
**Part 2A of Form ADV:
Firm Brochure
March 2015**

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This Firm Brochure provides information about the qualifications and business practices of Dean, Jacobson Financial Services, LLC. If clients have any questions about the contents of this brochure, please contact Dean, Jacobson Financial Services, LLC at (817) 335-3214.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority.

Additional information about Dean, Jacobson Financial Services, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Please be aware, the use of the term 'Registered Investment Adviser' does not imply a certain level of skill or training.

Item 2 – Material Changes

Dean, Jacobson Financial Services, LLC's (hereinafter "DJFS", "the firm", or "Adviser") last annual amendment filing was dated 02/21/2014.

Since DJFS's last annual amendment filing, the firm has no material changes to disclose in its Brochure.

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Item 4 – Advisory Business

Dean, Jacobson Financial Services, LLC has been in business since 1967 and has been registered as a Registered Investment Adviser since 1997. The principal owners are Don A. Jacobson, Jeffrey J. Schmeltekopf and Timothy C. Lowry.

Asset Management

DJFS emphasizes continuous and regular account supervision. As part of its asset management service, Adviser generally uses one of seven model portfolios, which are further described in Item 8, consisting of mutual funds, exchange traded funds (“ETFs”), and other public and private securities or investments. Individual stocks and bonds may also be used. The client’s individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned securities. Each portfolio will be initially designed to meet a particular investment goal, which Adviser, through discussions with and inputs from the client, will determine to be suitable to the client’s circumstances. Once the appropriate portfolio has been determined, Adviser will review the portfolio at least annually and if necessary, rebalance the portfolio based upon the client’s individual needs, stated goals, and objectives. Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio.

LPL Financial Sponsored Advisory Programs

DJFS may provide advisory services through certain programs sponsored by LPL Financial, LLC (LPL), member FINRA/SIPC. Below is a brief description of each LPL advisory program available to the firm’s clients. For more information regarding LPL programs, including more information on the advisory services and fees that apply, the types of investments available in the programs and the potential conflicts of interest presented by the programs; please see LPL Financial’s Form ADV Part 2A Firm Brochure, Form ADV Part 2A Appendix A Wrap Fee Program Brochure, and the applicable client agreement.

Adviser will assist each client with determining the suitability of each program as well as setting an appropriate investment objective.

Optimum Market Portfolios Program (OMP)

OMP offers clients the ability to participate in a professionally managed asset allocation program using Optimum Funds Class I shares. Under OMP, clients will authorize LPL, on a discretionary basis, to purchase and sell Optimum Funds pursuant to the investment objectives chosen by the client. Adviser will have discretion to select a mutual fund asset allocation portfolio designed by LPL consistent with the client’s investment objective. LPL will have discretion to purchase and sell Optimum Funds pursuant to the portfolio selected for the client. LPL will also have authority to rebalance the account. A minimum account value of \$15,000 is required for OMP.

Personal Wealth Portfolios Program (PWP)

PWP offers clients an asset management account using asset allocation model portfolios designed by LPL. Adviser will have discretion for selecting the asset allocation model portfolio based on client’s investment objective. Adviser will also have discretion for selecting third party money managers (PWP Advisers) or mutual funds within each asset class of the model portfolio. LPL will

act as the overlay portfolio manager on all PWP accounts and will be authorized to purchase and sell on a discretionary basis mutual funds and equity and fixed income securities. A minimum account value of \$250,000 is required for PWP.

Model Wealth Portfolios Program (MWP)

MWP offers clients a professionally managed mutual fund asset allocation program. Adviser will have discretion to select a model portfolio designed by LPL's Research Department consistent with the client's stated investment objective. LPL's Research Department is responsible for selecting the mutual funds within a model portfolio and for making changes to the mutual funds selected.

The client will authorize LPL to act on a discretionary basis to purchase and sell mutual funds (including in certain circumstances exchange traded funds) and to liquidate previously purchased securities. The client will also authorize LPL to effect rebalancing for MWP accounts.

