

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page

Vasquez & Co., Inc.

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May 21, 2015

This Brochure provides information about the qualifications and business practices of Vasquez & Co., Inc. If you have any questions about the contents of this Brochure, please contact us at 415-745-3601 or dan@vsqz.co. 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.

Vasquez & Co., Inc. 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 Vasquez & Co., Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

On July 28, 2010, the United States Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules.

This Brochure dated May 21, 2015, is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

This Brochure dated May 21, 2015, although prepared according to the SEC’s new requirements and rules, reflects that Vasquez & Co. is switching from SEC registration to registration with the State of California, and that Vasquez & Co. is not succeeding to another registered investment adviser.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Daniel W. Vasquez, Founder at (415) 745-3601 or dan@vsqz.co. Our Brochure is also available on our web site www.vsqz.co, also free of charge.

Additional information about Vasquez & Co., Inc. is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with Vasquez & Co., Inc. who are registered, or are required to be registered, as investment adviser representatives of Vasquez & Co., Inc.

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Vasquez & Co., Inc. serves as an investment manager to clients that are high net-worth and individual investors from the multicultural economy. Vasquez & Co. has been in business since 2008. Vasquez & Co., Inc., a Corporation, is solely owned by Daniel Vasquez (100%) and has no subsidiaries.

Vasquez & Co. provides investment advice only and invests in opportunities across several industries, markets, national borders, and asset classes, including - but not limited to - equities (private and public), fixed income (corporates, municipals, and sovereigns), commodities and futures with a particular outlook in global emerging economies.

As fiduciaries Vasquez & Co. are long-term guardians of investor capital, and as we invest alongside our clients, we do not seek short-term profits. Rather, we build and nurture long-term wealth. We do not rent or trade stocks, we buy and own businesses that produce goods and services for the real economy. We invest in companies that make things that ordinary people need. We are bottom-up value investors, not top-down speculators or traders. We are investment stewards, not salespeople. We are not interested in quick riches: instead, long-term prosperity.

Through our investment selection and portfolio holdings, we demonstrate the appropriate temperament for preserving principal capital and generating consistent, steady income, and total returns. We anchor our investment philosophy and strategy in the time-tested ideas of John Maynard Keynes, Joseph Schumpeter, Benjamin Graham, Warren Buffet, Michael Porter, and among other thought leaders, who embrace a fundamental, value-oriented investment doctrine. The multicultural economy is defined as economies where cultural diversity, tolerance and openness contribute to economic growth and business performance.

Vasquez & Co., Inc. provides bespoke discretionary and non-discretionary investment advisory services to high net worth investors from the multicultural economy. Each client portfolio of securities and assets is uniquely constructed, customized to client risk-reward profile. Vasquez & Co. does not participate in any wrap fee programs.

Vasquez & Co., Inc. will provide investment management services exclusively on a fixed-fee basis, as a percentage of assets under management. To serve the variety of needs of its many investment management clients, Vasquez & Co., Inc. will utilize the compensation structure described in the next section. In all cases, fees for the investment services provided are paid quarterly in advance, and in arrears depending on the custodian.

The specific services and compensation arrangement appropriate to each client, as well as appropriate disclosures, are documented in the Investment Management Agreement ("IMA"), signed by the client prior to service being rendered.

As of May 21, 2015, Vasquez & Co. manages 100% of client assets on a discretionary basis, or \$5,000,000 in total assets under management.

For those clients making use of the investment management services provided by Vasquez & Co., Inc. the amount of the asset management fee is based upon the total assets under management and according to the following schedule:

- 2.5% of the first \$1,000,000 of total investment management to be supervised;
- 2.25% of the next \$4,000,000;
- 2.0% of the next \$5,000,000;
- Negotiable on all amounts above \$10,000,000.

Vasquez & Co. withdraws quarterly management fees directly from client accounts under the proviso of the following safeguards: 1) all clients are notified in advance that quarterly management fees will be charged; 2) request to withdraw fees per account is sent directly to the custodian; 3) custodian verifies available cash balances per client account; 4) custodian assures fees are not excessive given reported fee structure; 5) custodian then credits applicant's sundry master account, whilst simultaneously debits client accounts; and 5) all debits for management fees are disclosed, labeled, and reported in the client monthly account statement in which management fee was charged. Complete transparency is of the highest priority. There is no minimum annual fee, custodian fee, or mutual fund fees.

