

# Item 1

## Disclosure Brochure

May 31, 2017



### Fiduciary Financial Services Wealth Management

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A Subsidiary of Wunderlich Investment Company

**SEC File Number: 801-37185**

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This brochure provides information about the qualifications and business practices of Fiduciary Financial Services Wealth Management. If you have any questions about the contents of this brochure, please contact us at (972) 934-9070 or info@ffss.net. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Fiduciary Financial Services Wealth Management also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## **Item 2: Material Changes**

We discuss here only material changes since the last annual update of our brochure dated September 28,2016.

- Clarissa Risner was named President in May.

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Under federal and state law, we are a fiduciary and must make full disclosure to you of all material facts relating to our relationship with you. We must seek to avoid conflicts of interest with you. At a minimum, we must make full disclosure of all material conflicts of interest between the two of us that could affect our relationship.

We must provide you with sufficiently specific facts so that you are able to understand our conflicts of interest and business practices and can give informed consent to such conflicts or practices or reject them. We provide you with this disclosure brochure to help you make an informed decision about us.

## **Item 4: Advisory Business**

In this section, we describe who we are, how long we have been in business, who our principal owners are, and what services we provide.

We are an investment advisory firm that was established in 1990. Our owner is Wunderlich Investment Company, Inc (WIC). As of June 30, 2016, we manage \$351,355,330 on a discretionary basis and \$12,579,920 on a non-discretionary basis. We provide the following services.

### Investment Management

We primarily seek to manage your assets on a discretionary basis. Whether discretionary or non-discretionary, we evaluate your financial condition and risk tolerance in order to tailor our securities recommendations to meet your

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investment objectives and individual needs. Our securities recommendations primarily involve companies with sustainable high dividend yields, such as publicly traded partnerships, real estate investment trusts, convertible preferreds, and royalty trusts. We strive to maintain a fully-invested, diversified portfolio of securities. We will assist you in selecting an investment objective based on your articulated needs. You may impose restrictions on investing in certain securities or types of securities.

Retirement Planning

We review your retirement package when requested to help you determine your retirement income goals and the actions and decisions necessary to achieve those goals. We can assist in forecasting your income, analyzing your income taxes to help you minimize them, and calculating your minimum required distribution amount.

Financial Planning

We prepare cash flow analysis and income projections for you when requested. We do not provide comprehensive certified financial plans for you.

Estate Planning

We review your existing estate plan and make recommendations we deem appropriate when requested. We can set up powers of attorney to cover your

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healthcare and financial decisions. We can provide assistance to your executor in the probate process as well as in the estate's accounting process.

Tax Return Preparation

We prepare trust tax returns as requested by clients and remind you to pay your estimated tax. Services are performed by an employee. We are not a licensed accounting firm and do not hold ourselves out as an accounting firm.

Participant Loan Administration

We prepare loan documents for pension and profit sharing plans when requested. We process principal and interest payments, maintain records of payments and balances, and follow up on delinquencies.

**Item 5: Fees and Compensation**

In this section, we describe how we are compensated for our services, how we collect our fees, and what other fees and expenses you may pay.

We charge 1% annually for our investment management service. We and our employees do not receive compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds. We recommend and select investment products for you based on your needs and not on any financial incentive related to the product.

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The management fee is negotiable. Some factors we consider when negotiating the fee amount are: the length of the relationship, the size of the account, the extent of personal servicing, and whether an account is directly or indirectly affiliated with a client. As a result, you may pay a different fee from another client for the same services from us.

The management fee is determined quarterly by the average market value of assets, which includes funds borrowed on margin, at the end of each month within the previous quarter. Unless negotiated otherwise, we include assets resulting from trades that you direct as well as from any outstanding participant loans in the fee calculation.

Fees are charged quarterly in advance. You may terminate your relationship with us by notifying us in writing. We consider the relationship to be terminated on the 30<sup>th</sup> day after the date of receipt of your written notice. In the event of termination, we will prorate and either refund to you any unearned fees or charge you for earned fees not yet collected.