In the future, the MWP program may make available model portfolios designed by strategists other than LPL's Research Department. If such models are made available, Adviser will have discretion to choose among the available models designed by LPL and outside strategists. A minimum account value of \$50,000 is required for MWP.

DJFS receives compensation as a result of a client's participation in an LPL program. The compensation received depends on many factors including but not limited to, the size of the account, changes in its value over time, the ability to negotiate fees or commissions, and/or the number of transactions. The amount of this compensation may be more or less than what Adviser would receive if the client participated in other programs, whether through LPL or another sponsor, or paid separately for investment advice, brokerage and other services.

Ability of Clients to Impose Restrictions on Investing in Certain Securities or Types of Securities:

Clients have the opportunity to place reasonable restrictions on the types of investments to be held in their portfolio. However, restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account.

Participation in Wrap Fee Programs

DJFS offers wrap fee programs as further described in Part 2A, Appendix 1 (the "Wrap Fee Program Brochure"). DJFS's wrap fee and non-wrap fee accounts are managed on an individualized basis according to the client's investment objectives, financial goals, and risk tolerance, among other factors. Adviser does not manage wrap fee accounts in a different fashion than non-wrap fee accounts. As further described in the Wrap Fee Program Brochure, Adviser receives all or a portion of the wrap fee for its services.

Assets under Management

Adviser manages \$219,000,000 on a discretionary basis and \$0 on a non-discretionary basis as of December 31, 2014.

Financial Planning & Consulting Services

Adviser offers two levels of comprehensive financial planning programs, as well as various levels of modular planning.

Level A: Comprehensive financial plans are produced through Adviser's WealthVision system. This level is primarily for clients who have more complex estates, high net worth, invested assets of at least \$2 million, and a broad diversity of account and asset holdings. WealthVision allows Adviser to aggregate client holdings on the client's personal, encrypted website with automatic daily updates. It also provides numerous other features and conveniences available through 24/7 worldwide internet access.

Level B: Comprehensive financial plans are produced through a different proprietary planning system. While equally robust to WealthVision's projection calculations, this level of planning does not offer the aggregation of assets to a client's personal website with automatic daily updates. Instead, this information is updated into the plan on regular intervals to provide accurate projections and analyses. This level of planning, as with level A, incorporates comprehensive financial planning and wealth management in order to help clients achieve their goals. This level is for clients who have at least \$500,000 of invested assets and a net worth of at least \$1 million or who have high income and anticipate their wealth growing at a rapid pace due to aggressive accumulation and savings.

These services involve taking a proactive and personalized approach to create a consistent, cohesive strategy to address a client's goals, as well as consolidating and coordinating other important professionals and expertise needed in the planning process. These services are driven, beginning to end, by the needs and goals of a client. Strategies can be developed only after appropriate data has been gathered and evaluated. This information is discussed with the client in an attempt to present it in the proper context. Finally, implementation, continuous monitoring and necessary modifications are all important parts of the process.

Adviser recognizes that not all clients desire the full breadth of services that Adviser provides through its level A and B comprehensive financial plans and wealth management services. Thus, Adviser offers specific services that clients may request and need as modular plans. These may consist of insurance, investments, retirement, or other areas of planning advice.

Clients must set their goals and define the role Adviser will play. It is Adviser's responsibility to educate clients in the process and to assist them with defining, quantifying and prioritizing their goals.

Comprehensive financial planning and wealth management services may include, but are not limited to, the following areas:

Estate Planning

Estate Planning, in its simplest form, means planning for the disposition or distribution of assets upon death. A good estate plan has three goals:

1. To make sure the client's wealth reaches the individuals or organizations the client selects in the manner that they choose
2. To minimize the effect of federal or state taxes on the client's estate

3. To allow clients to select who will handle various functions on their behalf

Retirement Planning

Adviser will help the client make a realistic appraisal of their financial situation, make reasonable projections, balance their immediate financial needs with long-term plans, find opportunities to defer and minimize taxes, and match their needs and goals with appropriate financial products and investment strategies.

