



ADV PART 2 A.

ITEM 1. – COVER PAGE

Date: March 6, 2019

SEC File Number:801-110058

Investment Advisor:

Wealthstreet Investment Advisors, LLC

Business Address:

1445 Ross Avenue, Suite 5600
Dallas, TX 75202

Phone:

214-954-1900

Business Hours:

Monday – Thursday, 7:30 a.m. – 4:30 p.m.CST
Friday, 7:30 a.m. – 4:00 p.m.CST

Website Addresses:

www.wealthstreet-advisors.com

** This brochure provides information about the qualifications and business practices of Wealthstreet Investment Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at 214-954-1900 or Lynette Heil, Chief Compliance Officer at lynetteheil@wealthstreet-advisors.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.

Any reference to or use of the terms “registered investment adviser” or “registered,” does not imply that Wealthstreet Investment Advisors, LLC, or any person associated with Wealthstreet Investment Advisors, LLC, has achieved a certain level of skill or training.

Additional information about Wealthstreet Investment Advisors, LLC, is available on the SEC’s website at www.adviserinfo.sec.gov.

ITEM 2. – MATERIAL CHANGES

The purpose of this page is to inform you of material changes since the previous annual update to our brochure, dated March, 2018. If you are receiving this brochure for the first time, this section may not be relevant to you.

Below is a summary of the material changes made to our brochure since the previous annual update:

We now also provide advisory services under a sub-advisory agreement with an unaffiliated third party adviser. Under the agreement we offer discretionary management of accounts (“Custom Accounts”) in our investment strategies, and may also provide non-discretionary management of model accounts (“Model Accounts”) comprised of ETFs. The adviser directs the custodian and broker under the agreement. Wealthstreet reviews accounts at least quarterly and the adviser is responsible for sending reports to the client. The adviser retains authority for voting proxies in sub-advised accounts. For additional details, please see Items 4, 5, 12, 13, 16, and 17.

ITEM 3. – TABLE OF CONTENTS

ITEM 1. – COVER PAGE	1
ITEM 2. – MATERIAL CHANGES	2
ITEM 3. – TABLE OF CONTENTS	3
ITEM 4. – ADVISORY BUSINESS	4
ITEM 5. – FEES AND COMPENSATION	9
ITEM 6. – PERFORMANCE BASED FEES AND SIDE-BY-SIDE MANAGEMENT	11
ITEM 7. – TYPES OF CLIENTS	12
ITEM 8. – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS	13
ITEM 9. – DISCIPLINARY INFORMATION	17
ITEM 10. – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS	19
ITEM 11. – CODE OF ETHICS	20
ITEM 12. – BROKERAGE PRACTICES	21
ITEM 13. – REVIEW OF ACCOUNTS	28
ITEM 14. – CLIENT REFERRALS AND OTHER COMPENSATION	30
ITEM 15. – CUSTODY	32
ITEM 16. – INVESTMENT DISCRETION	34
ITEM 17. – VOTING CLIENT SECURITIES	35
ITEM 18. – FINANCIAL INFORMATION	37

ITEM 4. – ADVISORY BUSINESS

A. ADVISORY FIRM AND OWNERSHIP:

Effective June 28, 2017, Wealthstreet Investment Advisors, LLC (“Wealthstreet”), having combined its business with Gerald L. Ray & Associates, Ltd. (“GLR”), has reorganized and its current principal owners are as follows: GLR, 46%; Michael Beck, 21%; and Michael Kane, 23%.

B. TYPES OF ADVISORY SERVICES OFFERED:

We offer investment advisory services as well as bookkeeping and tax services. Wealthstreet may offer financial planning services to clients as part of our overall advisory services. Wealthstreet may receive separate compensation for financial planning related services. A financial plan may include a net worth statement, a cash flow analysis, and a review of existing investments and/or retirement assets, investment recommendations, strategic tax planning, estate planning recommendations or education planning. Services do not include the preparation of any legal documents. Implementation of the recommendations is at the client’s discretion. Less than 5% of total employee time is spent providing these additional services.

