

**Tanya M. Blakely**

**Other Business Activities**

Tanya M. Blakely is not currently involved in any other outside business activities.

**Additional Compensation**

Tanya M. Blakely has no additional compensation to disclose.

**Supervision**

Tanya M. Blakely is supervised by the two principals of the firm, I. Mark Cohen and Weston D. Burnett. Each Comprehensive Financial Plan or Investment Policy Statement is reviewed by those supervisors and the Client with an implementation plan that the Client reviews and approves or otherwise directs actions on. Client signatures are required for opening all accounts. She does not exercise discretionary trading authority over any Client accounts.



OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC

7601 Lewinsville Road, Suite 205

McLean, VA 22102

Ph: 703-847-0965

Fax: 703-847-8902

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

January 25, 2018

**Item 1 – Cover page**

This Brochure provides information about the qualifications and business practices of OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC. If the Clients have any questions about the contents of this Brochure, please contact us at 703-847-0965 or [wes@optifour.com](mailto:wes@optifour.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.

OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, is an SEC Registered Investment Advisory whose principal place of business is located in the Commonwealth of Virginia. Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide the Client with information from which the Client determines to hire or retain an Advisor.

Additional information about OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, is also available on the SEC’s web site at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, who are registered as Investment Advisor Representatives of OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC. Our Brochure may be requested by contacting Weston D. Burnett at 703-847-0965 or [wes@optifour.com](mailto:wes@optifour.com). Our Brochure is also available free of charge on our web site, [www.optifour.com](http://www.optifour.com). There is no charge for providing the Client a copy of an updated brochure.

Item 2 – Material Changes

The specific material changes that are made to the Brochure are primarily to report: minor corrections and updates to our assets under management.

Item 3 -Table of Contents

Item 1 – Cover Page ..... 1

Item 2 – Material Changes .....2

Item 3 – Table of Contents.....2

Item 4 – Advisory Business .....5

Item 5 – Fees and Compensation..... 7

Item 6 – Performance-Based Fees and Side-By-Side Management ..... 9

Item 7 – Types of Clients ..... 9

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss..... 9

Item 9 – Disciplinary Information..... 9

Item 10 – Other Financial Industry Activities and Affiliations..... 9

Item 11 – Code of Ethics ..... 10

Item 12 – Brokerage Practices..... 10

Item 13 – Review of Accounts..... 11

Item 14 – Client Referrals and Other Compensation..... 11

Item 15 – Custody ..... 11

Item 16 – Investment Discretion..... 11

Item 17 – Voting Client Securities..... 12

Item 18 – Financial Information ..... 12

Item 19 – Requirements for State-Registered Advisors ..... 13

Item 20 – Brochure Supplement..... 13

Ryan R. Berges

Educational Background and Business Experience

Ryan R. Berges was born August 3, 1971. His educational background includes a Bachelor’s degree from Oklahoma Christian University 1993, graduating Magna Cum Laude with a major in Speech Communications, Pre-Law and a minor in finance.

Ryan R. Berges is an Investment Advisory Representative for OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC. From 2012 to June 2013, he was a Registered Representative with FINRA Series 7 licenses with Cetera Advisors LLC. Before that, he was a licensed representative from September 2011 to 2012 for Pacific West Securities, Inc., 555 South Renton Village, Renton, Washington 98057. Mr. Berges has been employed by OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, since September 2011. From July 1993 to July 2011 he was employed by F.I.G. Financial Advisory Services, Inc. of Edmond, Oklahoma, first as a Data Management Specialist, then as Director of Operations, then as Vice President. Mr. Berges passed his FINRA Series 6 exam in 1993. His securities license was carried with Financial Network Investment Corporation from 1993 – 2003, then with Rydex Financial Services from 2003 – 2009, then with Ceros Financial Services from 2009 – 2011. Ryan passed the FINRA Series 7 General Securities exam in June 2011.

Disciplinary Information

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

Other Business Activities

Ryan R. Berges has no other business activities to disclose.

Additional Compensation

Ryan R. Berges has no additional compensation to disclose.

Supervision

Ryan R. Berges is supervised by the two principals of the firm, I. Mark Cohen and Weston D. Burnett. Each Comprehensive Financial Plan or Investment Policy Statement is reviewed by those supervisors and the Client with an implementation plan that the Client reviews and approves or otherwise directs actions on. Client signatures are required for opening all accounts. He does not exercise discretionary trading authority over any Client accounts.

Tanya M. Blakely

Educational Background and Business Experience

Tanya M. Blakely was born on January 11, 1980. Her educational background consists of a Bachelor of International Business from University of Wuerzburg in 2004.

Tanya M. Blakely is an Investment Advisory Representative for OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC. From 2004-2005, she was a Customer Satisfaction Account Manager at Bank of America in Hunt Valley, MD. She was promoted within her role to service Bank of America’s high net worth Merrill Lynch clients within the first year. This led to an opportunity to work for Merrill Lynch, in Jacksonville Florida as a Mutual Funds/Money Market Analyst from 2005-2006. She returned to Maryland the following year to begin her career at Morgan Stanley, where she helped migrate Equity CCP, ISG Operations from New York to Baltimore, and assisted in establishing two functional teams, “Fails and Booking” from 2006-2010. In 2011, she began working for her first RIA as an Investment Operations Manager for Baltimore-Washington Financial Advisors, in Columbia, MD, until January 2015.

