

Item 1: Cover Page

## ADV Part 2A Brochure



### DYNAMIC IDEAS FINANCIAL, LLC

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[www.DynamicIdeasFinancial.com](http://www.DynamicIdeasFinancial.com)

March 2015

This brochure provides information about the qualifications and business practices of Dynamic Ideas Financial, LLC. If you have any questions about the content of this brochure, please contact us at 781-583-7010 or by email at [cco@dynamicideasfinancial.com](mailto:cco@dynamicideasfinancial.com). 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.

Dynamic Ideas Financial, LLC is registered as an SEC Investment Advisor. Registration as an Investment Advisor does not imply any level of skill or training.

Additional information about Dynamic Ideas Financial, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Dynamic Ideas Financial, LLC is 169196.

## Item 2: Summary of Material Changes

This Firm Brochure provides a summary of Dynamic Ideas Financial's advisory services and fees, professionals, certain business practices and policies, as well as actual or potential conflicts of interest, among other things.

This Item is used to provide Clients with a summary of material changes as defined by the Commission including additional information we deem to be relevant for our current and prospective clients. The revision(s) are based on the nature of the information detailed below.

- **Material Changes:** Should a material change in our operations occur, depending on its nature Dynamic Ideas Financial will promptly communicate this change to Clients (and it will be summarized in this Item). "Material changes" requiring prompt notification will include changes of ownership or control; location; disciplinary proceedings; significant changes to our advisory services or advisory affiliates – any information that is critical to a Client's full understanding of who we are, how to find us, and how we do business.
- **Annual Update:** Advisors are required to update certain information at least annually, within 90 days of our firm's fiscal year end (FYE) of December 31<sup>st</sup>. Dynamic Ideas Financial will provide clients with either a summary of the revised information with an offer to deliver the full revised Brochure within 120 days of our FYE or we will provide clients with our revised Brochure that will include a summary of those changes in this Item.

### Annual Update

The following summarizes new or revised disclosures based on information previously provided in our Firm Brochures dated September 2014. An annual update will be made 90 days following our fiscal year end.

### Material Changes

As of March 2015 Dynamic Ideas Financial, LLC has the following material changes to report:

The town of Waltham has changed our mailing address from 411 Waverley Oaks Road, Suite 327 Waltham, MA 02452 to 465 Waverly Oaks Road, Suite 315 Waltham, MA 02452. The physical building and office location has not moved or changed.

If you would like to receive a complete copy of our brochure, please contact us at 781-583-7010 or by email at [cco@dynamicideasfinancial.com](mailto:cco@dynamicideasfinancial.com).

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## Item 4: Advisory Business

### Firm Description and History

Dynamic Ideas Financial LLC ("DIF" or "Firm") is an "internet investment adviser," as that term is defined by the SEC. The Firm provides investment advice exclusively through interactive websites which employ computer software-based models and applications to provide investment advice to clients based on personal information provided by each client through the websites. (DIF is also permitted to have a very limited number of additional clients.) The Firm does not manage client portfolios and does not have discretion or custody over client accounts. The Firm does provide its clients with assistance in the technical aspects of accessing and using the interactive websites, but its personnel do not communicate directly with clients with regard to the clients' investments.

DIF was established in September 2013 and currently has 6 employees working in the Firm's Waltham, MA office. DIF is organized as a Massachusetts limited liability company whose members hold 100% of the equity interest in the Firm, with Dimitris Bertsimas, the Firm's managing partner and Chief Investment Officer, holding more than 25%.

The principal owners have over 75 years of experience in the financial services industry. For more information about the management team please consult the Brochure Supplement.

### Advisory Services

The Firm is an internet investment management firm specializing in offering online investment advice and financial advice for the totality of a family's financial situation, using optimization-based computer algorithms.