The minimum dollar market value of assets required to open and/or maintain an investment advisory account is \$500,000. Consideration is also given to lesser-valued accounts.

SPECIALIZATION:

Our firm offers advisory services to individuals, foundations, 401(k) plans, pension and profit-sharing plans, trust, estates, charitable organizations, corporations, and other types of business entities. We offer advice on exchange-listed securities, securities traded over-the-counter, foreign issuers, United States government securities, warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, options on securities, real estate partnerships, and mutual fund shares.

We do not manage accounts for government entities or pooled investments.

We are investors not traders. Our process is client driven, allowing our expert portfolio managers to provide clients with advice and asset management skills needed to make the most of their investments. It is our job to look at opportunities created in public markets and work with our clients to build custom portfolios

consistent with their need for liquidity, and their comfort level for risk, as well as other considerations. We begin our engagement by identifying our client's financial needs and objectives. We then determine an appropriate allocation strategy and create a customized portfolio. Ongoing reviews and assessments are necessary to ensure that investment strategies remain consistent with the individual needs and objectives of our clients.

Our investment strategy seeks to maximize client gains while focusing on minimizing the risk involved, within the parameters of our client's personal tolerance. We maintain a long-term approach designed for growth and income. Over time, our strategy has evolved as new investment vehicles have allowed for greater diversification and for global reach. In a small percentage of accounts, we may use model portfolios. We work closely with clients to create a custom portfolio using traditional stock and bond investments along with Exchange-Traded Funds (ETFs) and other yield vehicles such as Real Estate Investment Trusts (REITs) and Master Limited Partnerships (MLPs). As part of our strategy, all taxable accounts are actively managed to reduce or neutralize taxes when appropriate.

Equity Strategy

The foundation of our equity strategy focuses on companies that grow faster than the economy as a whole. Stock portfolios typically hold 25-50 securities and have low turnover meaning that the number of buys and sells per year is very low. While each portfolio manager has his area of expertise, investment ideas are shared among the entire Investment Team allowing us to select from a diverse range of stocks. These portfolios generally contain the following types of equities:

- **Large-Cap Growth** - High quality, large capitalization growth companies with favorable profit histories and reasonable valuations
- **Mid-Cap Leaders** - Mid-capitalization industry leader companies with reasonable valuations that thrive in a particular niche
- **Turnaround Opportunities** - Fallen growth companies that are considered to be in the process of reviving their growth history
- **Solid dividend payers who offer value:** these companies could benefit from internal or external economic improvement
- **Exchange-Traded Funds (ETFs)** may also be used to broadly increase exposure to certain sectors, industries, or geographies. For example, in certain portfolios we use ETFs to access international markets, small cap companies, and certain industries.

Fixed Income Strategy

Our bond strategy includes purchasing debt securities of short to intermediate maturities and generally holding them to maturity. The use of fixed income

instruments enhances current income and stability and provides diversity in asset allocation. We may also utilize fixed income-based ETFs, both U.S and international, as well as other yield vehicles, like Real Estate Investment Trusts (REITs), and Master Limited Partnerships (MLPs) to increase income while attempting to reduce volatility.

As part of our investment strategy, all taxable accounts are actively managed to reduce or neutralize taxes.

Alternatives Strategy

We may use liquid alternatives for diversification in an effort to provide stability to portfolios and protect against downside moves in traditional stock and bond markets. An alternative investment, loosely defined is an investment in any asset other than long-only stocks or bonds. Alternative investments have long been the realm of hedge funds but we access these strategies through mutual funds and exchange traded funds (ETFs). We use mutual funds and ETFs rather than hedge funds for these reasons:

- Superior liquidity
- Lower fees
- Low initial investments requirements
- Greater transparency

Strategies that might be utilized include, but are not limited to:

Long-short equity: Funds that concentrate on equity securities and derivatives and combine long positions with short bets achieved through ETFs, options, or plain-old short stock positions. The balance of short to long positions will depend on the fund's macro outlook.