Disciplinary Information

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

Other Business Activities

Weston D. Burnett is an attorney licensed to practice law in Virginia, Maryland and the District of Columbia. He is a managing shareholder of the law firm of Cohen & Burnett, P.C. He spends about 50% of his time at his law and tax practice. Although there is some overlap in Clientele with OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, there is no requirement that a Client of OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, engage him for legal or tax work. The law firm is kept separate from OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC. He serves as a member of the Board of Trustees of The Navy Marine Coast Guard Residence Foundation. Weston D. Burnett owns a 50% interest in Metzia Ventures, LLC, which owns office equipment and a 50% interest in REsource Partners, Group LLC.

**Additional Compensation**

Weston D. Burnett receives a salary from Cohen & Burnett, P.C.

**Supervision**

Weston D. Burnett is supervised by the other principal of the firm, I. Mark Cohen. Each Comprehensive Financial Plan or Investment Policy Statement is reviewed by those principals and any securities purchased or accounts opened are reviewed by the principals and the broker-dealer. When serving as a trustee under Cohen & Burnett, P.C., of a trust that maintains securities accounts through OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, he exercises discretionary trading authority over the trust accounts. For other Clients he may exercise, when authorized by the Client, the discretionary authority over accounts under OptiFour’s management.

**Lawrence D. Solomon, MBA, CFP®**

**Educational Background and Business Experience**

Lawrence D. Solomon was born on October 31, 1966. His education consists of a Bachelor of Arts in Economics from SUNY Albany in 1989 in Albany, New York, and a Master of Business Administration from Lehigh University in October 1992 in Bethlehem, Pennsylvania. He completed the Certified Financial Planner Professional Education Program in October 2001, passed the CFP Exam in March 2002, and has been a Certified Financial Planner® since May 2002.

Lawrence D. Solomon is an Investment Advisory Representative for OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC. From 2012 to June 2013, he was a Registered Representative with FINRA Series 7 licenses with Cetera Advisors LLC. Before that he was a licensed representative for Pacific West Securities, Inc., 555 South Renton Village, Renton, Washington 98057. From February 2006 to May 2007, he was Director of Financial and Investment Planning at Strategic Financial Associates, LLC, a Division of NYLIFE Securities and New York Life Insurance Company in Rockville, Maryland. From May 2005 to February 2006, he was the Private Wealth Advisor at Merrill Lynch Private Bank in Washington D.C. From December 2000 to May 2005, he was the Investment Research and Analysis Manager at Nationwide Financial in Columbus, Ohio. From January 1996 to December 2000, he was the Statistical Editor for The No-Load Fund Investor in Irvington, New York.

**Disciplinary Information**

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

**Other Business Activities**

Lawrence D. Solomon is a member of the GLG Financial Services Council and is a subject-matter expert on asset allocation, financial planning, investment research software, and capital markets research related to the securities industry.

**Additional Compensation**

Lawrence D. Solomon receives an honorarium of \$300 per hour for consulting services as a member of the GLG Financial Services Councils and a subject-matter expert.

**Supervision**

Lawrence D. Solomon is supervised by the two principals of the firm, I. Mark Cohen and Weston D. Burnett. Each Comprehensive Financial Plan or Investment Policy Statement is reviewed by those supervisors and the Client with an implementation plan that the Client reviews and approves or otherwise directs actions on. Client signatures are required for opening all accounts. He does not exercise discretionary trading authority over any Client accounts.

**Ryan R. Berges**

**Educational Background and Business Experience**

of Law in Williamsburg, Virginia.

I. Mark Cohen’s business background consists of a 50% ownership interest in OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, which he originally formed in September 1996 under the name Legacy Analytics, LLC, until 2008 and later Navigator Wealth Management, LLC, from 2008 to 2012. In addition, he has been a Certified Financial Planner® since January 2000. From 1998 to the present, he has been an Investment Advisory Representative for OPTIFOUR INTEGRATED WEALTH MANAGEMENT. From 1997 to the present, he has been licensed to sell insurance in the Commonwealth of Virginia. From January 1991 to the present, he has been a shareholder and principal of the law firm of Cohen & Burnett P.C., previously known as I. Mark Cohen and Associates. From March 2012 to June 2013, he was a Registered Representative with Cetera Advisors LLC. Before that he was a licensed representative for Pacific West Securities, Inc., 555 South Renton Village, Renton, Washington 98057, and before that H Beck, Inc., 11140 Rockville Pike Floor 4, Rockville, Maryland 20852. From October 1989 to December 1991, he worked for the law firm of Adams, Porter and Radigan. From January 1988 to September 1989, he worked for the CPA firm, Goodman & Company. From November 1984 to December 1987, he was a lieutenant in the Judge Advocate General’s Corps in the U.S. Navy.

