President, Managing Partner – Empirical Wealth Management, LLC

1999 – 2006: Managing Partner – Chinook Capital Management, LLC

Professional designations held: CFP®, CFA®

*For an explanation of the minimum qualifications for these designations, see pages 34-39.*

#### **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

#### **Item 4- Other Business Activities**

Jack Monteith is involved in one real estate limited liability company. It is not registered with the SEC and is not considered a private fund. Clients of Empirical Wealth Management are not invested in this company nor are they allowed to invest in this company. Jack spends less than 5% of his time on this business. Jack Monteith also operates a separate CPA business, Jack D. Monteith, CPA. Some clients of Empirical Wealth Management may also be clients of the CPA firm. Jack spends less than 5% of his time on the CPA business.

#### **Item 5- Additional Compensation**

Jack Monteith is an owner of EFS and receives dividend payments for his ownership interest. Therefore, Jack indirectly receives compensation from all sources of company revenue.

Jack owns a CPA firm, Jack D. Monteith, CPA, from which he receives 100% of the profit for the tax preparation and tax consulting services he provides through that firm

#### **Item 6 - Supervision**

Jack Monteith is supervised by Kenneth Smith, CEO, who can be reached at (206) 923-3474. His investment advice and investment decisions are based upon investment decisions, procedures and protocols agreed upon by our investment committee and upon his experience as an Adviser and CPA. The compliance department monitors his activities, and uses checks and balances to ensure decisions that are made follow the policies and procedures of the company and investment committee to the extent possible for client accounts.

**Item 1- Cover Page**

Ethan Broga

**Financial Advisor/Principal**

Empirical Financial Services, LLC

1420 5<sup>th</sup> Ave - Suite 3150

Seattle, WA 98101

206.923.3474

January 27, 2014

*This Brochure Supplement provides information about Ethan Broga that supplements the Empirical Financial Services Brochure. Please contact the Chief Compliance Officer if you did not receive Empirical Financial Services' Brochure or if you have any questions about the contents of this supplement.*

*Additional information about Ethan Broga is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

**Item 2- Educational Background and Business Experience**

Ethan Broga, CFP®, MS

Year of birth: 1972

Formal education after high school:

Master of Science in Personal Financial Planning – College for Financial Planning

CFP – College for Financial Planning

Bachelors of Arts in Finance – Washington State University

Business Background

2010 to present: Financial Advisor/Principal – Empirical Financial Services, LLC

2006 – 2010: Regional Vice President – Empirical Wealth Management, LLC

2001 – 2006: Portfolio Manager – Chinook Capital Management, LLC

Professional designations held: CFP®

*For an explanation of the minimum qualifications for these designations, see pages 34-39.*

**Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

**Item 4- Other Business Activities**

Supervised person, Ethan Broga, is not actively engaged in any other investment-related business or occupation.

**Item 5- Additional Compensation**

Ethan Broga is an owner of EFS and receives dividend payments for his ownership interest. Therefore, Ethan indirectly receives compensation from all sources of company revenue.

Additionally, from time-to-time Ethan may receive a bonus that is based, in whole or in part, on assets from new accounts.

**Item 6 - Supervision**

Ethan Broga is supervised by Kenneth Smith, CEO, who can be reached at (206) 923-3474. His investment advice and investment decisions are based upon investment decisions, procedures and protocols agreed upon by our investment committee and upon his experience as an Adviser. The compliance department monitors his activities, and uses checks and balances to ensure decisions that are made follow the policies and procedures of the company and investment committee to the extent possible for client accounts.