The Firm provides two types of investment advisory service. The first is our basic service, RetireSavvi/ThinkSavvi. This service provides advice on retirement accounts for funding a retirement savings goal or a retirement income goal. RetireSavvi/ThinkSavvi clients receive a personalized strategy which includes advice on asset location, asset allocation, contributions/withdrawals, Roth conversion, Social Security election, retirement age, debt payoff, required minimum distributions (RMD), etc. The second service is our enhanced service, RetireSavvi enhanced or ThinkSavvi Enhanced. RetireSavvi/ThinkSavvi Enhanced clients receive all the services describe in the first level, expanded to include all account types, multiple non-retirement related financial goals, including but not limited to house acquisition, car replacement and college funding, as well as financing advice.

### Strategy and Objective

DIF's recommendations are customized to the individual needs of the users of its websites as reflected in their responses to various questions and their input of basic information including, among other things, their age, income, assets and spending goals. Based on the answers provided, DIF provides financial advice that is tailored to the user's profile. The Firm employs its own proprietary methodology and technology in making its recommendations.

Dynamic Ideas Financial does not manage client assets and does not have custody over the assets of any user, does not exercise discretionary authority over any user's account, and does not execute trades for users. Users must make an independent determination of whether to

follow any recommendation made by the website, and must make their own arrangements to effect any of the website's recommendations.

Although Dynamic Ideas Financial systems carefully consider the investment objectives and goals of each client, their investment advice is based and restricted by the information provided by the client. Clients sign an online contract with the Firm and after this they are requested to enter their financial information into the Dynamic Ideas Financial automated system. This information is not reviewed for accuracy by any Dynamic Ideas Financial personnel. Therefore the burden of providing valid accurate information lies with the client.

Client investment choices are not limited to any specific product or service offered by a broker dealer or insurance company.

Clients should be aware of investment risks and other risks, restrictions on withdrawals, and other information relevant to their investment. Additional information on certain investment risks is provided under Item 8, subsection *Market, Security and Regulatory Risks* below.

### Tailored Advisory Services

Advisory services recommendations are tailored to the individual needs of the individual client. DIF provides investment advice only with respect to limited types of investments in ETFs and mutual funds.

### Wrap Fee Programs

Wrap fee programs generally are arrangements where clients are charged a single fee for both advisory services and brokerage commissions. Dynamic Ideas does not participate in wrap fee programs.

### Assets Under Management

The Firm does not manage individual client accounts, but rather provides asset allocation advice. Assets under management are \$0.

## Item 5: Fees and Compensation

Prior to engaging Dynamic Ideas Financial, the client will be required to enter into a written user agreement with the Adviser setting forth the terms and conditions.

### Standard Fee Schedule

The Firm currently offers two levels of service, Basic (RetireSavvi/ThinkSavvi) and Enhanced (RetireSavvi/ThinkSavvi Enhanced). For these services the Firm charges the following maximum fees:

For individual users, the maximum fee for Basic Service is \$20/month and the maximum fee for Enhanced Service is \$30/month. Employers who contract with DIF to make the services available to their employees may chose one of the following options: (1) pay the monthly fee at the standard rates based on the number of employees who utilize the site, or (2) pay an aggregate monthly fee based on the total number of employees, at a maximum rate of

\$5/month per employee for Basic Service and \$7.50/month per employee for Enhanced Service.

Notwithstanding this fee schedule, and subject to applicable laws and regulations, the Firm retains discretion over the fees that it charges to its clients, as well as any changes in its fee schedules. Fees may be negotiated or modified at the Firm's sole discretion. DIF may agree to offer clients a fee schedule that is lower than that of any other comparable clients in the same investment style or a fee that is higher than other clients. For comparable services, other investment advisers may charge higher or lower fees than those charged by DIF. Dynamic Ideas Financial reserves the right to waive all or a portion of its fee. The standard fee schedule above may be modified from time to time.

For individuals, payment of the monthly fee is required to obtain initial and continued access to the site. For employers, fees are paid in advance based on the fee schedule detailed in the agreement and agreed upon by DIF and the employer.