**Disciplinary Information**

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

**Other Business Activities**

I. Mark Cohen is an attorney licensed to practice law in Virginia and Arizona. He is a managing shareholder of the law firm of Cohen & Burnett, P.C. He spends about 50% of his time at his law and tax practice. Although there is some overlap in Clientele with OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, there is no requirement that a Client of OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, engage him for legal or tax work. The law firm is kept separate from OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC. I. Mark Cohen owns a 50% interest in Metzia Ventures, LLC, which owns office equipment and a 50% interest in REsource Partners Group, LLC.

**Additional Compensation**

I. Mark Cohen receives a salary from Cohen & Burnett, P.C.

**Supervision**

I. Mark Cohen is supervised by the other principal of the firm, Weston D. Burnett. Each Comprehensive Financial Plan or Investment Policy Statement is reviewed by those principals and any securities purchased or accounts opened are reviewed by the principals. When serving as a trustee under Cohen & Burnett, P.C., of a trust that maintains securities accounts through OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, he exercises discretionary trading authority over the trust accounts. For other Clients he may exercise, when authorized by the Client, the discretionary authority over accounts under OptiFour’s management.

**Weston D. Burnett, J.D., LL.M, CFP®**

**Educational Background and Business Experience**

Weston D. Burnett was born February 10, 1950. His educational background consists of a Bachelor’s degree from Vanderbilt University in 1972 in Nashville, Tennessee, a Juris Doctor degree with Honors from George Washington University in 1975 in Washington, D.C., and a Master’s of Law degree with Highest Honors in International and Comparative Law from the George Washington University in Washington, DC.

Weston D. Burnett’s business background consists of a 50% ownership interest in OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, previously known as Legacy Analytics, LLC, until 2008 and Navigator Wealth Management, LLC, from 2008 to 2012. In addition, he has been a Certified Financial Planner® since September 2003. From 1975 to 2000, he was an officer in the Judge Advocate General’s Corps of the U.S. Navy. From 2001 to the present, he has been an Investment Advisory Representative (IAR) for OPTIFOUR INTEGRATED WEALTH MANAGEMENT, a Registered Investment Advisor (RIA). From July 2000 to the present, he has been a shareholder and principal of the law firm of Cohen & Burnett, P.C. From 2012 to June 2013, he was a Registered Representative with FINRA Series 7 licenses with Cetera Advisors LLC. Before that he was a licensed representative for Pacific West Securities, Inc., 555 South Renton Village, Renton, Washington 98057, and before that H Beck, Inc., 11140 Rockville Pike Floor 4, Rockville, Maryland 20852.

**Disciplinary Information**

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

**Other Business Activities**



cannot be reached for consent, they will not be included in the block trade. In the event that the client consents at a later time, they will receive a current execution price that will likely differ from the average price achieved in the block trade that was originally recommended to them.

E. Policy on Block Trading . The Firm will designate on the trade order memorandum,the number of shares of the block trade to be allocated to each specific account prior to placing the order. OptiFour will use its best efforts to make allocations on the same day. However, under no circumstances will OptiFour delay allocation so that it can allocate the more favorable prices received during the day to one account and the less favorable prices to another account.. It is OptiFour’s policy to treat all clients fairly and equally in terms of allocation of block trade results. When purchasing securities, only whole number of shares will be allocated—we will not allocate any fractional shares. When selling a security, if a client holds a fractional share of said security, only the whole number of shares will be sold as part of a block trade. Any remaining fraction will be sold separately according to the policy and procedures of the custodial firm holding the account. In the event of a partial fill of a planned block trade, OptiFour will allocate whole shares to clients in the same ratio as the ratio of proposed shares to be executed compared to the actual shares executed in the block. For example, if the block was planned to be 10,000 shares and only 5,000 shares were filled, the ratio is 50%. A client where the planned execution was 1,000 shares would be allocated 50%, or 500 shares. Clients will not be issued fractional shares in a partial fill allocation. OptiFour will round allocations where necessary to prevent the allocation of fractional shares. The Chief Compliance Officer will review all allocations of trades to ensure that OptiFour’s policies and procedures were followed and verify that no client account was systematically disadvantaged by the allocation.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, OPTIFOUR does not have any authority to, and does not, vote proxies on behalf of advisory Clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in Client portfolios. OPTIFOUR may provide advice to Clients regarding the Clients’ voting of proxies.

Item 18 – Financial Information

Registered Investment Advisors are required in this Item to provide the Client with certain financial information or disclosures about OPTIFOUR's financial condition. OPTIFOUR 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. Aside from retainers paid for a Comprehensive Financial Plan or Investment Policy Statement, OPTIFOUR does not require or receive prepayment of any fees.

Item 19 – Requirements for State-Registered Advisors

OPTIFOUR is registered with the SEC.