Tax Planning

Adviser takes into consideration the tax implications surrounding financial planning recommendations. Clients may engage Adviser to review their tax situation for planning ideas to reduce and defer taxes, provide an explanation of current changes in the tax law and review investments from a tax perspective.

Adviser believes that there are five fundamental strategies for tax reduction:

1. Timing income and expenses
2. Converting taxable income to non-taxable income
3. Deferring taxes to a subsequent year
4. Shifting taxable income to someone in a lower tax bracket
5. Deducting expenses

The process is adjusted as a client's goals and personal financial situation changes. Tax planning may require coordination with qualified accountants, as needed.

Business Evaluation and Succession Planning

Adviser, in conjunction with attorneys and accountants, can help a client structure a succession plan that is consistent with their financial goals and needs and can provide both short-term and long-term security regarding ownership control and their overall financial well-being. This generally includes developing a business-plan, analyzing the tax ramifications associated with various decisions, and making recommendations regarding Buy-Sell Agreements and alternatives for how they can be funded.

Charitable Gift Planning

Adviser's role in charitable gift planning is to help a client carefully design their estate plan to help facilitate clients' philanthropic ambitions while satisfying other important financial concerns. Charitable gift planning may also entail using various vehicles and techniques to minimize or avoid certain income, estate, and gift taxes. Charitable gift planning may also require coordination with qualified estate and charitable gift planning attorneys.

Risk Management & Asset Protection

Adviser helps a client to determine the possibilities and probabilities associated with a particular risk, assess the financial consequences should the risk occur, and effectively deal with the risks. This may include using transference, avoidance, reduction, and retention strategies.

Adviser analyzes a client's exposure to liability claims (such as medical malpractice or bankruptcy) or unnecessary and avoidable taxation. Adviser works with accountants, attorneys and insurance companies to develop appropriate strategies that may include but are not limited to, creating wills, trusts, forming appropriate corporate structures, choosing retirement vehicles and securing appropriate insurance coverage.

Financial Planning & Consulting Conflicts of Interest

There is a potential conflict of interest because there is an incentive for Adviser offering financial planning services to recommend products or services for which Adviser or an adviser representative may receive compensation. However, financial planning clients are under no obligation to act upon any recommendations of Adviser or to execute any transactions through Adviser or its adviser representative if they decide to follow the recommendations.

Item 5 – Fees and Compensation

Asset Management Maximum Fees

<u>Assets under Management</u>	<u>Annual Percentage of Assets Charge:</u>
\$25,000-\$299,999	2.50%
\$300,000-\$999,999	2.00%
\$1,000,000-\$2,999,999	1.75%
\$3,000,000-\$4,999,999	1.50%
\$5,000,000 and Up	Negotiated

DJFS' fees are billed in advance each quarter on a pro-rata annualized basis based on the value of client's account on the time-weighted daily average of the previous quarter. The ultimate fee that the client is charged is based on the scope and complexity of the engagement with the client and will be specifically outlined in a separate, signed agreement.

Fees will be automatically deducted from client's managed account by a qualified custodian. In rare cases, Adviser will agree to directly bill clients. As part of this process, clients understand and acknowledge the following:

- (a) The client's independent custodian sends statements at least quarterly showing all disbursements for the account, including the amount of the advisory fees paid to Adviser;
- (b) The client provides authorization permitting Adviser to be directly paid by these terms;
- (c) If Adviser sends a copy of an invoice to the client, Adviser will also send a copy of the invoice to the independent custodian;
- (d) If Adviser sends a copy of an invoice to clients, the invoice will include a legend that urges the client to compare information provided in their invoice with statements received from the qualified custodian.

LPL Financial Sponsored Advisory Program Maximum Fees

<u>LPL Financial Sponsored Advisory Program</u>	<u>Annual Percentage of Assets Charge:</u>
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Optimum Market Portfolios Program (OMP)	2.5%
Personal Wealth Portfolios Program (PWP)	2.5%
Model Wealth Portfolios Program (MWP)	2.5%

Fees for LPL Financial Sponsored Advisory Programs are billed in advance each quarter on a pro-rata annualized basis based on the value of client's account on the time-weighted daily average of the previous quarter. LPL serves as program sponsor and broker-dealer for the LPL Advisory programs. DJFS and LPL may share in the account fee and other fees associated with the program's accounts.