No fees are deducted from the user's account. Users who wish to purchase these services are billed online by a third party unaffiliated with Dynamic Ideas Financial. DIF may run promotions or introduce discounts and special offers from time to time.

DIF has licensed its Savvi financial planning software to an advisory affiliate, Alpha Dynamics LLC, which may use it in providing ongoing services to its clients, or to provide a one-time plan to a prospective client. Under the license agreement, Alpha Dynamics pays DIF a fee of \$30 for a one-time plan to a prospective client or \$30/month per client for ongoing services. DIF may enter into similar agreements with other investment advisers under terms to be negotiated separately. As part of such agreements, DIF may provide a customized private-label portal for the adviser.

### Other Expenses Paid by Clients

Due to the nature of the Firm's service offering there are no brokerage, custody, transactional or similar fees or expenses associated with the operation of the account by DIF or use of the product. If users decide to act on DIF recommendations they may incur such expenses in their investment accounts.

### Mutual Fund, Other Pooled Investment Vehicles, and ETF Fees and Expenses

Dynamic Ideas Financial may recommend that users consider purchasing in mutual funds, ETFs or other pooled investment vehicles (collectively, "Funds"). Such Funds typically incur expenses that are paid out of the Funds' assets (and thereby affect the investment return), such as investment advisory fees paid to the Fund's adviser, service fees, and in the case of mutual funds, may also include sales loads, redemption fees and distribution expenses. These expenses are in addition to the fee paid by the client to Dynamic Ideas Financial. These fees are disclosed in the Fund's prospectus, offering memorandum, or in shareholder reports.

### Brokerage and Custodial Fees

If the user effects the DIF recommendations they may also incur transaction, brokerage, and custodial fees.

Other transaction fees which be associated with acting on DIF's recommendations payable by users may include sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Fees may also include custodial fees, consulting fees, administrative fees, and transfer agency fees charged by third parties in connection with the account.

### Account Termination

Individuals account users or DIF may terminate without advance notice. However, no portion of the monthly fee will be refunded. Employers who enter into agreement with DIF to provided access with services to the employees or Dynamic Ideas Financial may terminate their agreement as shall be provided in separately negotiated agreement between Employer and DIF. Upon termination of Employer account, any earned, unpaid fees will be due and payable or refunded to the client, as appropriate and agreed upon, in a timely manner. In general, such fees are pro-rated from the date of termination to the end of the period to which the advance fee is applied.

### Item 6: Performance-Based Fees and Side-by-Side Management

Performance-based fees are fees based on a share of capital gains on or capital appreciation of the assets of a client. (i.e. client that is a hedge fund or other pooled investment vehicle). Dynamic Ideas Financial does not charge performance-based fees.

### Item 7: Types of Clients

As noted in Item 4, Dynamic Ideas Financial provides online investment management services to individuals, including high net worth individuals. There is no minimum or maximum net worth for DIF's services.

To access our services (both basic and standard services) the user is required to set up an account so that the Firm can maintain the privacy and security in relation to the user's confidential information and save the user's profile for future visits to the website.

The user is also required to acknowledge agreement with our Terms of Use and Investor Agreement which are available on the website.

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

#### Quantitative Analysis

Our method of investment management utilizes quantitative methods and optimization for providing long-term multi-period account transfers and asset allocation advice. Quantitative methods and optimization formulations are based on models that we have developed and researched extensively. We use models that we find have produced attractive returns in the past (either on an absolute and or/risk-adjusted bases) to make future asset allocation selections. The models are based on characteristics that have historically indicated strong potential asset classes.

Asset allocation advice should be recalculated periodically, but DIF does not do this automatically. It is the client's responsibility to change or add to their profile whenever they believe their situation or prevailing circumstances have changed. Data for our models comes



from industry leading data providers whom we believe to be reliable, although there can be no guarantee that such data is always free of error.