**Item 1- Cover Page**

Lorne Enquist

**Financial Advisor/Principal**

Empirical Financial Services, LLC

1420 5<sup>th</sup> Avenue – Suite 3150

Seattle, WA 98101

206.923.3474

January 27, 2014

*This Brochure Supplement provides information about Lorne Enquist that supplements the Empirical Financial Services Brochure. Please contact the Chief Compliance Officer if you did not receive Empirical Financial Services' Brochure or if you have any questions about the contents of this supplement.*

*Additional information about Lorne Enquist is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

**Item 2 – Educational Background and Business Experience**

Lorne Enquist, CPA/PFS, MPAcc

Year of birth: 1973

Formal education after high school:

Master of Professional Accounting, Taxation - University of Washington

CPA/PFS – America Institute of CPAs

Bachelor of Arts in Business Administration, Accounting – University of Washington

Business Background

2013 to present: Financial Advisor/ Principal – Empirical Financial Services, LLC

2011 – 2013: Financial Advisor – Empirical Financial Services, LLC

2009 – 2011: Independent Financial Advisor – Berthel Fisher & Co.

2006 – 2009: Financial Advisor – AG Edwards/Wachovia/Wells Fargo Advisors

2005 – 2006: Tax Manager – King & Oliason, LLP

Professional designations held: CPA/PFS, MPAcc

*For an explanation of the minimum qualifications for these designations, see pages 34-39.*

**Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

**Item 4- Other Business Activities**

Supervised person, Lorne Enquist, is not actively engaged in any other investment-related business or occupation.

**Item 5- Additional Compensation**

Lorne Enquist is an owner of EFS and receives dividend payments for his ownership interest. Therefore, Lorne indirectly receives compensation from all sources of company revenue. Additionally, from time-to-time Lorne may receive a bonus that is based, in whole or in part, on assets from new accounts.

**Item 6 - Supervision**

Lorne Enquist is supervised by Kenneth Smith, CEO, who can be reached at (206) 923-3474. His investment advice and investment decisions are based upon investment decisions, procedures and protocols agreed upon by our investment committee and upon his experience as an Adviser and CPA/PFS. The compliance department monitors his activities, and uses checks and balances to ensure decisions that are made follow the policies and procedures of the company and investment committee to the extent possible for client accounts.

## Empirical Financial Services, LLC d/b/a Empirical Wealth Management

### Item 1- Cover Page

Shan Zubair

#### Financial Advisor

Empirical Financial Services, LLC

1420 5<sup>th</sup> Avenue – Suite 3150

Seattle, WA 98101

206.923.3474

January 27, 2014

*This Brochure Supplement provides information about Shan Zubair that supplements the Empirical Financial Services Brochure. Please contact the Chief Compliance Officer if you did not receive Empirical Financial Services' Brochure or if you have any questions about the contents of this supplement.*

*Additional information about Shan Zubair is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

### Item 2 – Educational Background and Business Experience

Shan Zubair, CFP®

Year of birth: 1984

Formal education after high school:

CFP – College for Financial Planning

Bachelor of Arts in Business Administration, Finance – Seattle University

Business Background

2010 to present: Financial Advisor – Empirical Financial Services, LLC

2007 – 2010: Associate Advisor – Empirical Wealth Management, LLC

Professional designations held: CFP®

*For an explanation of the minimum qualifications for these designations, see pages 34-39.*

### Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

### Item 4- Other Business Activities

Supervised person, Shan Zubair, is not actively engaged in any other investment-related business or occupation.

### Item 5- Additional Compensation

From time-to-time Shan may receive a bonus that is based, in whole or in part, on assets from new accounts.

### Item 6 - Supervision

Shan Zubair is supervised by Kenneth Smith, CEO, who can be reached at (206) 923-3474. His investment advice and investment decisions are based upon investment decisions, procedures and protocols agreed upon by our investment committee and upon his experience as an Adviser and CFP. The compliance department monitors his activities, and uses checks and balances to ensure decisions that are made follow the policies and procedures of the company and investment committee to the extent possible for client accounts.

**Item 1- Cover Page**

Elliott Appel

**Associate Financial Advisor**

Empirical Financial Services, LLC

1420 5<sup>th</sup> Avenue – Suite 3150

Seattle, WA 98101

206.923.3474

January 27, 2014

This Brochure Supplement provides information about Elliott Appel that supplements the Empirical Financial Services Brochure. Please contact the Chief Compliance Officer if you did not receive Empirical Financial Services' Brochure or if you have any questions about the contents of this supplement.