Other Types of Fees

Non-Wrap clients will incur transaction charges for trades executed in their accounts. These transaction fees are separate from Adviser's management fee. Also, clients will pay the following separately incurred expenses, which Adviser does not receive any part of: charges imposed directly by a mutual fund, index fund, or exchange traded fund; which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses).

Wrap fee clients will receive Form ADV, Part 2A, Appendix 1 (the "Wrap Fee Program Brochure"). Wrap fee clients will not incur transaction costs for trades. More information about this is disclosed in a separate Wrap Fee Program Brochure.

Termination of Asset Management Agreement

Advisor charges its management fees quarterly in advance. In the event that clients wish to terminate Adviser's services, Adviser will refund the unearned portion of Adviser's management fee to clients. Clients must contact Adviser in writing to terminate Adviser's services. Upon receipt of such letter of termination, Adviser will proceed to close out the client's accounts and process a pro-rata refund of unearned management fees.

Receipt of Additional Compensation

Supervised persons may receive brokerage or mutual fund trail commissions from the sale of securities in their capacity as registered representatives of LPL Financial, a registered broker-dealer, member of the Financial Industry Regulatory Authority, Inc. ("FINRA"), the Securities Investor Protection Corporation ("SIPC"), and a Registered Investment Adviser.

This practice may present a potential conflict of interest as it provides an incentive to recommend investment products based on the compensation to be received rather than on the client's needs. Adviser monitors trading practices and regularly reviews client securities transactions in order to protect clients against this conflict of interest. Clients are advised that they are not required to purchase or sell securities through the investment adviser representatives acting in the capacity of registered representatives of LPL Financial and may purchase the same securities or products from broker-dealers of their choice.

Financial Planning & Consulting Range of Fees

Level A: For Level A planning, clients are charged a fixed fee that ranges from \$1,500 to \$20,000 for initial setup. This is typically calculated based on various criteria such as net-worth, complexity of the estate, and the depth of work and personnel required for the initial set-up. A deposit of 50% of the initial financial planning fee is due upon signing a Client Agreement and the balance due upon completion of the contracted services. Adviser also provides retainer consulting services related to Level A planning and wealth management services. Adviser charges a fixed renewal fee that does not exceed \$2,500 on an annual basis.

Level B: For Level B planning, clients are charged a fixed fee that ranges from \$500 to \$5,000 for an initial setup and written financial plan. This is typically calculated based on various criteria such as net-worth, complexity of the estate, and the depth of work and personnel required for the initial set-up. A deposit of 50% of the initial financial planning fee is due upon signing a Client Agreement and the balance due upon final delivery of the written plan. Adviser also provides retainer consulting and wealth management services related to the financial plan that was created for a client. Adviser charges a fixed renewal fee that does not exceed \$1,500 on an annual basis.

Modular: Adviser may offer modular planning on a fixed fee basis or bill for such services on an hourly rate. Prior to engagement, Adviser will provide clients with the cost of the service to be provided and what, if any, deposit will be required. Modular services that are not set up on a fixed fee and for services that are not covered in the signed Client Agreement will be billed at an hourly rate that ranges from \$75 to \$350. Hourly fees are payable as services are performed. All fees are based on the level of expertise necessary to deliver the services and range of services being provided.

If clients elect to implement recommendations made during the planning or consulting process, their accounts may incur transaction costs, retirement plan administration fees, mutual fund annual expenses and other fees. These fees are in addition to and separate from other services offered through Adviser.

Termination of Financial Planning Agreement

A planning or consulting client will have a period of five (5) business days from the date of signing a Client Agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, the client may terminate the agreement by providing Adviser with written notice prior to delivery of the plan or completion of the service.