### Investment Strategies

**Stable Growth:** A multi-asset strategy that seeks long-term returns equal to the CPI + 4% (5-7%) with a target average annualized volatility of 4% while seeking to limit worst trailing twelve-month loss to no more than -5%. The strategy invests in a combination of liquid instruments including exchange-traded funds (ETF's) representing investments in equity, fixed income, cash and alternative asset classes.

**Robust Growth:** A multi-asset strategy that seeks long-term returns similar to the long-term average of the S&P500 index (8-10%) with a target average annualized volatility of 6% while seeking to limit worst trailing twelve-month loss to no more than -10%. The strategy invests in a combination of liquid instruments including exchange-traded funds (ETF's) representing investments in equity, fixed income, cash and alternative asset classes.

**Dynamic Growth:** A multi-asset strategy that seeks to maximize long-term returns in excess of the S&P 500 (10%+) with a target average annualized volatility of 8% while seeking to limit worst trailing twelve-month loss to no more than -15%. The strategy invests in a combination of exchange-traded funds (ETF's) representing investments in equity, fixed income, cash and alternative asset classes.

### Market, Security and Regulatory Risks

Investments in financial instruments and products are subject to many types of risk that can cause the permanent loss of capital. The asset allocation strategies proposed by Dynamic Ideas Financial carry different levels and types of risk. All asset classes include a risk of loss of principal and any profits that have not been realized. The stock and bond markets fluctuate substantially over time and, as recent global and domestic economic events have indicated, performance of any investment is not guaranteed. As a result, there is a risk of loss of assets, and such a loss may not have been predicted by our models. We cannot guarantee any level of performance and cannot guarantee that clients will not experience a loss of value in their accounts. In addition, poor investment selection could cause our asset allocation suggestions to underperform other investment accounts or products managed by other firms.

Equity investments are subject to certain risks. Market prices of equity securities may fall rapidly or unpredictably and will rise and fall due to changing economic, political or market conditions or in response to events that affect particular industries or companies. Equity investments generally have greater price volatility than fixed-income investments. Because their prices tend to reflect future investor expectations, growth stocks may be more sensitive to change in current or expected earnings than other types of stocks and tend to be more volatile than the market in general. Growth stocks also may underperform value stocks and other investments during given periods.

As noted above, each of DIF's investment suggestions has the potential for clients' assets to decline in value. Some of the specific risks to which client assets may be susceptible include sector risk, concentration risk, geopolitical risk, small- and mid-capitalization company risk, and large-cap stock risk.



### Market Risks

Investments in securities and other financial instruments and products are subject to many types of risk that can cause the permanent loss of capital. The investment strategies utilized by Dynamic Ideas Financial carry different levels and types of risk. In each strategy, all securities include a risk of loss of principal and any profits that have not been realized. The stock and bond markets fluctuate substantially over time and, as recent global and domestic economic events have indicated, performance of any investment is not guaranteed. As a result, there is a risk of loss of the assets the Firm manages on behalf of its clients, and such a loss may be out of our control. We cannot guarantee any level of performance and cannot guarantee that clients will not experience a loss of value in their account. In addition, poor investment selection could cause our investment strategies to underperform other investment accounts or products managed by other firms under similar investment strategies.

*Market Volatility.* The profitability of the portfolios substantially depends upon the Advisor correctly assessing the future price movements of stocks, bonds, options on stocks, and other securities and the movements of interest rates. Dynamic Ideas Financial cannot guarantee that it will be successful in accurately predicting price and interest rate movements.

*Sector Risk.* Investment strategies focused on or concentrated in a single sector may be affected by particular economic or market events and could be more volatile than a strategy with securities across industry sectors.

*Concentration Risk.* Concentrated portfolios that invest in a relatively small number of securities may have more risk because changes in the value of a single security or the impact of a single economic, political or regulatory occurrence may have a greater adverse impact on the strategy's performance.

*Geopolitical Risk.* The change in political status of any country can have profound effects on the value of investments exposed to that country.