Additional information about Elliott Appel is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2 – Educational Background and Business Experience**

Elliott Appel

Year of birth: 1991

Formal education after high school:

Bachelor of Arts in Business Administration and Finance – Seattle University

Business Background

2012 to present: Associate Financial Advisor – Empirical Financial Services, LLC

Professional designations held: Candidate for CFP® Certification

*For an explanation of the minimum qualifications for these designations, see pages 34-39.*

**Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

**Item 4- Other Business Activities**

Supervised person, Elliott Appel, is not actively engaged in any other investment-related business or occupation.

**Item 5- Additional Compensation**

From time-to-time Elliott may receive a bonus that is based, in whole or in part, on assets from new accounts.

**Item 6 - Supervision**

Elliott Appel is supervised by Kenneth Smith, CEO, who can be reached at (206) 923-3474. His investment advice and investment decisions are based upon investment decisions, procedures and protocols agreed upon by our investment committee. The compliance department monitors his activities, and uses checks and balances to ensure decisions that are made follow the policies and procedures of the company and investment committee to the extent possible for client accounts.

## Empirical Financial Services, LLC d/b/a Empirical Wealth Management

### Item 1- Cover Page

Joseph Gallagher

**Financial Advisor**

Empirical Financial Services, LLC

1135 Broadway - Suite 101

Tacoma, WA 98402

253.348.2362

August 20, 2014

*This Brochure Supplement provides information about Joseph Gallagher that supplements the Empirical Financial Services Brochure. Please contact the Chief Compliance Officer if you did not receive Empirical Financial Services' Brochure or if you have any questions about the contents of this supplement.*

*Additional information about Joseph Gallagher is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

### Item 2- Educational Background and Business Experience

Joseph Gallagher, AAMS®

Year of birth: 1950

Formal education after high school:

Bachelors of Arts – Evergreen State University

Business Background

2014 to present: Financial Advisor– Empirical Financial Services, LLC

2014 – 2014: Senior Financial Advisor – Union Bank

2005 – 2013: Vice President/Financial Advisor – Charles Schwab, Inc.

2003 – 2005: Financial Consultant -- Merrill Lynch

Professional designations held: AAMS®

*For an explanation of the minimum qualifications for these designations, see pages 34-39.*

### Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

### Item 4- Other Business Activities

Supervised person, Joseph Gallagher, is not actively engaged in any other investment-related business or occupation.

### Item 5- Additional Compensation

From time-to-time Joseph may receive a bonus that is based, in whole or in part, on assets from new accounts.

### Item 6 - Supervision

Joseph Gallagher is supervised by Kenneth Smith, CEO, who can be reached at (206) 923-3474. His investment advice and investment decisions are based upon investment decisions, procedures and protocols agreed upon by our investment committee and upon his experience as an Adviser. The compliance department monitors his activities, and uses checks and balances to ensure decisions that are made follow the policies and procedures of the company and investment committee to the extent possible for client accounts.

## Empirical Financial Services, LLC d/b/a Empirical Wealth Management

### Item 1- Cover Page

Kenneth Lathon

#### Financial Advisor

Empirical Financial Services, LLC  
1400 Executive Parkway – Suite 245  
Eugene, OR 97401  
541.338.3000  
January 27, 2014

*This Brochure Supplement provides information about Kenneth Lathon that supplements the Empirical Financial Services Brochure. Please contact the Chief Compliance Officer if you did not receive Empirical Financial Services' Brochure or if you have any questions about the contents of this supplement.*

*Additional information about Kenneth Lathon is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

### Item 2 – Educational Background and Business Experience

Kenneth Lathon

Year of birth: 1950

Formal education after high school:

AWMA – College for Financial Planning  
Bachelor of Arts in Business Administration - San Jose University

Business Background

2013 to present: Financial Advisor – Empirical Financial Services, LLC  
2006 – 2013: Financial Advisor – Empirical Wealth Management, LLC  
2003 - 2006: Financial Advisor – Chinook Capital Management, LLC

Professional designations held: AWMA®

*For an explanation of the minimum qualifications for these designations, see pages 34-39.*

### Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

### Item 4- Other Business Activities

Supervised person, Kenneth Lathon, is not actively engaged in any other investment-related business or occupation.