Fees may be negotiable where special circumstances exist. In no case are fees collected more than six months in advance. To comply with Section 260.238 (j) of the California Code of Regulation, Vasquez & Co., Inc. discloses that lower fees for comparable services may be available from other sources.

Prospective clients receive a complimentary initial consultation, during which the client and Vasquez & Co., Inc. discuss the client's goals and suitability of an ongoing advisory relationship.

If, for any reason, a client wishes to terminate an IMA in the first five business days after entering the agreement, the client will be entitled to a full refund of any fees paid to Vasquez & Co., Inc. under that agreement. Thereafter, Vasquez & Co., Inc. or the client may terminate the agreement at any time. The client will be liable for the advisory fee -- prorated based on the fee schedule -- earned up to the date a notice of termination is received from the client. Any difference between the prorated figure and the advisory will be refunded to the client. To ensure clear communication, a termination notice must be verbal or issued in writing. In case a client fails to pay the fees, Vasquez & Co., Inc. has the right to terminate the IMA on the quarter.

Any custodian-initiated charges (brokerage fees, commissions, etc.) that may be assessed by the custodial companies are paid directly by the clients of Vasquez & Co., Inc. Assets and securities are generally held in a custodial account at Trade PMR (First Clearing Corporation), or a similar custodial company.

Vasquez & Co. does not accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Vasquez & Co., Inc. does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Vasquez & Co., Inc. primarily provides specialized discretionary and non-discretionary investment advisory services to high net-worth, ultra high net-worth investors, and individuals from the multicultural economy.

Minimum account thresholds and balances for clients:

- Ultra high net-worth (non-institutional): \$5,000,000
- High net-worth (non-institutional): \$1,000,000
- Institutional: \$10,000,000

The minimum investment required by an individual investor client is generally \$1,000,000. Accounts below this minimum may be negotiable and accepted on an individual basis at Vasquez & Co.'s discretion. However, Vasquez & Co. may from time to time establish, modify and waive account or investment minimums for different investment products and/or services.

Investing in securities involves risk of loss that clients should be prepared to bear. Vasquez & Co., Inc. endeavors to mitigate this risk by deploying the following method of analysis, investment strategy, while attempting to minimize the risk of loss. Vasquez & Co., Inc. bottom-up, value-based investment strategy is guided by the following principles:

1. Vasquez & Co., Inc. focuses on the estimated intrinsic value of a company, as represented by its projected future earnings, rather than attempt to divine markets trends. Vasquez & Co., Inc. seeks inequalities in price and value.
2. Vasquez & Co., Inc. ensures that a sufficiently large margin of safety exists – the difference between a company's assessed intrinsic value per share and its current market price per share. Vasquez & Co., Inc. digs deep into company financials; evaluates competitive strategy and industry position. Vasquez & Co., Inc. also evaluates industry structure: concentration, fragmentation, market share, opportunities for consolidation (e.g., Mergers & Acquisition, IPOs, etc).
3. Vasquez & Co., Inc. applies independent judgment in valuing company shares of stocks, which may often imply a contrarian investment policy.
4. Vasquez & Co., Inc. limits transaction costs and ignores the distractions of constant price quotation via mainstream media noise by maintaining a steadfast holding of company stocks. There is a difference between market noise and real, material, value-changing information. Vasquez & Co., Inc. does not churn portfolios – excessive buying and selling, or day trading, of securities. Vasquez & Co., Inc. only sells when it makes sense for the client. Vasquez & Co., Inc. endeavors to build long-term wealth, not short-term riches.
5. Vasquez & Co., Inc. practices a policy of portfolio concentration by committing relatively large sums of capital to market stunners. Vasquez & Co., Inc. reinvests all dividends. Vasquez & Co., Inc. buys 5 to 10, no more than 15, companies for the long-term interest of its clients. Vasquez & Co., Inc. identifies companies with attractive dividend yields, steady and consistent dividend payout policies, and little-to-no debt on their books.
6. Vasquez & Co., Inc. maintains an appropriate temperament by balancing equanimity and patience with the ability to act decisively. Vasquez & Co., Inc. keeps its head above the fray and always reevaluate portfolios and companies with a new set of eyes so as to maintain objectivity under changing company facts, delicate macroeconomic environment, evolving regulatory regimes, and volatile market conditions.
7. Vasquez & Co., Inc. stays abreast of world events, culture, philosophy, religion, the arts, and other heuristic constructs that may affect values.