*Large-Cap Stock Risk.* Investment strategies focusing on large-cap companies may underperform other equity investment strategies as large-cap companies may not experience sustained periods of growth in the mature product markets in which they operate.

*Small- and Mid-Capitalization Company Risk.* The stocks of small- and mid-capitalization companies often have greater price volatility, lower trading volume and less liquidity than the stocks of larger, more established companies.

*Accuracy of Public Information.* The Advisor selects investments, in part, on the basis of information and data filed by issuers with various government regulators or made directly available to the Advisor by the issuers or through sources other than the issuers. Although the Advisor evaluates all such information and data and sometimes seeks independent corroboration when it's considered appropriate and reasonably available, the Advisor is not in a position to confirm the completeness, genuineness, or accuracy of such information and data. In some cases, complete and accurate information is not available.

*Market or Interest Rate Risk.* The price of most fixed income securities moves in the opposite direction of the change in interest rates. For example, as interest rates rise, the price of fixed

income securities falls. If the account holds a fixed income security to maturity, the change in its price before maturity may have little impact on the account's performance; however, if the Advisor has to sell the fixed income security before the maturity date, an increase in interest rates could result in a loss to the account.

***Inflation Risk.*** Inflation risk results from the variation in the value of cash flows from a security due to inflation, as measured in terms of purchasing power. For example, if the Advisor purchases a 5-year bond in which it can realize a coupon rate of 5%, but the rate of inflation is 6%, then the purchasing power of the cash flow has declined. For all but inflation-linked bonds, adjustable bonds or floating rate bonds, the account is exposed to inflation risk because the interest rate the issuer promises to make is fixed for the life of the security.

***Non-U.S. Investments.*** Investing in the financial instruments of companies (and, from time to time, governments) outside of the United States involves certain considerations not usually associated with investing in financial instruments of U.S. companies or the U.S. Government, including political and economic considerations, such as greater risks of expropriation, nationalization, confiscatory taxation, imposition of withholding or other taxes on interest, dividends, capital gains, other income or gross sale or disposition proceeds, limitations on the removal of assets, and general social, political and economic instability; the relatively small size of the securities markets in such countries and the low volume of trading, resulting in potential lack of liquidity and in price volatility; the evolving and unsophisticated laws and regulations applicable to the securities and financial services industries of certain countries; fluctuations in the rate of exchange between currencies and costs associated with currency conversion; and certain government policies that may restrict the client's investment opportunities. In addition, accounting and financial reporting standards that prevail outside of the U.S. generally are not as high as U.S. standards and, consequently, less information is typically available concerning companies located outside of the U.S. than for those located in the U.S. As a result, we may be unable to structure transactions to achieve the intended results or to mitigate all risks associated with such markets. It may also be difficult to enforce the client's rights in such markets. For example, financial instruments traded on non-U.S. exchanges and the non-U.S. persons that trade these instruments are not subject to the jurisdiction of the SEC or the securities laws and regulations of the U.S. Accordingly, the protections accorded to the client under such laws and regulations are unavailable for transactions on foreign exchanges and with foreign counterparties.

***Risk of Default or Bankruptcy of Third Parties.*** The Advisor may engage in transactions in financial instruments and other assets that involve counterparties. Under certain conditions, the account could suffer losses if a counterparty to a transaction were to default or if the market for certain securities or other financial instruments and/or other assets were to become illiquid.

### **Regulatory Risks**

***Strategy Restrictions.*** Certain Clients (e.g. ERISA clients) may be restricted from directly utilizing investment strategies of the type in which the Advisor may engage, or may restrict the Advisor from utilizing them, e.g., the use of leverage. Clients which may be so restricted should consult their own advisors, counsel, and accountants to determine what restrictions may apply or may be appropriate.

**Trading Limitations.** For all securities, instruments and/or assets listed on an exchange, including options listed on a public exchange, the exchange generally has the right to suspend or limit trading under certain circumstances. Such suspensions or limits could render certain strategies difficult to complete or continue and subject the account to loss. Also, such a suspension could render it impossible for the Advisor to liquidate positions and thereby expose the Account to potential losses.