Market neutral: Funds that seek to minimize systematic risks born of overexposure to specific sectors, countries, currencies, etc. They aim to match short positions and long positions within these areas and achieve low beta.

Non-traditional Bond: This strategy takes unconventional approaches to bond investing, often trying to achieve returns that are uncorrelated with the bond market. "Unconstrained" funds invest with a high degree of flexibility, taking positions in high-yield foreign debt, for example.

Managed Futures: These funds invest primarily through derivatives, including listed and over-the-counter futures, options, swaps and foreign exchange contracts. Most use momentum approaches, while others follow mean-reversion or other strategies.

Multi-alternative: These funds combine different alternative strategies, such as those listed above. They may have fixed allocations to set strategies, or vary their approaches depending on market developments.

401(k) Plans

We also manage 401(k) plans which utilize a third party administrator's ("TPA") services.

The TPA

- is an independent provider for recordkeeping and administrative services for 401(k) and other defined contribution plans
- provides sponsors and clients with key tools and resources
- provides a user-friendly platform

We use model portfolios. Participants enroll online on the TPA's website. Clients select individual ETFs or one of the model portfolios, Participants can change investment selections at any time.

We are not charged a fee to participate with the TPA on this platform.

401(k) plan clients must use an independent provider of recordkeeping and administrative services. The plan should hire the third-party administrator and we will provide investment choices using ETF model portfolios and individual ETFs.

Portfolio Supervision

We offer portfolio supervision services on a non-discretionary basis. We will monitor, on an ongoing basis, the third-party investment managers selected by the client for the management of the client's assets. We will provide periodic recommendations to the client.

Sub-Advisory Relationships

Clients can also access our investment management services through unaffiliated third parties under a sub-advisory relationship. Under the agreement we offer management of accounts ("Custom Accounts") in our investment strategies, as described above and below under *Item 8 - Methods of Analysis, Investment Strategies, and Risk of Loss*. We may also provide model accounts ("Model Accounts") comprised of ETFs for implementation by the adviser and which are non-discretionary to Wealthstreet.

C. CLIENT RESTRICTIONS

We tailor our advisory services to your individual needs. As part of our information gathering process, we ask if there are any restrictions on investing in certain securities or types of securities. We note restrictions and adhere to them.

D. WRAP FEE

Our firm does not participate in a Wrap Fee Program.

E. ASSETS UNDER MANAGEMENT:

Wealthstreet manages client assets in both discretionary and non-discretionary accounts on a continuous and regular basis. As of December 31, 2018, the total amount of assets under our management was:

Discretionary Assets	\$814,562,319
Non-Discretionary Assets	\$ 1,921,478
Total Assets	\$816,483,797

ITEM 5. – FEES AND COMPENSATION

A. Our firm charges fees for advisory services on a fixed fee basis or as an annual percentage of assets under management. Fees are calculated on the Market Value of assets under management at the end of each quarter.

- The Standard Fee Schedule is:

1.00% of the First \$5 Million
0.75% of the Next \$5 Million
0.50% of the Residual
1.25% if the balance is under \$500,000

- Fees are negotiable.
- Fees for Portfolio Supervision clients: fees are negotiable.

In specific circumstances as referenced in “Item 15-Custody”, Wealthstreet may be deemed to have custody of client assets and be required to have a surprise custody audit by an independent public accountant. Clients for whom Wealthstreet is subject to a surprise custody audit will be charged a set fee each quarter to help defray the cost of the audit and for the additional services for which Wealthstreet is deemed to have custody of client assets.

Fees are billed in arrears within 30 days following the end of each calendar quarter. All invoices are payable upon receipt.

Special fee consideration is given to employees and family members.