Our preferred method of collection is to deduct fees. However, you may select to pay the management fee by a check instead. Each quarter, we will notify you and your custodian of the amount of the fee due and payable to us. The custodian will deduct the fee from your account. If you have more than one account, the custodian will deduct the fee from the account you have designated. The custodian does not validate or check our fee calculation. If you select to pay by a check, we will send you an invoice for our services and you pay us within 30 days of the due date.

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The management fee payable to us does not include all the fees you will pay when we purchase or sell securities for your account. The following list of fees or expenses are what you pay directly to third parties, whether a security is being purchased, sold, or held in your account under our management. We do not receive any of these fees charged to you. They are paid to your broker, custodian, or the mutual fund or other investment you hold. Depending on what you have selected, you may incur the following expenses in connection with our advisory services:

- SEC fee;
- Wire fee;
- Margin fee;
- Custody fee;
- Exchange fee;
- Check order fee;
- Returned check fee;
- Stop payment fee;
- Insufficient funds fee;
- Deposit item returned fee;
- Account fee;
- Account inactivity fee;
- Account transfer fee;
- Account termination fee;
- Foreign security fees;
- Safekeeping fee;
- Lost certificate fee;



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- Markups, markdowns and spreads;
- Management fees for mutual funds and exchange traded funds (ETFs);
- Mutual fund sales charges or service fees; or
- Brokerage costs and transaction costs.

For more information about the brokerage and transaction costs, please refer to the brokerage practices section.

We charge a \$150 set up fee to prepare loan documents for our participant loan administration service. This fee is collected directly from the participant at the time the loan papers are signed. The fees related to retirement planning, estate planning, and tax return preparation services are negotiated with each client.

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

We describe in this section any additional compensation we may charge based on the performance of your account and how we make investment decisions for accounts that we charge a performance-based fee and for accounts that we do not charge a performance-based fee.

We and our employees do not charge performance-based fees – that is, compensation based on a percentage of total assets managed that is paid to us if we deliver returns above a specified benchmark.

## **Item 7: Types of Clients**

We describe the types of clients we provide investment advice to and any requirements for opening or maintaining an account here.

We generally provide advice to individuals, corporations, government entities, trusts, estates, and pension and profit sharing plans. We do not require you to have a minimum account size to provide services to you.

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

We describe in this section the analysis methods and investment strategies we use in managing your assets.

Our investment strategy is based on your individual goals, risk tolerance, and cash flow needs. We use a top-down approach in investing. We look at the “big picture” in the economy and financial world and then break those components down into finer details. After looking at the big picture conditions around the world, we analyze the different sectors within the economy in order to select those that are forecasted to outperform the market. We then analyze stocks of specific companies and those that are believed to be successful are chosen as investments.

We analyze major factors that will influence the capital market and the companies in it. The main factors will be the overall economy, monetary and

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fiscal policy, demographic changes, inflation, industrial sector trends, and interest rates.

We use fundamental analysis. We review a company's annual reports, filings with the SEC, press releases in conjunction with research material prepared by others to analyze a stock's real worth. If our analysis shows that the stock is worth more than its price, then we would consider buying the stock.

We sell securities if there is a material deficiency in reported earnings versus our expectations, which is not considered a one-time event, or if there is a material change in the company's operations or business outlook. Among other determinants when selling a security, we consider price movement relative to the purchase price.

We also use income investing, which aims to pick companies that provide a steady stream of income. We strive to find good companies with sustainable high dividend yields, such as publicly traded partnerships, real estate investment trusts, convertible preferreds, and royalty trusts. We look at a company's past dividend policy to determine whether the company can continue with its dividends.

Publicly traded partnerships, also known as master limited partnerships, are companies that own and operate pipelines, primarily for natural gas, oil and refined products. Real estate investment trusts are companies that own and operate income-producing properties such as shopping centers, medical offices, long term care facilities and apartments. Convertible preferreds,

which are convertible into the issuer's underlying common stock, have a high dividend payout and the potential for capital gains should the underlying common shares appreciate. Royalty trusts are entities established as income-producing vehicles to purchase profit interests in mostly oil and gas properties.

We call this group of securities "enhanced income securities." We believe that they produce more income and total return than bonds or certificates of deposit. However, the tax treatment for some in the group is more complex than the treatment of dividends of common shares. Most accounts have some allocation of enhanced income securities because of the cash flow requirements of the account.