### **Security Specific Risks**

**Liquidity.** Liquidity is the ability to readily convert an investment into cash. Securities where there is a ready market that is traded through an exchange are generally more liquid. Securities traded over the counter or that do not have a ready market or are thinly traded are less liquid and may face material discounts in price level in a liquidation situation.

**Currency.** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

### **Item 9: Disciplinary Information**

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material in the evaluation of Dynamic Ideas Financial or the integrity of the firm's management. Dynamic Ideas Financial along with its principal owners and employees have not been disciplined by any governing authority, including any regulatory agency, CFP Board of Standards, or any industry association of which they are licensed and/or are members.

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

DIF is cooperating with Dynamic Ideas LLC and Alpha Dynamics LLC, a registered Investment Adviser. Any product offered by these two companies is not and will not be in the future offered as a condition for supplying services to DIF clients.

Dynamic Ideas Financial has arrangements with an affiliated company, Alpha Dynamics, LLC ("Alpha" or "AD"), as a registered investment adviser providing investment advisory services.

Members of our firm's management are also owners and managers of Alpha and are also compensated by Alpha. In that capacity, these individuals provide advisory services through Alpha. Clients choosing to implement DIF's recommendations through Alpha Dynamics should also refer to Alpha Dynamics's Firm brochure or other disclosure documents for details regarding that firm's services and fees.

DIF's services are not and will not be in the future offered as a condition for supplying other financial or investment advice to Dynamic Ideas Financial clients. Existing or new clients may ask for any of Dynamic Ideas Financial's offered services, individually or as a bundle.

DIF is only offering internet-based financial planning and asset allocation services, and does not have custody or discretion in client accounts. It is bound by the SEC's internet adviser rules, and as such it only offers such services through computer algorithms. DIF's clients may choose to implement DIF's suggestions themselves or through another investment adviser. Alpha Dynamics, on the other hand, has discretion over client accounts and offers full investment

advisory service. Since the services and type of clients and accounts are disjoint between the two companies we do not consider that there is any conflict of interest.

Dynamic Ideas Financial does not recommend or select other investment advisers for its clients.

Neither Dynamic Ideas Financial nor its principal owners are registered or have an application pending to register as a broker-dealer or registered representative of a broker-dealer.

Neither Dynamic Ideas Financial nor its principal owners are registered or have an application pending to register as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

Dynamic Ideas Financial does not have any material business relationships with other investment advisors that it recommends or selects for Clients.

### Item 11: Code of Ethics, Participation in Client Transactions and Personal Trading

The Advisor strives to observe the highest industry standards of conduct based on its obligation as a fiduciary to its Clients. In an effort to meet this obligation, Dynamic Ideas Financial adopted a written Code of Ethics (the "Code") that is applicable to all employees. Each employee will be provided a copy, and is required to acknowledge, in writing, that they have received, read, understand and will abide by, the Code, and DIF's Compliance Manual, upon commencement of employment and upon any material change to the Code.

The Code requires that employees act in the Client's best interests and comply with applicable laws and regulations. Employees are expected to avoid any action that is, or could even appear to be, legally or ethically improper. The principles outlined in the Code apply to all conduct, whether or not the conduct is also covered by more specific standards or procedures set forth in the Code, Compliance Manual, or elsewhere. Employees are required to bring any violations, actual or suspected, of the Code immediately to the attention of DIF's Chief Compliance Officer ("CCO"). Failure to comply with the Code may result in disciplinary action or other sanctions including termination of employment.

The Code also places certain restrictions on the personal trading activities of employees and their immediate family members. Employees may generally engage in personal trading only by obtaining prior approval and subject to pre-clearance by the Chief Compliance Officer. However, employees may purchase and sell open-end mutual funds, exchange traded funds ("ETFs"), and any other securities not specifically prohibited by the Code without pre-clearance. Employees are required to disclose their personal securities holdings annually and personal securities transactions quarterly to the Chief Compliance Officer. Employees may also participate in limited offerings such as hedge funds, private equity funds, or other types of private offerings, subject to pre-clearance procedures.