Upon receipt of letter of termination, Adviser will process a refund of unearned fees paid in advance by the Client, prorated based on work already done on the Client's behalf. If fees are payable after services are performed, there are no unearned fees. The client is not due a refund upon early termination of a contract. However, under these circumstances fees are prorated to the date of termination.

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

Adviser does not charge or receive, directly or indirectly, any performance-based fees.

Item 7 – Types of Clients

Adviser provides advisory services to:

- Individuals – An individual, their trusts, estates, 401(k) plans and IRAs, as well as those of their immediate family members count as one individual. Businesses organized as sole proprietorships are considered separate entities;
- High net worth individual – An individual who is a “qualified client” under rule 205-3 of the Advisers Act of 1940 or is a “qualified purchaser”;
- Pension and profit sharing plans (other than plan participants);
- Charitable Organizations;
- Corporations or other business types.

Account Minimums

For LPL’s Financial Sponsored Advisory Programs, there may be account minimums. Please see Item 4 of this Brochure.

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

Adviser’s goal is to achieve risk-adjusted returns in client portfolios consistent with the clients’ goals and resources. The specific risk/return characteristics of each client’s portfolio are tied to the selection of their strategic asset allocations.

Adviser believes that mutual funds represent the best method of investing for most investors. Adviser uses actively managed mutual funds, as well as index-linked ETFs (a passive investment strategy). Adviser may also incorporate individual securities (stocks and bonds), Business Development Companies (BDCs), Master Limited Partnerships (MLPs), Private Equity, and other unique investment offerings to clients who qualify.

Adviser generally uses seven model portfolios, each composed with actively managed mutual funds, index-linked exchange traded funds (ETFs), or a combination of both. These portfolios range from balanced/conservative to aggressive/growth with varying levels of tax efficiencies. Although ETFs and mutual funds may lose value, DJFS believes that their breadth of diversification enhances the chance of long-term success in both up and down markets.

Funds

Adviser analyzes various factors, including fund management experience, performance consistency, expenses, and manager discipline. Adviser focuses on identifying mutual fund managers that have provided consistently strong performance year after year relative to a meaningful peer group and benchmark.

Adviser looks for managers who have a clear philosophy and consistently implement it through a disciplined process in the belief that those managers are more likely to be able to replicate their results. When Adviser’s opinion changes on a mutual fund, it is usually because of a fundamental change in the fund or its management, not simply due to a shift in short-term performance.

A short period of under-performance relative to peers or a benchmark doesn't always indicate that the fund manager has lost their touch. It may in fact, simply demonstrate that the fund manager remains true to the fund's style regardless of short-term changes in the market.

However, DJFS does watch for several types of events in conjunction with poor performance. These events trigger an in-depth review of a fund and primarily include:

- Change in fund management company ownership;
- A new portfolio manager;
- Significant change in asset allocation;
- Substantial drift in investment style; and/or
- Sustained under-performance.

Strategic Asset Allocation

Adviser believes strongly in strategic asset allocation. Asset allocation is the process of constructing a diversified portfolio from a wide range of different asset classes. An asset class is a broad group of similar securities such as corporate bonds, large company stocks, or foreign company stocks as opposed to a single stock or bond. Examples of other asset classes would include high-yield bonds, small company stocks, U.S. Treasury bills, and real estate.

Adviser believes that the most important type of asset allocation is strategic asset allocation. This involves setting a long-term investment policy, establishing weightings for various asset classes, as well as dynamic core holdings, and making few changes over the short run unless there is a specific change in the investor's objectives.

Adviser rejects attempts to predict short-term market swings, and then shift the portfolio into specific, concentrated asset classes at certain times to improve returns. Although no investment policy can guarantee success, strategic asset allocation may help enhance portfolio returns by reducing volatility.

Academic research has demonstrated that the performance of different asset classes is not always closely related; some rise in value at the same time others are declining. Asset allocation strategies take advantage of this lack of correlation to build portfolios that are unlikely to have assets that all do well or poorly at the same time. As a result, a well-diversified portfolio can weather various market conditions and potentially provide less volatility through investment cycles.