### Item 5- Additional Compensation

From time-to-time Ken may receive a bonus that is based, in whole or in part, on assets from new accounts.

### Item 6 - Supervision

Kenneth Lathon is supervised by Jack Monteith, Senior Financial Advisor, who can be reached at (503) 808-9005. His investment advice and investment decisions are based upon investment decisions, procedures and protocols agreed upon by our investment committee and upon his experience as an Adviser. The compliance department monitors his activities, and uses checks and balances to ensure decisions that are made follow the policies and procedures of the company and investment committee to the extent possible for client accounts.



**Item 1- Cover Page**

Jeannie Matza Pedersen  
Financial Advisor

Empirical Financial Services, LLC  
9755 SW Barnes Rd – Suite 210  
Portland, OR 97225  
503.808.9005  
January 27, 2014

*This Brochure Supplement provides information about Jeannie Pedersen that supplements the Empirical Financial Services Brochure. Please contact the Chief Compliance Officer if you did not receive Empirical Financial Services' Brochure or if you have any questions about the contents of this supplement.*

*Additional information about Jeannie Pedersen is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

**Item 2 – Educational Background and Business Experience**

Jeannie Pedersen  
Year of birth: 1974

Formal education after high school:

Bachelor of Arts in Financial Economics; minor in History – University of San Francisco

Business Background

2013 to present: Financial Advisor – Empirical Financial Services, LLC  
2012 – 2013: Portfolio Administrator – Empirical Wealth Management, LLC  
2005 – 2012: Senior Portfolio Manager – Maxim Global Wealth Advisors

Professional designations held: Enrolled in CFP® Program

*For an explanation of the minimum qualifications for these designations, see pages 34-39.*

**Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

**Item 4- Other Business Activities**

Supervised person, Jeannie Pedersen, is not actively engaged in any other investment-related business or occupation.

**Item 5- Additional Compensation**

From time-to-time Jeannie may receive a bonus that is based, in whole or in part, on assets from new accounts.

**Item 6 - Supervision**

Jeannie Pedersen is supervised by Jack Monteith, Senior Financial Advisor, who can be reached at (503) 808-9005. Her investment advice and investment decisions are based upon investment decisions, procedures and protocols agreed upon by our investment committee and upon her experience as an Adviser. The compliance department monitors her activities, and uses checks and balances to ensure decisions that are made follow the policies and procedures of the company and investment committee to the extent possible for client accounts.

#### **Item 1- Cover Page**

Jason Sulkosky

#### **Financial Advisor**

Empirical Financial Services, LLC  
2555 E Camelback Road, Suite 140B  
Phoenix, AZ 85016  
480.207.2786  
June 9, 2014

*This Brochure Supplement provides information about Jason Sulkosky that supplements the Empirical Financial Services Brochure. Please contact the Chief Compliance Officer if you did not receive Empirical Financial Services' Brochure or if you have any questions about the contents of this supplement.*

*Additional information about Jason Sulkosky is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

#### **Item 2 – Educational Background and Business Experience**

Jason Sulkosky

Year of birth: 1975

Formal education after high school:

Bachelor of Arts in Business Administration; focus in Finance – University of Washington

Business Background

2014 to present: Financial Advisor – Directional Financial Services, LLC

2014 to present: Financial Advisor – Empirical Financial Services, LLC

2013 – 2013: Student – College of Financial Planning

2003 – 2013: VP Financial Consultant – Charles Schwab and Co

Professional designations held: Enrolled in CFP® Program

*For an explanation of the minimum qualifications for these designations, see pages 34-39.*

#### **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

#### **Item 4- Other Business Activities**

Supervised person, Jason Sulkosky, is employed by Empirical Financial Services as a full-time employee. However, Jason works primarily with Directional Financial Services which is a wholly owned subsidiary of Empirical Financial Services.