A copy of the Code of Ethics shall be provided to any client or prospective client upon request.

Material components of the Code, in summary form, include:

*Standard of Business Conduct.* It is the responsibility of all employees to ensure that the Advisor conducts its business with the highest level of ethical standards and in keeping with its fiduciary duties. Employees have a duty to place the interest of the Clients first, and to refrain from having outside interests that conflict with the interests of its Client(s).

*Prohibited Conduct.* The Advisor's employees must avoid any circumstances that might adversely affect or appear to affect their duty of complete loyalty to clients.

*Privacy of Client Information.* All information relating to Clients' portfolios and activities, and proposed recommendations is strictly confidential. Consideration of a particular purchase or sale may not be disclosed, except to authorized persons.

*Personal Securities Transactions.* All employees shall comply with the Advisor's personal account trading policy summarized below.

*Conflicts of Interest.* Employees may not use any confidential information or otherwise take inappropriate advantage of their positions for the purpose of furthering any private interest or as a means of making any personal gain. Employees and their immediate families may not accept any benefit from clients or any person who does business with the Advisor, other than business courtesies and non-cash gifts of nominal value.

*Service as a Director.* No employee may serve as a director of a publicly-held company without prior approval by the Chief Compliance Officer based upon a determination that service as a director would not be adverse to the interest of clients.

*Reporting of Violations.* Employees are required to promptly report all actual or potential conflicts of interest, violations of any government or regulatory law, rule or regulation, or violations of the Advisor's policies and procedures.

*Training.* Formal ethics training for all employees will occur on a periodic basis.

*Review and Enforcement.* The CCO is responsible for ensuring adequate supervision over the activities of all persons who act on the Advisor's behalf in order to prevent and detect violations of the Code by such persons.

*Participation or Interest in Client Transactions and Personal Securities Trading.* All employees shall comply with the procedures governing personal securities transactions set forth in the Code. Such procedures are designed, among other matters, to assist the CCO in avoiding potential conflicts of interests and detecting and preventing abusive trading practices such as "scalping" or "front running" and to highlight potentially abusive "soft dollar/Client commission" or brokerage arrangements. Strict compliance with the Advisor's personal trading policy is essential to the Advisor and its reputation. Any violation of the Advisor's personal trading policy can be grounds for immediate dismissal by the Advisor of any employee. Every employee of the Advisor is expected to be familiar with the personal trading policy and the procedures contained therein. These matters can be reviewed with the CCO at any time.

The CCO shall maintain current and accurate records of all personal securities transactions in which employees have a direct or indirect beneficial interest. The following restrictions shall apply to securities transaction(s) by employees of the Advisor and their related persons:

*Restricted Securities.* The Advisor shall maintain a restricted list of securities for which no trading by employees is allowed, e.g. because the Advisor may have material non-public information.

*Initial Report.* An employee shall, no later than 10 days after the employee begins its relationship with the Advisor, provide the Advisor with brokerage account statements, which are as of a date that is within 45 days of the date the employee submits them to the Advisor, and complete and submit a list of brokerage accounts.

*Quarterly Reports.* On a quarterly basis all employees shall submit to the CCO a personal securities transaction report.

*Annual Report.* Following the completion of each calendar year, employees must resubmit a list of personal brokerage accounts.

*Record-Keeping Requirements.* The CCO shall establish a form to record personal securities transactions.

## Item 12: Brokerage Practices

DIF does not manage, does not have discretion, and does not have custody of any client accounts. Therefore we do not have any connection with brokers on behalf of our clients.

### Research and Soft Dollars

Dynamic Ideas Financial does not engage in soft dollars.

### Allocation and Aggregation

Dynamic Ideas Financial does not allocate or aggregate trades.