We charge management fees for mutual funds and exchange-traded funds which are in addition to other fees and expenses charged by investment companies.

Our services may be terminated. A final invoice is sent within 30 days of receiving written notice of termination. Fees are charged for the final period under management through the termination date.

Sub-Advisory Relationships

For Custom Accounts and Model Accounts, Wealthstreet receives an advisory fee according to the fee schedule disclosed to clients by the adviser and agreed to by the client in the client agreement. The fee is payable quarterly in arrears and is calculated based on the ending market value of each account’s assets managed by Wealthstreet at the end of each calendar quarter.

Clients using us as a sub-adviser through third party advisers may terminate our management services per the terms in their agreement with the adviser. In the event the agreement for services is terminated by a client prior to the end of a quarter, the fee for the account will be prorated as of the date of termination.

B. Clients select a preferred method for payment of fees. You can

- have your advisory fees paid directly from your brokerage account. You must sign broker documents which give us authority to submit invoices for investment advisory services directly to your broker for payment from your account. You will receive a copy of your invoice with a notation that your fee has been deducted from your specific brokerage account.
- pay by check upon receipt of the invoice

Sub-Advisory Relationships

For Custom Accounts, Wealthstreet will bill each account directly, including any pro-rata fees, by directly debiting your brokerage account. For Model Accounts, adviser pays Wealthstreet its fee including any pro-rata fees.

- C. You may incur other fees in addition to investment advisory fees. They are bank and broker custodian fees and transaction costs. See item 12. Brokerage Practices for more information concerning other fees. For Portfolio Supervision clients, our fee is separate from and in addition to any fee the client pays to any third-party manager of the client's account(s). Client should review the third-party managers Form ADV, Part 2A brochure or offering documents or regarding fees charged by third-party managers.
- D. Our firm does not charge fees in advance. All billing is done at the end of the quarter, in arrears.
- E. Our supervised persons do not accept compensation for the sale of securities or other investment products, including asset-based sales, charges or service fees from the sale of mutual funds.

ITEM 6. – PERFORMANCE BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Our firm does not accept performance-based fees (fees based on a share of capital gains, or capital appreciation of the assets).

ITEM 7. – TYPES OF CLIENTS

We offer advisory services to individuals, foundations, 401(k) plans, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, and other types of business entities. We do not manage accounts for government entities or pooled investments. The minimum dollar market value of assets for opening and/or maintaining an investment advisory account is \$500,000. Consideration is given to lesser-valued accounts.

ITEM 8. – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

- A. Our investment process is client-driven, allowing our portfolio managers ample opportunity to provide you with the advice and asset management skills needed to make the most of your investments. We begin the investment process by identifying your needs and objectives. We then determine an appropriate allocation strategy and create a customized portfolio for you. Our security analysis methods include charting, fundamental and technical analysis. The main sources of information we use include media, research materials prepared by outside analysts, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Investment strategies include

- long term purchases (securities held at least one year)
- short term purchases (securities sold within a year)
- short sales
- margin transactions
- option writing, including covered options, uncovered options, and spreading strategies

- B. Once your portfolio is fully invested, we provide regular reviews and assessments to confirm that your investment strategies remain consistent with your needs and objectives.

Our philosophy is based on two simple principles

- personal service and
- the highest standards of personal and corporate integrity.

We seek to provide you with competitive rates of return and a comfort level based on a comprehensive understanding of your goals and objectives. The end result is a portfolio tailored to match your specific needs within your tolerance for risk.

Any type of investing in securities involves risk of loss which clients should be prepared to bear.

- C. We are investors not traders. Our Investment Strategy has evolved as new investment products and vehicles have allowed for greater diversification and global reach. It is our job to look at opportunities that are created in these public markets and work with our clients to create a portfolio consistent with their need for liquidity, their comfort level for risk, as well as other considerations. Except for our 401(k) services, generally, we do not use model portfolios. Instead we work closely with clients to

create a custom portfolio using traditional stock and bond investments along with Exchange-Traded Funds (ETFs) and other yield vehicles such as REITs and MLPs when appropriate.