Investing in securities involves risk of loss that you should be prepared to bear. All investments in securities include a risk of loss of your principal (invested amount) and any profits that have not been realized (securities not sold to "lock in" the profit). While the enhanced income securities are attractive because of their high dividend yields, they are still securities and the risk of loss of your invested amount applies. There is also the risk that the company will stop paying the dividend.

Performance of any investment is not guaranteed. As a result, there is a risk of loss of the assets we manage that may be out of our control. We will do our very best in the management of your assets. We cannot guarantee any level of performance or that you will not experience a loss of your account assets.

## **Item 9: Disciplinary Information**

We discuss here any legal, financial, or disciplinary events about us that are material to your evaluation of our advisory business or the integrity of our management.

On 6/24/2014, Stephen Bonnema, one of our directors, was sanctioned by the Financial Industry Regulatory Authority (FINRA), a self-regulatory organization for broker-dealers. Without admitting or denying the findings, he consented to the sanctions and to the entry of findings that his employer, Wunderlich Securities, Inc. (WSI), sold, on behalf of customers, approximately 271 million unregistered shares of thinly traded low-priced stocks without first confirming, through a sufficient independent inquiry, that the shares could be sold pursuant to an exemption from registration. The findings stated that because the shares were not covered by a registration statement, the firm could not sell those shares without having confirmed, through a reasonable inquiry, the availability of an exemption from registration.

The findings also stated that WSI, acting through Mr. Bonnema, failed to establish and implement an Anti-Money Laundering (AML) Compliance Program that was reasonably designed to detect, investigate, and report suspicious activity in customer accounts. Mr. Bonnema, as WSI's AML Compliance Officer, was responsible for monitoring customer account activity to ensure for the detection, investigation, and reporting of patterns of activity that might be indicative of money laundering.

In regards to monitoring for potentially suspicious activity, Mr. Bonnema delegated much of that responsibility to branch office managers, while giving them little training beyond what was contained in WSI's written supervisory procedures. Mr. Bonnema failed to adequately supervise the branch managers in their performance of that responsibility. As a result of WSI's inadequate procedures, training and supervision, WSI and Mr. Bonnema failed to detect and investigate potentially suspicious activity in a timelier manner.

Mr. Bonnema consented to a \$5,000 fine, which was paid in full on 7/10/2014, and a 10 business day suspension from association with any FINRA member in a supervisory capacity.

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

Here, we describe our registrations to conduct business in any other capacity besides as an investment adviser and any relationship or arrangement that is material to our advisory business or to you that we or our employees have with a related person.

We are not registered to conduct business in any other capacity besides as an investment adviser. We prepare income tax returns for some of our clients and charge a negotiated fee with each client.

Paul Welch is a licensed attorney and provides legal services to some of our clients. The legal service is incidental to the service that is provided to that client.

James Parrish, a director, is a registered representative and investment adviser representative of WSI and Stephen Bonnema, a director, is a registered representative of WSI, a broker-dealer and investment adviser that our parent company also owns.

Because of this affiliation, we recommended our clients transfer their accounts to WSI to execute their transactions and WSI's clearing firm, First Clearing, LLC to custody their assets. As a result, WSI received a fee for assets directed to First Clearing during a six-month period ending August 22, 2016. This presented a conflict of interest in that the fee WSI received was an indirect compensation to us by virtue of the affiliation.

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

We discuss our code of ethics briefly here and how we address conflicts that arise when we trade in our accounts or when our employees trade in their accounts.

We have adopted a code of ethics that governs a number of potential conflicts of interest we encounter when providing services to you. This code is designed to ensure we meet our fiduciary obligation to you, which is to place your interests ahead of ours. Our code is distributed to each employee at the time of hire and thereafter when there are changes.

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Our code includes the following:

- Prohibitions on insider trading, which is using information not known to the public to make trade decisions;
- Prohibitions on accepting gifts and entertainment that exceed our policy standards;
- Reporting of gifts and business entertainment;
- Pre-clearance procedures of employee and firm transactions;
- Reporting of all personal securities transactions; and
- Certification of compliance with the code.