### Directed Brokerage

Dynamic Ideas Financial does not direct brokerage.

## Item 13: Review of Accounts

DIF does not manage, does not have discretion, and does not have custody of any client accounts. Financial Plans are not individually reviewed and there is no active account management. If a user experiences significant changes in his/her financial situation it is the responsibility of the user to input the updated relevant information to receive an updated recommendation.

DIF may from time to time send alerts, emails and other notifications to users if our system detects particular conditions that may be relevant to a user based on the user's preferences as indicated to us via the website.



DIF technical personnel may review plans to assure quality control but will not review investment recommendations or whether the user has updated all relevant information.

### Item 14: Client Referrals and Other Compensation

DIF has referral agreements with third-parties under which they solicit employers who may want to offer DIF's services to their employees. Such activities are conducted in compliance with Rule 206(4)-3 of the Investment Advisers Act of 1940 ("The Act"). The individuals who engage in solicitation activities on behalf of DIF who are not employees are nevertheless subject to DIF's supervision and control with regard to such activities and are therefore regarded by DIF as Investment Advisor Representatives (IAR) as defined in Rule 203A-3(a)(1). The IAR's activities are limited to soliciting prospective employers who may be interested in providing DIF services as an employee benefit. Such solicitors are subject to the standards of conduct of DIF's Code of Ethics and their contacts with and materials provided to prospective clients are subject to DIF's advance approval. If the solicitation is successful, the solicitor will receive a specified percentage of the fees paid by the client.

Since the Solicitor's portion of the total fee charged is negotiated between the Solicitor and Dynamic Ideas Financial, a solicited client may pay more or less than another solicited client for the same services, and the total fee charged to a client that has been successfully solicited may be higher than the fee charged to other clients for the same service.

Such solicitor arrangements will comply with the requirements set forth in Rule 206(4)-3 of the Investment Advisers Act of 1940. Solicited Clients will receive a document (i.e. Disclosure Statement) that discloses the solicitation relationship, defines the compensation arrangement between Dynamic Ideas Financial and the Solicitor, also specifies whether the client pays a higher fee because of this arrangement. The client must sign a written acknowledgement of receipt of the Disclosure Statement. Refer to Item 4 for a discussion on the services which may be provided by Solicitors.

Dynamic Ideas Financial only accepts solicited clients from states where the solicitor is properly registered, or not required to register and not subject to any regulatory disqualifications.

### Item 15: Custody

DIF does not manage or have discretionary authority over any client accounts, and does not have custody of any client accounts.

### Item 16: Investment Discretion

DIF does not manage, does not have discretion, and does not have custody of any client accounts.

### Item 17: Voting Client Securities

Because Dynamic Ideas Financial does not manage client accounts DIF has no authority to vote shares of any client securities.

### Item 18: Financial Information



Registered Investment Advisers are required in to provide certain financial information or disclosures about their financial condition.

#### Balance Sheet

A balance sheet is not required to be provided because the Advisor does not serve as a qualified custodian and does not require prepayment of fees of more than \$1,200 and six months or more in advance.

#### Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

The Advisor does not have any financial impairment that will preclude it from meeting contractual commitments to Clients.

#### Bankruptcy Petition during the Past Ten Years

Not applicable to Dynamic Ideas Financial or its principal owners.

#### Miscellaneous

*Privacy:* Dynamic Ideas Financial prohibits the disclosure of any client-related non-public personal information as collected by the firm throughout the client/firm relationship. However, Dynamic Ideas Financial may make limited disclosure of such information as authorized by the client, or as otherwise provided by law. A copy of DIF's Privacy Policy will be provided to each client upon inception of the relationship and annual thereafter.

*Business Continuity:* Dynamic Ideas Financial has made preparations via a planning document to expedite the resumption of business in the event of a major disruption. Among other issues, the plan details how clients may access their accounts in the event of an emergency. A copy of the Business Continuity Plan is available for review by request.