#### **Item 5- Additional Compensation**

From time-to-time Jason may receive a bonus that is based, in whole or in part, on assets from new accounts.

#### **Item 6 - Supervision**

Jason Sulkosky is supervised by Kenneth Smith, CEO, who can be reached at (206) 923-3474. His investment advice and investment decisions are based upon investment decisions, procedures and protocols agreed upon by our investment committee and upon his experience as an Adviser. The compliance department monitors his activities, and uses checks and balances to ensure decisions that are made follow the policies and procedures of the company and investment committee to the extent possible for client accounts.

#### **Item 1- Cover Page**

Erik Lehr

#### **Director of Research**

Empirical Financial Services, LLC

1420 Fifth Ave – Suite 3150

Seattle, WA 98101

206.923.3474

January 27, 2014

*This Brochure Supplement provides information about Erik Lehr that supplements the Empirical Financial Services Brochure. Please contact the Chief Compliance Officer if you did not receive Empirical Financial Services' Brochure or if you have any questions about the contents of this supplement.*

*Additional information about Erik Lehr is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

#### **Item 2 – Educational Background and Business Experience**

Erik Lehr, CAIA®

Year of birth: 1984

Formal education after high school:

Masters of Science in Computational Finance and Risk Management – University of Washington

Masters of Arts in Economics – University of Oregon

Bachelor of Arts in Economics and Mathematics – University of Oregon

Business Background

2012 to present: Director of Research – Empirical Financial Services, LLC

2012 – 2012: Research Analyst – Empirical Financial Services, LLC

2011 – 2012: Research Assistant – University of Washington

Professional designations held: CAIA®

*For an explanation of the minimum qualifications for these designations, see pages 34-39.*

#### **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

#### **Item 4- Other Business Activities**

Supervised person, Erik Lehr, is not actively engaged in any other investment-related business or occupation.

#### **Item 5- Additional Compensation**

From time-to-time Erik may receive a bonus that is based, in whole or in part, on assets from new accounts.

#### **Item 6 - Supervision**

Erik Lehr is supervised by Kenneth Smith, CEO, who can be reached at (206) 923-3474. His investment advice and investment decisions are based upon investment decisions, procedures and protocols agreed upon by our investment committee. The compliance department monitors his activities, and uses checks and balances to ensure decisions that are made follow the policies and procedures of the company and investment committee.

## Professional Designation Qualifications

### Certified Public Accountant (CPA)

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majorities of state boards of accountancy have adopted the AICPA's *Code of Professional Conduct* within their state accountancy laws or have created their own.

### Personal Financial Specialist (PFS)

The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's *Code of Professional Conduct*, and is encouraged to follow AICPA's *Statement on Responsibilities in Financial Planning Practice*. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years. The PFS credential is administered through the AICPA.

*From AICPA, March 2012*

### CERTIFIED FINANCIAL PLANNER™ (CFP®)

The Certified Financial Planner™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct

and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

*Rev 12/16/10 by the Certified Financial Planner Board of Standards, Inc.*

### **CHARTERED FINANCIAL ANALYST® (CFA charter)**

The Chartered Financial Analyst®, CFA charter is a professional certification mark granted in the United States by the CFA Institute.

The CFA® charter is a voluntary certification; no federal or state law or regulation requires financial analysts to hold CFA® certification. CFA Program candidates report dedicating in excess of 300 hours of study per level. Completing the entire Program is a significant challenge that takes most candidates between two and five years.

To attain the right to use the CFA® mark, an individual must satisfactorily fulfill the following requirements:

- **Education** – Have a Bachelor’s (or equivalent) Degree from a regionally accredited United States college or university (or its equivalent from a foreign university) or be in the final year of your bachelor’s degree program at the time of registration or have four years of professional work experience or have a combination of professional work and college experience that totals at least four years and the four year total must be accrued prior to enrollment;
- **Examination** – Pass each of the three level 6 hour examinations. The Level I exam asks you basic knowledge and comprehension questions focused on investment tools; some questions will require analysis. The Level II exam further emphasizes analysis along with applying your knowledge. The Level III exam focuses on synthesizing all of the concepts and analytical methods in a variety of applications for effective portfolio management and wealth planning;
- **Experience** – Complete at least four years of qualified work experience at least 50% of your time should be spent directly involved in the investment decision-making process or producing a work product that informs or adds value to that process. Work must be full time and can be earned before, during, or after participation in the CFA Program; and
- **Ethics** – Pledge to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFA® professionals.