We will provide a complete copy of our code to you upon written request.

Our code does not prohibit us or our employees from trading in our accounts. As an investment adviser, we follow our own advice. We may purchase or sell the same or similar securities (or securities that are suitable for an employee or our account but not suitable for you) at the time that we place transactions for your account and the accounts of our other clients.

Trading in our own account(s) presents a conflict of interest for us and our employees to the extent that we can use knowledge about pending or currently considered securities transactions for you to profit personally. This is done by placing a trade in our account before we trade in yours and thus receive a better price than you.



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To prevent this from happening, we block our trades with yours and every account receives an average price. We have pre-clearance procedures for when we cannot block our or our employees' trades with those of yours. This procedure is to ensure that we offer the investment opportunity to you before we or our employees may act on them.

Where transactions are effected through WSI, WSI will act on an agency or principal basis to the extent permitted by law, and will be entitled to compensation for its services and will receive other benefits. You authorize WSI to effect "agency cross" transactions (that is, transactions in which WSI acts as broker for both you and the parties on the other side of the transactions) to the extent permitted by law. You understand that WSI will receive compensation from the other parties to such transactions and WSI will have conflicting interests, loyalties, and responsibilities. Because we are affiliated with WSI, we will have conflicting interests, loyalties, and responsibilities when your transactions are executed through WSI. You may revoke this authorization at any time by providing written notice to us.

In a principal transaction, WSI will buy from you or sell from WSI's inventory/account to you instead of buying and selling in the open market. Similar to an agency transaction, we along with WSI will have conflicting interests, loyalties, and responsibilities when executing a principal transaction. We will disclose each principal transaction in writing before the completion of the transaction to you and obtain your consent. It is the intent that principal transactions will only occur on a limited basis, if at all.

## **Item 12: Brokerage Practices**

We describe how we select brokers for your transactions and how we determine the reasonableness of their compensation here. We disclose the conflicts of interest arising from our receipt of soft dollar benefits. We discuss whether we receive client referrals from a broker or third party, whether we require you to direct us to execute transactions through a specific broker, and if we aggregate transactions.

### Selecting/Recommending Brokers for Client Transactions

We primarily recommend that you use WSI, our affiliated broker-dealer, and First Clearing, as the qualified custodian. This presents a conflict of interest for the following reasons: (1) best execution, or our duty to seek to execute securities transactions for you in such a manner that your total cost or proceeds in each transaction is the most favorable under the circumstances, may not be achieved and (2) the trading costs may not be as favorable as those charged by other brokers. To mitigate trading cost conflicts, you will not be charged commissions on your transactions executed by WSI. This presents another conflict of interest because we will have a bias towards limiting transaction frequency in those accounts where you pay no commissions. To manage this conflict, we will monitor for decreases in the volume of trades executed by WSI to ensure that it is not because we are trying to minimize trading due to commission costs being borne by us. We also recommend Fidelity Investments (Fidelity) and TD Ameritrade (TDA) as a broker-dealer and custodian. We have agreed to pricing (including commissions and transaction account and service fees) for accounts with

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them. This is based on the nature and scope of business we do with them, including the current amount of our client assets in their custody, the types of securities we manage, and the expected frequency of our trading. They do not charge you separately for custody services but are compensated by charging you commissions or other fees on trades that they execute or that settle into your account with them. This benefits you because the overall commission rates you pay are lower than they would be otherwise.

In addition to commissions, they will charge you a flat dollar amount for each trade that we execute by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Fidelity or TDA account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have each respective broker-dealer execute trades for your account. What this means is that if you have an account with Fidelity, Fidelity will execute your transactions and if you have an account with TDA, TDA will execute your transactions. We have determined that having your respective broker-dealer execute your transactions is consistent with our duty to seek best execution of your trades. We do not require you to open an account with any of these recommended broker-dealers/custodians. You may use any broker-dealer and custodian of your choice. However, if you select your own broker-dealer, we recommend that you place your assets in a custodial relationship with a broker-dealer that has demonstrated it has an efficient and effective custodial reporting service for its clients. Your broker-dealer must also provide us access to

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download your transactions electronically and to perform trades for no additional charge.