Item 20 – Brochure Supplement

**This Brochure Supplement provides information about I. Mark Cohen, Weston D. Burnett, Lawrence D. Solomon, Ryan Berges, and Tanya Blakely that supplements the OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, Brochure. The Client should have received a copy of that Brochure. Please contact Weston D. Burnett at 703-847-0965 or [wes@optifour.com](mailto:wes@optifour.com) if the Client did not receive OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC’s Brochure or if the Client has any questions about the contents of this supplement.**

**Additional information about I. Mark Cohen, Weston D. Burnett, Lawrence D. Solomon, Ryan Berges, and Tanya Blakely is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

I. Mark Cohen, J.D., LL.M, CFP®

Educational Background and Business Experience

I. Mark Cohen was born May 1, 1957. His educational background consists of a Bachelor’s degree from California State University in 1979 in Long, Beach California, a Juris Doctor degree from University of Arizona College of Law in 1984 in Tucson, Arizona, and a Master’s of Law degree in Tax in 1989 from the College of William & Mary Marshall Wythe School

Item 4 – Advisory Business

- A. OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, hereinafter referred to as “OPTIFOUR” or “Advisor” offers Investment Advisory services. The Principal Owners are I. Mark Cohen and Weston D. Burnett, each of whom owns 50% of the Company. From 1996 to 2008, OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, was known as LEGACY ANALYTICS, LLC and from 2008 to 2012 was known as NAVIGATOR WEALTH MANAGEMENT, LLC.
- B. The calculation of assets under management, \$319,374,353 was done as of December 31, 2017, of which \$277,415,482 was managed on a discretionary basis. OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, recommends third-party money managers that will manage an account on a discretionary basis. In select accounts where an officer of Cohen & Burnett, P.C., is both a trustee of a trust that maintains an account(s) at OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, and that officer is also an Investment Advisory Representative of OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, the officer is deemed to exercise discretion and those accounts are subject to the annual surprise audit under SEC Rule 206(4)-2.
- C. All Clients may impose restrictions on investing in certain securities or certain types of securities. All Clients have the option to purchase investment products that OPTIFOUR recommends through other broker-dealers or agents that are not affiliated with OPTIFOUR.
- D. OPTIFOUR has four general categories of Investment Clients:
  - 1. Full-Service Clients
    - a. Comprehensive Financial Plan
    - b. Investment Policy Statement
  - 2. Investment-Services-Only Clients
  - 3. Financial-Planning-Only Clients
  - 4. Accommodation Services Clients
  - 5. Trustee Services Clients

E. Full-Service Clients

For Full-Service Clients, Advisor provides a Comprehensive Financial Plan and Ongoing Investment Advisory Services to its Clients. Alternatively, a Client may also choose an Investment Policy Statement in lieu of a Comprehensive Financial Plan. Advisor analyzes the Client's economic position, constraints and goals, and recommends financial strategies that sometimes include the repositioning of investments when Advisor believes it is in the best interest of the Client. The minimum assets under management for a new Full-Service Client is normally \$700,000.

- 1. Comprehensive Financial Plan. OPTIFOUR studies and analyzes the Client’s overall financial situation, including income, cash flow and expenses, investments, insurance, estate planning, risk management, debts, liquidity, taxes, health, debt, family obligations, charity, gifting, retirement, values, goals, objectives, and time horizon. The analysis will result in a set of recommended strategies spanning the above considerations (together with Advisor’s ranking of those strategies) allowing the Client to choose what to implement and with which investment firm(s). The result is a portfolio recommendation that has been statistically modeled using Monte Carlo simulation and other techniques to best accomplish the Client’s financial and life goals.
- 2. Investment Policy Statement. Investment Policy Statement includes a review of current portfolio holdings, asset allocation, and historical performance of the current investments and their corresponding asset classes and investment recommendations going forward. The analysis may also include a range of possible investment allocations based on the Client’s risk tolerance and objectives with forecasted risk and return metrics for each scenario. The Client directs how OPTIFOUR is to implement the recommended allocations. The Investment Policy Statement does not include Monte Carlo simulations or other techniques to assess the probability of success or the feasibility of the Client’s goals going forward.
- 3. Ongoing Investment Advisory Services. OPTIFOUR will, on a continuing and/or periodic basis, advise the Client regarding the purchase and sale of securities. Advisor is available to the Client for consultation concerning analyses performed by OPTIFOUR and the investment portfolios that OPTIFOUR manages on the Client’s behalf. In addition, OPTIFOUR provides:

- a. Periodic reports regarding the investment portfolios that we manage on the Client’s behalf, summarizing their values, transactions, and performance, annually and quarterly;
    - b. Reviews of the performance of the Client’s investment portfolios that we manage on the Client’s behalf, at the Client’s request. (OPTIFOUR recommends updates of the Client’s financial plan as the Client’s life circumstances change and currently charges up to \$5,000 for that service);
    - c. Seminars and other opportunities for the Client to learn about changes in the economy, tax law, investments, and other public information that might affect the Client’s financial situation;
    - d. Information on changes in tax regulations and other laws that can significantly impact the Client’s financial position and investment strategy; and
    - e. Consultation on specific issues not falling within the purview of the above.
  4. Our advice, as part of this engagement, is not to be construed as legal, tax, or accounting advice. OPTIFOUR does not prepare legal, tax, or accounting documents. Nevertheless, if the Client chooses to retain the law firm of Cohen & Burnett, P.C., to prepare the Client’s federal and state income tax returns and to periodically update the Client’s existing estate planning legal documents, OPTIFOUR will pay \$2,400 each calendar year to Cohen & Burnett, P.C., for such engagement at no additional cost to the Client, provided the Client remains in good standing with OPTIFOUR throughout the period to which the legal engagement applies. If the Client’s legal or tax fees exceed that amount, the Client will be advised of that fact in order to enter into a separate billing arrangement with Cohen & Burnett, P.C.
  5. Termination:
    - a. Five-Day Right-to-Cancel. If within five (5) business days from the date of the Client’s signed agreement with OPTIFOUR, either the Client or OPTIFOUR, for any reason, with or without cause, wish to terminate the Agreement, the Client (or OPTIFOUR) may do so unilaterally, in writing, and OPTIFOUR will fully refund any compensation paid relative to services provided under this Agreement.
    - b. Thirty-Days’ Notice. Thereafter, the agreement may not be terminated unilaterally by either party for one-year from the date of execution of the Agreement. Any time after that one-year period, the Agreement may be terminated by either party upon thirty (30) days’ written notice by certified or registered mail to the last known address of the other party. OPTIFOUR will retain all commissions received without rebate or refund and will retain all fees paid for services already rendered. OPTIFOUR will bill the Client for services rendered up through the expiration of the 30-days’ notice. The Client will be responsible for making arrangements to move the Client’s accounts within the 30-day-termination period to the Client’s new advisor or brokerage firm. The Client must either move all the Client’s accounts away from OPTIFOUR or switch them to non-fiduciary accounts with each custodian within the 30-day-termination period. Otherwise, the termination letter will be deemed revoked and this agreement will reinstate as if it was never terminated.
    - c. No Refund. No refund will be made of compensation paid as a result of the implementation of recommendations by OPTIFOUR, our employees, agents or representatives, or affiliated employees, except as required by law or regulation.
- F. Investment-Services-Only Clients
1. Investment-Services-Only Clients engage OPTIFOUR to provide them with investment advice for select investment holdings only. The Client directs how OPTIFOUR is to maintain the portfolio allocations.
  2. Ongoing Investment Advisory Services. OPTIFOUR agrees to be available to the Client for consultation concerning the Client’s investment portfolios:
    - a. Annual reviews of the performance of the Client’s investment accounts that OPTIFOUR assisted the Client in investing;
    - b. Special reviews upon the Client’s request billed at an hourly rate for the time OPTIFOUR spends according to our hourly rate schedule then in effect;
    - c. Seminars and other opportunities for the Client to learn about changes in the economy, tax law, investments, and other public information that might affect the Client’s financial situation; and
    - d. OPTIFOUR is not responsible for any legal or tax services.
  3. Termination:
    - a. Five-Day Right-to-Cancel. If within five (5) business days from the date of the Client’s signed agreement with OPTIFOUR, either the Client or OPTIFOUR, for any reason, with or without cause, wish to terminate the Agreement, the Client (or OPTIFOUR) may do so unilaterally, in writing, and

## Item 15 – Custody

- A. Clients receive at least quarterly statements from Fidelity, Schwab, banks or other qualified custodians that hold and maintain Client’s investment assets. OPTIFOUR urges Clients to carefully review such statements and compare such official custodial records to the account statements that OPTIFOUR may provide to the Client. Statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.
- B. OPTIFOUR does not have custody of any Client assets generally, with one exception being that Clients have directed OPTIFOUR to deduct its quarterly fees from their investment accounts as documented in the quarterly report sent to Clients. In a small number of cases, an officer of the law firm of Cohen & Burnett, P.C., a related company to OPTIFOUR, serves as trustee of securities accounts maintained by OPTIFOUR. In those instances, OPTIFOUR is deemed to have custody of the funds since the trustee has signature authority over the securities accounts maintained by OPTIFOUR. Such accounts are subject to the SEC annual surprise audit requirements under SEC Rule 206(4)-2.