Risk of Loss

Clients are advised that investing in securities involves the risk of loss of the entire principal amount invested including any gains. Clients should not invest unless they are able to bear losses. Any of the above investment strategies may lead to a loss on investments. Even hedging strategies may fail if markets move against the hedged investments. In addition, because investing carries with it opportunity risk, it is impossible to accurately predict the sectors of the market or asset classes that will have more favorable returns for a given period.

Item 8.A – Frequent Trading of Securities

Adviser is not involved in the frequent trading of securities.

Item 8.B – Material Risks of Particular Securities

Adviser doesn't recommend a type of security that involves significant or unusual risks.

Item 9 – Disciplinary Information

Adviser does not have any disciplinary information to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

Item 10.A – Broker-Dealer Registration

Supervised persons are also registered representative of LPL Financial. In their capacities as registered representative, supervised persons may recommend securities or other products and receive normal transaction commissions or other compensation. Thus, a conflict of interest may exist between the interests of the supervised persons and those of the advisory clients. However, clients are under no obligation to act upon any recommendations of the supervised persons or effect any transactions through the supervised persons if clients decide to follow supervised person's recommendations.

Item 10.B – Futures Commission Merchant/Commodities

Neither Adviser nor any of its management persons is a commodity broker/futures commission merchant, a commodity pool operator, commodity trading advisor or an associated person for the foregoing entities or has an application for registration pending.

Item 10.C – Relationships with Related Persons

In addition to being registered representatives of LPL Financial, supervised persons are insurance agents appointed with various insurance companies. In these capacities, supervised persons of DJFS may recommend insurance products and receive commissions and other compensation if products are purchased. Thus, a potential conflict of interest exists between the interests of supervised persons and those of the advisory clients. However, clients are under no obligation to act upon any recommendations of the supervised persons or execute any transactions through the supervised persons if they decide to follow their recommendations.

Supervised persons of DJFS, in their separate capacity as tax preparers, offer tax preparation, bookkeeping, and accounting services to some advisory clients.

Supervised persons are owners and officers of Jade Plan Services Inc., a firm that provides pension services. These are potential conflicts of interests because there are incentives to recommend these services to advisory clients and supervised persons would receive direct or indirect compensation. Clients are under no obligation to use these services.

Item 10.D – Relationships with Other Advisers

Supervised persons of DJFS are also investment adviser representatives of LPL Financial. In such capacity, they may offer advisory services through LPL Financial, details of which are fully described in LPL Financial's Form ADV or relevant schedules. These are potential conflicts of interest to the extent that they may recommend that a client open an advisory account with LPL Financial in which they would receive compensation. Clients are under no obligation to use the services of another investment adviser.

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

Item 11.A – Code of Ethics

Adviser has adopted a *Code of Ethics* that sets forth standards of conduct expected of advisory personnel and to address conflicts that arise from personal trading by advisory personnel. Advisory personnel are obligated to adhere to the *Code of Ethics*, and applicable securities and other laws. Advisory personnel also adhere to the *Code of Ethics* associated with their applicable professional designations.

The *Code of Ethics* covers a range of topics that may include: general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, and amendments to Form ADV and supervisory procedures. Adviser will provide a copy of the *Code of Ethics* to any client or prospective client upon request.

Item 11.B – Participation or Interest in Client Transactions

Principal Trading

Adviser does not execute securities transactions as principal with Adviser's clients.

Personal Trading of Associates Affiliated with a Brokerage Firm

In their capacities as registered representative of LPL Financial, supervised persons of Adviser may receive payments from certain mutual funds distributed pursuant to a 12b-1 distribution plan or other such plans as compensation for administrative services, representing a separate financial interest. As such, a conflict of interest may exist with respect to recommendations to buy or sell securities. In all cases, transactions are effected in the best interests of the client. Adviser does not permit insider trading and has implemented procedures to ensure that its policy regarding insider trading is being observed by supervised persons.