First Clearing will hold your assets in a brokerage account and WSI will buy and sell securities when we instruct them. Fidelity and TDA will hold your assets as well as buy and sell securities when we instruct them.

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

- Capability to execute, clear, and settle trades (buy and sell securities for your account);
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds, etc.);
- Quality of services;
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices;
- Availability of investment research and tools that assist us in making investment decisions;
- Reputation, financial strength, and stability; and
- Availability of on-line access for you.

### Research and Other Soft Dollar Benefits

The term “soft dollars” refers to arrangements under which an investment adviser directs client transactions to a broker-dealer and, in exchange, obtains research products or services in addition to brokerage services from the broker-dealer. It is a means of paying a broker-dealer for its services through commission revenue, as opposed to through normal direct payments.

Generally, any trade involving a commission is a soft dollar transaction since the fee covers execution, clearance, and settlement costs. In addition, the commission covers in-house services such as broker-produced research (both proprietary and third party). In-house services for commissions are considered “bundled.” It is common practice for the broker-dealers to bundle their services. The broker-dealers we recommend bundle their services. These services provide appropriate assistance to us in our investment decision making process.

We receive a range of services and other benefits to help us conduct our business and serve you from our recommended broker-dealers. Some services will benefit you, some will not directly benefit you, and some will only benefit us.

Access to a broad range of investment products, execution of securities transactions, and custody of client assets are services that benefit you and your account. When they pay account transfer fees or other charges you pay when changing custodians or service providers, this benefits you.

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Products and services that assist us in managing and administering your accounts do not directly benefit you. They include investment research, both proprietary and third-party. We use the research to service all or a substantial number of our clients' accounts, including accounts not maintained at any of the recommended broker-dealers. In addition to investment research, they also make available software and other technology that:

- Provide access to your account data (such as duplicate trade confirmations and account statements);
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- Provide pricing and other market data;
- Facilitate payment of our fees from your accounts; and
- Assist with back-office functions, recordkeeping, and client reporting (the ability to download data files into a portfolio management system).

The following services they offer are intended to help us manage and further develop our business, which only benefits us. These include:

- Education conference and events;
- Marketing assistance
- Consulting on technology, compliance, legal, and business needs;
- Publications and conferences on practice management;

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- Access to employee benefits providers, human capital consultants, and insurance providers.

These services provided to or made available to us, are either at no fee or at a discounted price.

When we use client commissions to obtain research or other products or services, we receive a benefit because we do not have to produce or pay for the research, products, or services. We have an incentive to recommend a broker-dealer based on our interest in receiving the research or other products or services, rather than on your interest in receiving the most favorable execution.

Because the broker-dealers that we recommend bundle their services, you pay commissions (or markups or markdowns) higher than those charged by other brokers who offer pure execution services. Because we use the soft dollar benefits we receive to service any and all of our clients' accounts, we do not allocate soft dollar benefits to accounts proportionately to the soft dollar credits they generate.

#### Brokerage for Client Referrals

We do not receive any client referrals from the broker-dealers we recommend to you.

### Directed Brokerage

We do not require that you direct us to execute transactions through a specific broker-dealer. You can direct us to use a specific broker-dealer to execute your transactions. However, if you direct us to use a specific broker-dealer, you may receive a less favorable price because we would not be able to block your order with those of our other clients. We will complete other transactions before completing directed brokerage transactions so as to not adversely impact those other transactions.

### Trade Aggregation

In select circumstances, we will aggregate client orders and place them as one block with their respective broker-dealers. In the event that these block transactions are executed at different prices on the same day, you will receive an average price per share at each broker-dealer where transactions are placed for your account(s). To the extent that the trade is executed in pieces across more than one day, we will assign shares to accounts on a random basis. However, we will ensure that shares are assigned to accounts to remove any odd number of shares received and to accounts in which the entire requested position can be filled to prevent multiple commission charges.

A broker-dealer may have a policy to not charge a commission when the number of shares traded is small. We have no control over any broker-



dealer's policy to charge a commission that is less than the negotiated rate or to not charge a commission at all.