## Item 16 – Investment Discretion

- A. OPTIFOUR recommends that Clients authorize the active discretionary management of a portion of their assets by and/or among certain independent investment managers (“Independent Managers”), based on the stated investment objectives of the Client. The terms and conditions under which the Client engages the Independent Managers are set forth in a separate written agreement between OPTIFOUR or the Client and the designated Independent Managers. OPTIFOUR renders services to the Client relative to the discretionary selection of Independent Managers. OPTIFOUR also monitors and reviews the account performance and the Client’s investment objectives. When selecting an Independent Manager for a Client, OPTIFOUR reviews information about the Independent Manager such as its disclosure brochure and other material supplied by the Independent Manager or independent third parties for a description of the Independent Manager’s investment strategies, past performance and risk results to the extent available. Factors that OPTIFOUR considers in recommending an Independent Manager include the Client’s stated investment objectives, management style, performance, reputation, financial strength, reporting, pricing and research.
- B. Starting in 2016, clients are requested to authorize OptiFour Integrated Wealth Management, LLC, to provide discretionary investment advisory services in their assets under their management. Discretionary authority is defined as having the authority to determine the type of securities and the amount of securities that can be bought or sold in client accounts without obtaining the client’s consent for each transaction. In all cases, Optifour will exercise discretionary authority in a manner consistent with each client’s risk tolerance, time horizon, and investment objectives. OPTIFOUR and its OPTIFOUR-related persons do not have authority to determine, without obtaining specific Client consent, the broker-dealer used for securities bought or sold or commission rates paid. However, OPTIFOUR places neither conditions nor restrictions on the Client’s choice of broker-dealer.
- C. Client investment guidelines and restrictions must be provided to OPTIFOUR, in writing.
- D. Block Trading - Policy on Block Trading: OptiFour will:
  1. Disclose its block trading policies in its disclosure documents;
  2. Provide notice to the client(s) of the fact that they may be subject to block trades;
  3. Ensure that each client will be treated fairly and will not favor any client over another; and
  4. Ensure that the decision to aggregate a trade for a client is based on individual advice to that client. OptiFour will place block trades for transactions of certain intra-day priced securities such as stocks and ETFs, where appropriate, when looking to buy or sell the same security across a group consisting of more than one client. The purpose of the block trade is to provide equal treatment of all clients involved in terms of price received or paid for the block-traded security. As risk tolerance and goals vary from client to client, there may be circumstances where a particular security is traded at different times based on client risk level. Blocks may be built and grouped by particular client risk level, or they may be built across all accounts, as appropriate. OptiFour has two primary custodial relationships for brokerage clearing. When blocks are built they will be built and submitted to each custodian separately for execution. While OptiFour will make all attempts possible to minimize differences in execution prices between custodians, there exists a likelihood that average execution price on one custodial platform may differ from the average execution price on another platform. Clients will receive the average execution price for a block trade completed on the custodial platform where their particular account is held. There is a possibility that a client may have accounts on both of these custodial platforms, and in such a case each account will be part of the block trade specific to that account’s platform. While OptiFour has discretionary trading authority on most client accounts, clients do have the opportunity to opt out of giving such discretionary authority. If a client has refused or revoked discretionary trading authority, they will be contacted with our recommendation before a block trade is placed. If they consent to the trade they will be included with the block trade along with all other accounts affected. If they do not consent, or if they

Item 11 – Code of Ethics

- A. OPTIFOUR, as RIA, and all Investment Advisory Representatives (IARs) of the firm, are fiduciaries and have the responsibility to provide professional judgment, ongoing and unbiased investment advice, and proper care when dealing with their Clients. As fiduciaries, OPTIFOUR and its IARs, recognize that their Clients deserve a duty of honesty and fair dealing and that their interests come first. OPTIFOUR and its IARs must at all times put the best interests of the Clients ahead of their own interests; in all personal securities transactions, any actual or potential conflicts of interest must be avoided. At all times, the Advisor’s position of trust and responsibility must not be abused. Information concerning a Client’s security holdings, financial characteristics and personal information, is confidential and will be protected and guarded. IARs will not take inappropriate advantage of their positions.
- B. OPTIFOUR 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 conflicts of interest, 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 OPTIFOUR must acknowledge the terms of the Code of Ethics annually, or as amended. Adherence to this Code is a condition of each employee’s employment. A copy of our Code of Ethics is available upon request by any Client, by requesting it from Weston D. Burnett.
- C. OPTIFOUR will not affect any principal or agency cross-securities transactions for Client accounts. OPTIFOUR will also not do cross trades between Client accounts.

Item 12 – Brokerage Practices

- A. For equity and other securities transactions, commissions may be charged that are higher or lower than those charged at other custodians. OPTIFOUR does not receive referrals from any custodian. All Clients have the option to purchase investment products that OPTIFOUR recommends through other custodians or agents that are not affiliated with OPTIFOUR.
- C. With respect to specific securities, OPTIFOUR’s due diligence process may include visits to the fund managers’ offices, or other meetings to check or review the investments. Such visits, if they involve travel, may include payments by the sponsor of the investment product for travel, lodging and meals for such a visit.
- D. Client accounts are typically custodied at Schwab Institutional or Fidelity. Schwab Institutional and Fidelity provide access to their Institutional RIA platforms which are called Schwab Advisor Center and Fidelity WealthScape, respectively. Further, they provide OPTIFOUR with duplicate confirmations and statements. OPTIFOUR has no soft dollar arrangements with any firm. Fidelity and Schwab Institutional may on occasion host events to which members of OPTIFOUR may be invited for information purposes. On occasion, OPTIFOUR has hosted Client gatherings. Fidelity and Schwab Institutional may be asked to help pay for the bill to vendors that arises out of the gathering. Typically, that cost has not been more than about \$5,000 per firm.

Item 13 – Review of Accounts

- A. Client reviews are suggested and performed by OPTIFOUR on a periodic basis, typically annually. Clients may request other reviews as their personal circumstances dictate. The suggestion for review is triggered by the firm’s annual review letter, economic and life changes for the Client, or by Client request. Reviews include examinations of Client’s financial situation and are conducted by the analytical staff of OPTIFOUR and reviewed by Weston D. Burnett or I. Mark Cohen.
- B. Advisor provides Clients with on-line access to certain information on their investment account records as provided and maintained by various investment providers. Clients receive quarterly reports from Advisor and/or associated companies involved with investing OPTIFOUR Client assets. Reports generated by OPTIFOUR are based on information gathered from both the investment sources and the Clients.

Item 14 – Client Referrals and Other Compensation

OPTIFOUR has not entered into an agreement with any broker dealer on client referrals or other compensation.

OPTIFOUR will fully refund any compensation paid relative to services provided under this Agreement.