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Vasquez & Co., Inc. or the integrity of Vasquez & Co., Inc. management. Vasquez & Co., Inc. has no information applicable to this Item.

However, Vasquez & Co. license was temporarily revoked for failure to renew license in 2014, resulting from failure to pay annual renewal fee and dues. This was but a slight oversight in Vasquez & Co.'s part, and has been since corrected.

Vasquez & Co., Inc. is not actively engaged in a business other than giving investment advice. Vasquez & Co., Inc. does not sell products or services other than investment advice to its clients. The principal business of Vasquez & Co., Inc. or its principal executive officers does not involve something other than providing investment advice.

Vasquez & Co. does not recommend or select other investment advisers, nor does Vasquez & Co. receive any compensation from other investment adviser that pose a material conflict of interest.

Vasquez & Co., Inc. is not registered – or has an application pending – as a securities broker-dealer. Vasquez & Co., Inc. is not registered – or has an application pending – as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Vasquez & Co., Inc. does not have any arrangements that are material to its investment business or its clients with a related person who is a: broker-dealer; investment company; other investment advisor; financial planning firm; commodity pool operator, commodity trading advisor or futures commission merchant; banking or thrift institution; accounting firm; law firm; insurance company or agency; pension consultant; real estate broker-dealer; or an entity that creates or packages limited partnerships.

Vasquez & Co., Inc. or a related person is not a general partner in any partnership in which clients are solicited to invest.

Vasquez & Co., Inc. or a related person does not have any arrangements, oral or in writing, where it: is paid in cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients; directly or indirectly compensates any person for client referrals.

Vasquez & Co., Inc. has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, 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 supervised persons at Vasquez & Co., Inc. must acknowledge the terms of the Code of Ethics annually, or as amended.

Vasquez & Co., Inc. anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Vasquez & Co., Inc. has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Vasquez & Co., Inc., its affiliates and/or clients, directly or indirectly, have a position of interest. In other words, Vasquez & Co. may very well invest alongside its clients in the very same securities it recommends to clients. Vasquez & Co. believes this practice only strengthens its alignment of long-term incentives and interests with its clients.

Vasquez & Co., Inc.'s employees and persons associated with Vasquez & Co., Inc. are required to follow Vasquez & Co., Inc.'s Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Vasquez & Co., Inc. and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Vasquez & Co., Inc.'s clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Vasquez & Co., Inc. will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Vasquez & Co., Inc.'s clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Vasquez & Co., Inc. and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Vasquez & Co., Inc.'s obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. Vasquez & Co., Inc. 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.

Vasquez & Co., Inc.'s clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Daniel W. Vasquez, Founder (415) 533-4244, dan@vsqz.co.

It is Vasquez & Co., Inc.'s policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Vasquez & Co., Inc. will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. 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 is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

In the interest and spirit of full disclosure, Vasquez & Co. license was temporarily revoked for failure to renew license in 2014, resulting from failure to pay annual renewal fee and dues. This was but a slight oversight in Vasquez & Co.'s part, and has been since corrected.

While Vasquez & Co., Inc. is not a registered representative with any NASD securities firm, Vasquez & Co., Inc. may have a relationship with one or more discount brokerage firms for custodial, or administrative, purposes. Vasquez & Co., Inc. selects brokerage custodians based on the availability of investment products, best execution, level of service, brokerage fees and/or commissions.