## **Item 13: Review of Accounts**

We discuss who reviews your accounts and how often they are reviewed in this section. We also describe the reports that we provide to you.

Your portfolio managers review your accounts at least quarterly to gauge the appropriateness of the securities held in relation to your needs and objectives, current investment strategies, and asset allocation. Additionally, we recommend periodic meetings with you to review your accounts, objectives and needs.

We provide you with the following written reports:

- A monthly report showing units, cost, market value, projected annual income and current yield as well as transactions which occurred in that month;
- A quarterly performance report with year-to-date performance and summary of additions, withdrawals, income and management fees deducted; and
- A quarterly information invoice showing the asset base on which our fee is calculated, the fee calculation, and the investment management fee due.

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

We describe any arrangements that we receive an economic benefit, other than from a client, for providing services and the compensation related to the arrangement in this section.

We receive an economic benefit from our recommended broker-dealers/custodians in the form of the support products and services they make available to us. These products and services, how they benefit us, and the related conflicts are described in the Brokerage Practices above. The availability to us of their products and services is not based on us giving particular investment advice, such as buying particular securities for you.

## **Item 15: Custody**

We explain here whether we have custody of your funds and securities and what you should do if we have custody.

We are deemed to have custody of your assets only because we have the ability to deduct our investment management fees from your accounts. You will receive account statements directly from your custodian at least quarterly. You should carefully review the account statements you receive from your custodian and compare them against the ones you receive from us. Comparing statements will allow you to determine whether account transactions, including deductions to pay our management fees, are accurate. There may be instances in which the statements may differ. The differences are a result of the following:

- Us not reflecting accrued interest;
- Us using a third party's price for a security;
- The rounding policy pursuant to our portfolio management system;  
and
- The reporting of market value by the custodian on a date other than  
month end.

For tax purposes, the custodial account statement is the official record because the custodian is required to provide information to the Internal Revenue Service. For calculation of management fees, our statement is the official record.

## **Item 16: Investment Discretion**

This section describes under what authority we manage your account and whether you may place any limitations on this authority.

Unless instructed otherwise, we manage your portfolio using a limited power of attorney. You grant us this authority when you sign our management agreement.

The limited power of attorney grants us the right to place trades in your account without obtaining prior permission from you. We determine which securities to buy or sell, the amount of the securities to buy or sell, and the timing of the trades. However, on occasion you may direct us to buy or sell a security. You may also place restrictions on securities you do not want bought or sold in your accounts.

## **Item 17: Voting Client Securities**

This section discusses whether we will accept authority to vote your securities, our voting policies, how we address conflicts of interest that may arise when we vote your securities, how you can direct us to vote in a particular solicitation, and how you may obtain information about how we voted your securities.

In general, we do not accept authority to vote your securities. You receive your proxies or other solicitations directly from your custodian. If you have questions about a particular solicitation, you can call or write us about them. We will provide our opinion if you wish to solicit our advice. However, we will not vote the proxy on your behalf.

An exception applies to ERISA accounts where we have a fiduciary responsibility to vote their proxies unless the plan documents state that the plan trustees will vote. For these accounts, we will vote their proxies. If in our opinion there is no valid business reason to object, we will vote according to the recommendations of the issuer.

For issues which we believe that voting as recommended by the issuer may not be appropriate, our Investment Strategy Committee will review the proxy statement along with newspaper articles, trade journals, or other information reasonably available to the public to make a decision in the plan's best interest.

We do not anticipate any conflicts of interest between the plan and us. But in the instance where such conflict of interest may arise, we will disclose it to the plan trustees in writing and solicit their instructions as to how to vote the proxy.

You may request a copy of our proxy policy and plan trustees may request a copy of the proxy votes made on the plan's behalf by submitting a written request addressed to FFSS Proxy Voting. We will respond within 10 business days of all written requests.

## **Item 18: Financial Information**

We describe in this section certain financial information about us when they are material to you. We discuss any financial condition reasonably likely to impair our ability to meet contractual commitments to you and will provide you with a copy of our audited balance sheet if we require you to prepay your fees six months or more in advance.

We have no financial conditions to report to you and we do not require prepayment of fees six months or more in advance.