- b. Thirty Days’ Notice. After the five-day right-to-cancel, the agreement may not be terminated unilaterally by either party for one year from the date of execution of the Agreement. Any time after that one-year period, the Agreement may be terminated by either party upon thirty (30) days’ written notice by certified or registered mail to the last known address of the other party. OPTIFOUR will retain all commissions received without rebate or refund and will retain all fees paid for services already rendered. OPTIFOUR will bill the Client for services rendered up through the expiration of the 30-days’ notice. The Client will be responsible for making arrangements to move the Client’s accounts within the 30-day-termination period to the Client’s new advisor or brokerage firm. The Client must either move all the Client’s accounts away from OptiFour or switch them to non-fiduciary accounts with each custodian, within the 30-day-termination period. Otherwise the termination letter will be deemed revoked and this agreement will reinstate as if it was never terminated.
  - c. No Refund. No refund will be made of compensation paid as a result of the implementation of recommendations by OPTIFOUR, our employees, agents or representatives, or affiliated employees, except as required by law or regulation.
- G. Financial-Planning-Only Clients. Clients may seek only to have a financial plan.
- H. Accommodation-Services Clients.  
In rare cases OPTIFOUR may have a Client who does not seek full-service, investment-services or financial-planning services. They may seek only to have a securities account as an accommodation with OPTIFOUR, in which essential services are provided to the client upon request but no investment advisory services.
- I. Trustee-Services Clients.  
In rare cases OPTIFOUR may enter into an agreement with Trustee(s) of Cohen & Burnett, P.C. to provide investment advisory services.

Item 5 – Fees and Compensation

OPTIFOUR INTEGRATED WEALTH MANAGEMENT, LLC, offers advisory services for (1) a percentage of assets under management for most Clients, (2) in select cases on an hourly basis, (3) fixed fees for financial plans. and (4) as trustee.

- A. Full-Service Client Fees
  - 1. Comprehensive Financial Plan: Flat Fee \$7,500 (N.B. fee is \$5,000 for accounts in excess of \$3 million, and waived altogether for accounts in excess of \$4 million).
  - 2. Investment Policy Statement: Flat Fee \$2,500.
  - 3. Ongoing Investment Advisory Services:
    - a. 1.5% of the First \$1,000,000. 1.5% of the assets under advisement or administration on an annualized basis up to the first \$1,000,000 of the account’s Net Asset Value (minimum fee of \$833 per month).
    - b. 1% of Assets in Excess of \$1,000,000. 1% of assets under advisement or administration on an annualized basis for amounts in excess of \$1,000,000 of the account’s Net Asset Value (maximum fee may be capped at \$100,000).
    - c. Fees Paid Quarterly. Fees are to be paid quarterly (on a calendar quarter basis) in arrears. If the management of the account commences at any time other than the beginning of a calendar quarter, the first quarterly fee shall be prorated from the date of the execution of the Investment Advisory agreement to the end of the quarter and will be based on the Net Asset Value at the end of the quarter.
    - d. Assets Under Advisement or Administration. Assets under advisement or administration include all monies or securities that the firm is providing advice on with respect to investment strategy, reporting on tax returns, or reporting on valuations and performance, regardless of custody, including stocks and bonds, mutual funds, IRA’s, Thrift Savings Plans, 401K’s, 403B’s, 457’s, deferred compensation plans, qualified and nonqualified stock options and restricted stock plans, cash balance plans, fixed, variable and equity indexed annuities, cash management options, nonqualified mutual fund accounts, cash value of life insurance, and any alternative investments or direct placements. Net Asset Value of the account shall be determined by OPTIFOUR in good faith at the close of the New York Stock Exchange on the last business day of each quarter.



Assets under advisement or administration do not include the Client’s personal checking and savings accounts, personal residence or other rented properties, and, any other assets excluded under the terms of the Client agreement with OPTIFOUR.

- e. Valuation of Hard-to-Value Investments. Investments that are not publicly traded generally lack a liquid market and the value of such Alternative Investments may be difficult to ascertain. OPTIFOUR uses its best efforts to value such assets as follows:

- 1) If the Investment is valued by a third-party custodian, OPTIFOUR will use that value.
- 2) If a valuation is not obtainable through a third-party custodian, OPTIFOUR will request a valuation from the general partner, manager, or issuer in a form and manner acceptable to OPTIFOUR.
- 3) If a timely and reliable valuation is not obtainable by the above means, OPTIFOUR will use the previous quarter’s valuation. If a timely and reliable third-party valuation remains unobtainable, OPTIFOUR will use its best efforts to value the asset using the following methods in order: (i) industry standard valuation formulas; (ii) the cash-out price offered (if any) in the prospectus; or (iii) the purchase price.
- 4) A third-party custodian, the general partner, manager, or issuer may only update valuations annually.
- 5) For an IRA account, the third-party custodians may be required to value the Alternative Investments before a distribution from such Account and that such valuation may delay any requested distributions from the Client’s Account, including Required Minimum Distributions (RMD).
- 6) In selected cases, the fee for a direct placement may be a flat fixed fee.