*Rev 01/27/14 by the CFA Institute.*

### **ACCREDITED WEALTH MANAGEMENT ADVISOR (AWMA®)**

Financial Advisors holding the Accredited Wealth Management Advisor <sup>sm</sup> designation have taken coursework to gain advanced, yet practical knowledge about these critical aspects of the financial services industry: asset management, allocation, and selection; investment performance and strategies; and taxation of investment products. The course also includes training in investment for retirement, strategies for small business owners, and the management of deferred compensation plans. In addition, instruction will cover insurance, estate planning, asset protection, and tax reduction issues.

The College for Financial Planning® awards the ACCREDITED WEALTH MANAGEMENT ADVISOR SM AND AWMA® designation to students who:

- \*successfully complete the program;
- \*pass the final examination; and
- \*comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment of the designation is contingent upon the College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed.

Students must sign and return the Code of Ethics forms within six months of passing the final exam. Failure to complete and submit the forms within this time frame may result in termination of the individual's candidacy. If an individual wishes to apply for authorization to use the Marks in the future, he or she may be required to fulfill the initial designation requirements in place at the time of passing the exam.

Successful students receive a certificate and are granted the right to use the designation on correspondence and business cards for a two-year period.

Continued use of the AWMA® designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the AWMA® designation by:

- \*completing 16 hours of continuing education;
- \*reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and self-disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct; and
- \*paying a biennial renewal fee of \$95.

*From College for Financial Planning, December 2012*

### **ACCREDITED ASSET MANAGEMENT SPECIALIST (AAMS®)**

Financial Advisors holding the Accredited Asset Management Specialist<sup>sm</sup> designation have completed a course of study encompassing investments, insurance, tax, retirement, and estate planning issues. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.

The College for Financial Planning® awards the Accredited Asset Management Specialist<sup>sm</sup> and AAMS® designation to students who:

- \*successfully complete the program;

- \*pass the final examination; and

- \*comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions.

- \*disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment and retention of the designation is contingent upon the College for Financial Planning's review of matters either self-disclosed or discovered by the College that are required to be disclosed.

Students must sign and return the Code of Ethics forms within six months of passing the final exam. Failure to complete and submit the forms within this time frame may result in termination of the individual's candidacy. If an individual wishes to apply for authorization to use the Marks in the future, he or she may be required to fulfill the initial designation requirements in place at the time of passing the exam.

Successful students receive a certificate and are granted the right to use the designation on correspondence and business cards for a two-year period.

Continued use of the AAMS® designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the AAMS® designation by:

- \*completing 16 hours of continuing education;

- \*reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and self-disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct; and

- \*paying a biennial renewal fee of \$95.

*From College for Financial Planning, August 2014*

### **CHARTERED ALTERNATIVE INVESTMENT ANALYST (CAIA)**

The CAIA Charter is earned by (1) successfully completing the CAIA program (passing both Level I and Level II exams) and (2) becoming a member of the CAIA Association. To qualify for membership in the CAIA Association, which includes the right to use the CAIA designation, you must fulfill all of the following requirements:

- a) Pass both the CAIA Level I and Level II exams.

- b) Hold a bachelor's degree, or the equivalent, and have more than one year of professional



experience, or alternatively have at least four years of professional experience. Professional experience is defined as full-time employment in a professional capacity within the regulatory, banking, financial, or related fields.

c) Agree on an annual basis to abide by the Member Agreement.

d) Provide two (2) professional references.

e) Submit payment for the annual CAIA Association membership fee.

Membership is the final requirement for individuals who wish to use the CAIA designation.

*Rev. September 2013 by the CAIA Association.*