Although it is not required to consider any specific criteria, Vasquez & Co., Inc. generally seeks "best execution" of securities transactions in light of the circumstances existing at the time individual transactions are executed. In evaluating a custodial-broker-dealer's ability to provide best execution, Vasquez & Co., Inc. considers a range of factors, including net prices (after markups, markdowns or other transaction-related compensation) on other transactions; the execution, clearance and settlement and error correction capabilities generally and in connection with securities of the type and in the amounts to be bought or sold; the custodial-broker-dealer's willingness to commit capital; their reliability and financial stability; the size of the transaction; the availability of securities to borrow for short sales; the nature, quantity and quality of research provided by the broker-dealer; and the market for the security.

A custodial-broker-dealer relationship exists with Trade-PMR (First Clearing Corporation). There are no soft dollar benefits. Vasquez & Co., Inc. reserves the right to explore other broker-dealer relationships in the best interest of the client (e.g., minimizing transaction costs like custodial fees, commission rates, interest charges, etc.). There is no requirement that a client use a custodial-broker-dealer Vasquez & Co., Inc. suggests. The client may, in fact, request or recommend or require a custodial-broker-dealer of their choosing.

To comply with Section 260.238 (k) of the California Corporations Code, Vasquez & Co., Inc. will disclose to an investor client in writing before entering into or renewing an advisory agreement any material conflict of interest relating to Vasquez & Co., Inc., its representatives, or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice including: (1) compensation arrangements connected with investment advisory services to clients which are in addition to compensation from such clients for such services; and (2) charging an investor client an advisory fee without disclosing that a commission for executing securities transactions pursuant to such advice will be received by Vasquez & Co., Inc., its representatives or its employees, or that such advisory fee is being reduced by the amount of the commission earned by Vasquez & Co., Inc., its representatives or employees for the sale of securities to the investor client. Vasquez & Co., Inc., does not intend to receive commission-related income from custodial-broker-dealer relationships; nor is commission-related income part of the Vasquez & Co., Inc.'s business income model. Vasquez & Co. will generate income solely from a percentage of investor client assets under management.

All rules and regulations of the Investment Advisors Act of 1940 as well as the California Code of Corporations will be strictly adhered and enforced.

All clients of Vasquez & Co., Inc. are managed and reviewed on a continuous basis. Overall investment management, market prospects and individual issue prospects are considered in the review process. Client account holdings will be reviewed at any time changing market conditions warrant. Triggering factors that may affect an account review could be any material change in an investment in a client's account resulting from a change in a company's financial condition, industry and/or company outlook as well as general economic, political or other relevant market situations that may alter a client's tolerance for risk and account value. Clients receive annual or quarterly reviews of their investments and strategies. All account reviews are conducted by the Founder, Daniel W. Vasquez.

Clients receive standard account monthly or quarterly statements from TradePMR, and Vasquez & Co., Inc. Vasquez & Co., Inc. recommends that clients review financial goals and objectives and risk tolerance on an annual basis. The client has the right to renew, or terminate, the IMA each year. Other reports or reviews are issued to clients on “as contracted for” basis and may be oral or written depending on the nature and scope of the services desired by the client. Clients are provided with transaction confirmation notices and regular account summaries directly from the custodian and Vasquez & Co., Inc. for their accounts. At a minimum, clients will receive quarterly reports, summarizing the investment performance of their accounts. Annual investment performance reports will be comprehensive, assessing client portfolio performance relative to asset class benchmarks, investment style and strategy, industry averages, sector analyses and broader economic conditions.

Vasquez & Co., Inc. does not receive any economic benefit (any sales awards or other prizes) for providing investment advice or other advisory services to anyone who is not a client of Vasquez & Co., Inc.

Vasquez & Co., Inc. or a related person does not directly or indirectly compensate any person who is not a supervised person of Vasquez & Co., Inc. for client referrals.

Vasquez & Co., Inc. does not hold custody of client assets, funds or securities. TradePMR is the custodian of client assets, funds and securities. All trades are cleared through First Clearing Corporation.

Vasquez & Co. withdraws quarterly management fees directly from client accounts under the proviso of the following safeguards: 1) all clients are notified in advance that quarterly management fees will be charged; 2) request to withdraw fees per account is sent directly to the custodian; 3) custodian verifies available cash balances per client account; 4) custodian assures fees are not excessive given reported fee structure; 5) custodian then credits applicant's sundry master account, whilst simultaneously debits client accounts; and 5) all debits for management fees are disclosed, labeled, and reported in the client monthly account statement in which management fee was charged. As complete transparency is of the highest priority, Vasquez & Co. will send invoices to clients when management fees are due.