Agency-Cross Action Transactions

Neither Adviser nor any supervised persons may recommend to clients, or transact buys or sells for client accounts, securities in which Adviser or a supervised person has a material financial interest. Neither Adviser nor any supervised person acting as a principal, buys securities from (or sells

securities to) clients; acts as general partner in a partnership in which Adviser solicits client investments; or acts as an investment adviser to an investment company that Adviser recommends to clients.

Item 11.C – Personal Trading

Adviser recommends that clients invest in open-end mutual funds, ETFs and other securities. Adviser and its supervised persons may invest in the same securities. Adviser and its supervised persons are permitted to invest in all asset classes. See Item 11.D for conflicts of interest.

Item 11.D – Conflicts of Interest with Personal Trading

Supervised persons may own an interest in or buy or sell for their own accounts the same securities, which may be recommended to advisory clients.

Adviser seeks to ensure that supervised persons do not personally benefit from the short-term market effects of their recommendations to clients and their personal transactions are regularly monitored. Supervised persons are aware of the rules regarding material non-public information and insider trading. Supervised persons may also buy or sell a specific security for their own account based on personal investment considerations, which Adviser does not deem appropriate to buy or sell for clients.

Item 12 – Brokerage Practices

Item 12.A – Factors in Selecting or Recommending Broker-Dealers

DJFS considers a wide range of factors when selecting or recommending broker-dealers to clients. Among these factors include: best execution, research, investment products, costs, and quality of services.

With this in consideration, Adviser recommends that clients establish brokerage accounts with LPL Financial. Clients are advised that they are under no obligation to implement Adviser's recommendation and may choose a broker-dealer at their discretion. Clients may pay commissions or fees that are higher or lower than those that may be obtained elsewhere for similar services.

Item 12.A1 – Research and Other Soft Dollar Benefits

Adviser does not receive soft dollars generated by the securities transactions of its clients. The term "soft dollars" refers to funds, which are generated by client trades "commission rebates or credits" being used by Adviser to purchase products or services (such as research and enhanced brokerage services) from or through broker-dealers whom Adviser engages to execute securities transactions.

Adviser, however, does receive some "eligible" products and services under Safe Harbor regulations as determined under the Securities and Exchange Act, Section 28(e). These products and services include: national, regional, or investment adviser specific educational events organized and/or sponsored by LPL Financial; professional compliance; legal and business consulting; publications and conferences on practice management; information technology; business succession; employee benefit providers; human capital consultants; investment management and due diligence;

insurance; and marketing. While, as a fiduciary, Adviser endeavors to act in its clients' best interests, Adviser's recommendation that clients maintain their assets in accounts at LPL Financial may be based in part on the benefit to Adviser of the availability of some of the foregoing products and services and other arrangements and not solely on the nature, cost, or quality of custody and brokerage services provided by LPL Financial, which may create a potential conflict of interest.

Item 12.A2 – Brokerage for Client Referrals

Adviser does not refer clients to particular broker-dealers in exchange for client referrals from those broker-dealers.

Item 12.A3 – Directed Brokerage

Adviser does not require that clients direct their brokerage business to any particular broker-dealer.

Item 12.B – Trade Aggregation

Adviser does not aggregate the purchase or sale of securities for various client accounts.

Item 13 – Review of Accounts

Adviser uses a dynamic and ongoing review process to continually reinforce and educate clients about its investment approaches, as well as to clarify the fundamental tenets and standards on which investment advice is based.

Investment adviser representatives perform reviews of all advisory accounts no less than annually. Accounts are reviewed for consistency with the investment strategy and performance among other things. Reviews may be triggered by changes in an account holder's personal, tax, or financial status. There is currently no limit on the number of accounts that can be reviewed by an investment adviser representative.

Advisory account statements are generated no less than quarterly. These statements are sent directly to the account owner from their broker dealer, product sponsors, custodian or retirement plan administrator. These reports list the account positions, activity in the account over the covered period, and other related information. Clients are also sent confirmations following each brokerage account transaction.