4. The specific manner in which fees are charged by OPTIFOUR is established in a Client’s written agreement with OPTIFOUR. OPTIFOUR will generally bill its fees on a quarterly basis in arrears after each calendar quarter. Clients may also be billed directly for fees or authorize OPTIFOUR to directly debit fees from Client accounts. Fees are generally calculated based on the balance on the last day of the calendar quarter. Management fees shall not be prorated for each capital contribution and withdrawal made during the applicable calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any earned, unpaid fees will be due and payable. All fees are subject to negotiation.
5. Householding: When more than one generation of a family (parent, child, grandchild) desires to enter into a Financial Advisory and Planning Services Agreement with OptiFour, the primary family member can sign an OptiFour Financial Advisory and Planning Services Agreement to be billed the standard 1.5% (or minimum of \$2500 per quarter or \$10,000 per year) on the first \$1,000,000 and 1% of any excess over \$1,000,000. The assets under management of OptiFour of any other member of a younger or older generation of the same family shall be billed at a fee of 1% on their assets, if OptiFour and the family members agree. The actual bill shall be paid from accounts as mutually agreed upon by the family members and OptiFour.

B. Investment-Services-Only Client Fees

1. 1% of Assets Invested through OPTIFOUR. 1% of assets under advisement or administration on an annualized basis of the account’s Net Asset Value (maximum fee may be capped at \$100,000).
2. In selected cases, the fees may be fixed as a specific dollar amount per year rather than a fee that is based on a percentage of assets invested through OPTIFOUR.
3. Fees Paid Quarterly. Fees are paid from inception of the investment account on a quarterly basis in arrears to OPTIFOUR.

C. Financial-Planning-Only Client Fees. Flat Fee of \$12,500.

D. Accommodation-Services Client Fees. No charge for advisory services as none are provided.

E. Trustee-Services Client Fees. 1% of Assets, except as otherwise agreed

F. OPTIFOUR’s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses, which may be incurred by the Client. Clients may incur certain charges imposed by custodians, broker-dealer, third-party investments and other third parties, such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange-traded funds also charge internal management

fees, which are disclosed in a fund’s prospectus. Such charges, fees and commissions are exclusive of, and in addition to, OPTIFOUR’s fee.

- G. Item 12 further describes the factors that OPTIFOUR considers in selecting or recommending broker-dealers for Client transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

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

OPTIFOUR 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).

## Item 7 – Types of Clients

OPTIFOUR provides portfolio management services to high-net worth individuals, pension and profit-sharing plans, trusts and estates. For full-service Clients, the minimum amount charged per year for the service is \$10,000, or \$833 per month. Exceptions to this rule have been made on occasion.

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

- A. Investing in securities involves risk of loss that Clients should be prepared to bear.
- B. OPTIFOUR employs a due diligence process driven by original research based on our qualitative and quantitative investment selection and monitoring criteria outlined in our Firm-wide Investment Policy. Investments are vetted through a formal due diligence process via OPTIFOUR’s Investment Committee, which meets quarterly. OPTIFOUR uses on-site due diligence meetings, conference calls and webinars, business and industry publications, third-party research, corporate rating services, annual reports, prospectuses, SEC filings, and financial software such as Morningstar, Orion, eMoney, Lipper, and other sources to conduct our investment research. OPTIFOUR also uses outside statistical data to compose portfolios that attempt to maximize return at a given level of risk.
- C. Types of securities that OPTIFOUR has dealt with, and advised Clients on, include domestic and foreign equities, warrants, US Government securities, corporate debt securities, certificates of deposit, municipal securities, mutual funds, exchange-traded funds, separately managed accounts, options, and, in the past, but no longer, public and private direct placements. Each of these securities has varying risks and types of potential loss. For many of the alternative investments, the risks are set forth in greater detail in the prospectus pertaining to the security.

## Item 9 – Disciplinary Information

Registered Investment Advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to The Client’s evaluation of OPTIFOUR or the integrity of OPTIFOUR’s management. OPTIFOUR has no information applicable to this Item.

## Item 10 – Other Financial Industry Activities and Affiliations

- A. Advisory Firms. OPTIFOUR has not established advisory arrangements that include fee sharing with any other investment advisory firms. Neither OPTIFOUR nor any related person is a general partner in any partnership in which Clients are solicited to invest.
- C. Insurance. I. Mark Cohen is licensed to sell life insurance, annuities, title insurance and health insurance by the Commonwealth of Virginia.
- D. Cohen & Burnett, P.C. I. Mark Cohen and Weston D. Burnett are licensed attorneys who own Cohen & Burnett, P.C. OPTIFOUR’s advice, as part of any Client engagement, is not construed as legal or accounting advice. Nor will OPTIFOUR prepare any legal or accounting documents.
- E. Lessons to My Children. I. Mark Cohen and Weston D. Burnett authored a book in 2010 entitled “Lessons to My Children: Simple Life Lessons for Financial Success, Wealth and Abundance.” They have a web site, [www.lessonstomychildren.com](http://www.lessonstomychildren.com), and have been interviewed about the book on television and radio, and by book reviewers or other writers.
- F. Metzia Ventures. I. Mark Cohen and Weston D. Burnett own Metzia Ventures, LLC, which owns the office equipment that is used by Cohen & Burnett PC and OptiFour Integrated Wealth Management, LLC and also owns a 50% interest in Resource Group Partners, LLC, a title insurance company.