Clients should receive at least quarterly statements from TradePMR. Vasquez & Co., Inc. urges clients to carefully review such statements and compare such official custodial records to the account statements that Vasquez & Co., Inc. provides to you. Vasquez & Co., Inc. statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Vasquez & Co., Inc. usually receives discretionary authority from the client in the form of an executed limited power of attorney at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

Vasquez & Co., Inc. maintains limited power of attorney in substantially all client accounts. The limited power of attorney authorizes Vasquez & Co., Inc. to execute securities transactions on behalf of clients without prior approval. All transactions are executed in accordance with the Investment Policy Statement (“IPS”) and stated investment objectives, which have been previously discussed with the client.

While Vasquez & Co., Inc. maintains client discretion over which securities to be bought or sold and amount of securities to be bought or sold, Vasquez & Co., Inc. does not make independent investment decisions for its clients. Clients retain control and final decision-making powers in all cases. When portfolio rebalancing or minor transactions are needed, Vasquez & Co., Inc. will make such changes without approval from the client so long as the transactions are consistent with the IPS as previously approved by the client.

In all other situations, recommendations are made to the client and the client makes the decision to implement the recommendation, make adjustments, or decline. Clients are generally asked to affirm their agreement with recommendations by signing the IPS. When time is of the essence or when there is difficulty in completing a written authorization, verbal approvals from the client are accepted. Vasquez & Co., Inc. will keep written record of such circumstances as they arise.

For registered investment companies, Vasquez & Co., Inc.’s 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. Investment guidelines and restrictions must be provided to Vasquez & Co., Inc. in writing.

When selecting securities and determining amounts, Vasquez & Co., Inc. observes the investment policies, limitations and restrictions of the clients for which it advises.

Vasquez & Co., Inc. may have the authority to vote proxies for clients, although they are expected to do so themselves.

Clients may obtain a copy of Vasquez & Co., Inc.'s complete proxy voting policies and procedures upon request. Clients may also obtain information from Vasquez & Co., Inc. about how Vasquez & Co., Inc. voted any proxies on behalf of their account(s).

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Vasquez & Co., Inc.'s financial condition.

Vasquez & Co. has discretionary authority over client funds and securities but does not hold custody over them. Vasquez & Co. custodies its client assets and securities with a separate, third-party custodian. Vasquez & Co. does not require, or solicit prepayment of more than \$500 in fees per client, six months or more in advance.

Vasquez & Co., Inc. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Daniel W. Vasquez , Founder (Principal Executive Officer and Key Management Person)

Education

- University of Oxford, Pembroke College, Said Business School (MBA in finance, 2014; PGD in global business, 2012)
- The University of Chicago (MPP, Economic Policy, 1996);
- University of California at Berkeley (BA, Ethnic Studies, 1994);
- Princeton University (Certificate, Public & Int'l Affairs, 1992).

Business background

- Vasquez & Co., Founder, Economist, & Portfolio Manager, 2008-present;
- Hamilton Lane Advisors, LLC (Private Equity Asset Management), Vice-President & Portfolio Manager, 2007-2008;
- Morgan Stanley, Global Wealth Management Group, Investment Adviser, 2004-2007;
- Harvard Business School, Institute for Strategy & Competitiveness, Research Associate, 1998-2002;
- The Conference Board, Economics Department, Research Analyst, 1996-1998;
- Legislative Aid, United States Senate, 1994.

Licenses & designations

- Uniform Combined State Law, Investment Adviser (Series 66);
- General Securities Representative (Series 7);
- Futures Managed Funds (Series 31);

There is no other business in which Daniel W. Vasquez is actively engaged other than giving investment advice. Daniel W. Vasquez is not engaged in any performance-based fee schemes. Daniel W. Vasquez has not been involved in any award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500; or in a civil, self-regulatory organization, or administrative proceeding involving the any of the following: an investment or an investment related business or activity; fraud or, false statement(s), or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices. Daniel W. Vasquez does not have any relationship or any arrangement with any issuer of securities.