Item 14 – Client Referrals and Other Compensation

Suggestion of Brokers to Clients

Adviser recommends LPL Financial as a custodian and broker-dealer to advisory clients. Supervised persons of Adviser may also be dually registered as registered representatives of LPL Financial. As a result, Adviser is generally required to utilize the brokerage/custodial services of LPL for

investment advisory accounts. Adviser's general policies relative to the execution of client securities brokerage transactions are as follows:

Execution of Brokerage Transactions (when applicable)

If requested, Adviser will arrange for the execution of securities brokerage transactions for the account through broker-dealers that Adviser reasonably believe will provide "best execution." In seeking "best execution," the determinative factor is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution. Adviser also takes into consideration the full range of the broker-dealer's services including execution capability, commission rates, and responsiveness. Although Adviser will seek competitive commission rates, it may not necessarily obtain the lowest possible commission rates for account transactions.

Over-the-Counter (OTC) securities transactions for advisory clients are generally effected based on two (2) separate broker-dealers: (1) a "dealer" or "principal" acting as market-maker; and (2) the executing broker-dealer that acts in an agency capacity for the client's account. Dealers executing principal transactions typically include a mark-up/down, which is included in the offer or bid price of the securities purchased or sold. In addition to the dealer mark-up/down, the client may also incur the transaction fee imposed by the executing broker-dealer. Adviser does not receive any portion of the dealer mark-up/down or the executing broker-dealer transaction fee.

Transactions for each client account generally will be effected independently, unless Adviser decides to purchase or sell the same securities for several clients at approximately the same time. Adviser may, but is not obligated to, combine or "batch" such orders to obtain "best execution", to negotiate more favorable commission rates, to allocate fairly among the clients' differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. To the extent that Adviser determine to aggregate client orders for the purchase or sale of securities, including securities in which Adviser's principals (and/or supervised persons) may invest, Adviser shall generally do so in accordance with the parameters set forth in SEC No-Action Letter, *SMC Capital, Inc.* Adviser shall not receive any additional compensation or remuneration as a result of the aggregation.

When referring clients to dealers, Adviser will only refer clients to dealers registered in states where the clients reside.

Industry Associates

Industry associates include vendors, money managers, and sub-advisers that Adviser either uses or networks with in order to provide the best array of services and providers to clients. At times, these industry associates may offer to Adviser's adviser representatives certain non-monetary benefits. These benefits are not tied to the sales of any products to clients. Benefits may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings with Adviser's adviser representatives, client workshops or client appreciation events, marketing events or advertising initiatives. Industry associates may also pay for, or reimburse Adviser for the costs associated with, education or training events that may be attended by Adviser's employees.

Solicitors

Adviser does not have an arrangement under which it compensates others for client referrals.

Item 15 – Custody

Adviser doesn't accept custody of client funds or securities. Qualified custodians hold all client assets.

Item 16 – Investment Discretion

Clients have the option of providing Adviser with investment discretion on the client's behalf, pursuant to a signed Client Agreement. By granting investment discretion, Adviser is authorized to execute securities transactions, which securities are bought and sold, the total amount to be bought and sold, and the costs at which the transactions will be effected. Limitations may be imposed by the client in the form of specific constraints on any of these areas of discretion with written acknowledgement.

Item 17 – Voting Client Securities

Adviser does not accept authority to vote proxies on behalf of clients as a matter of policy. Clients will receive their proxy information directly from their custodian. Clients may contact Adviser with questions about a particular solicitation by telephone at 817-335-3214.

Item 18 – Financial Information

Adviser is not required to provide financial information to its clients because:

- Adviser does not require the prepayment of more than \$1,200 in fees when services cannot be rendered within 6 (six) months.
- Adviser does not take custody of client funds or securities.
- Adviser does not have a financial condition or commitment that impairs its ability to meet contractual and fiduciary obligations to clients.
- Adviser has never been the subject of a bankruptcy proceeding.

- End of Form ADV Part 2A -