We offer bookkeeping and tax services in addition to investment advisory services. Wealthstreet may offer financial planning services to clients as part of our overall advisory services. Wealthstreet may receive separate compensation for financial planning related services. A financial plan may include a net worth statement, a cash flow analysis, and a review of existing investments and/or retirement assets, investment recommendations, strategic tax planning, estate planning referrals or education planning. Services do not include the preparation of any legal documents. Implementation of the recommendations is at the client's discretion. Less than 5% of total employee time is spent providing these additional services.

EQUITY STRATEGY

The foundation of our equity strategy focuses on companies that grow faster than the economy as a whole. Stock portfolios typically hold 25-50 securities and have low turnover meaning that the number of buys and sells per year is very low. These portfolios generally contain the following types of equities:

- Large Cap Growth - High quality, large capitalization growth companies with favorable profit histories and reasonable valuations
- Mid Cap Leaders - Mid-capitalization industry leader companies with reasonable valuations that thrive in a particular niche
- Turnaround Opportunities - Fallen growth companies that are considered to be in the process of reviving their growth history
- Solid dividend payers who offer value: these companies could benefit from internal or external economic improvement
- Exchange-Traded Funds (ETFs) may also be used to broadly increase exposure to certain sectors, industries, or geographies. For example, in certain portfolios we use ETFs to access international markets, small cap companies, and certain industries.

FIXED INCOME STRATEGY

Our bond strategy includes purchasing debt securities of short to intermediate maturities (typically 3-10 years) and holding them to maturity. The use of fixed income instruments enhances current income and stability in portfolios where it is needed and provides diversity in asset allocation. We may also utilize fixed income-based ETFs, as well as Real Estate Investment Trusts (REITs), and Master Limited Partnerships (MLPs) when appropriate to increase income while attempting to reduce volatility. The risks associated with fixed income include:

- interest rate risk - The chance that a security's value will change due to a change in interest rates.
- company risk - The risk that certain factors affecting a specific company may cause its stock to change in price in a different way from stocks as a whole.
- default risk - The possibility that a borrower will be unable to meet interest and/or principal repayment obligations on a loan agreement.

ETF STRATEGY

We have incorporated the use of exchange-traded funds into our investment philosophy in response to client demand for even greater diversity in both asset classes and type of assets held. ETFs provide clients an opportunity to own assets in numerous asset classes with great diversification.

We use ETFs with a solid history of liquidity

- taxable
- non-taxable
- equity and fixed
- domestic and international

As needed, we develop entire portfolios that are built using only ETFs. We use these portfolios after discussions with you, based on your needs and risk parameters. While the ETFs provide you with numerous choices, the price risk of the underlying assets is not mitigated by their use. These strategies, together or alone, are used in an effort to minimize risk and meet your particular needs and objectives.

ALTERNATIVE STRATEGY

We may use liquid alternatives for diversification in an effort to provide stability to portfolios and protect against downside moves in traditional stock and bond markets. An alternative investment, loosely defined is an investment in any asset other than long-only stocks or bonds. Alternative investments have long been the realm of hedge funds but we access these strategies through mutual funds and exchange traded funds (ETFs). We use mutual funds and ETFs rather than hedge funds for these reasons:

- Superior liquidity
- Lower fees
- Low initial investments requirements
- Greater transparency

Strategies that might be utilized include, but are not limited to:

Long-short equity: Funds that concentrate on equity securities and derivatives and combine long positions with short bets achieved through ETFs, options, or plain-old short stock positions. The balance of short to long positions will depend on the fund's macro outlook.

Market neutral: Funds that seek to minimize systematic risks born of overexposure to specific sectors, countries, currencies, etc. They aim to match short positions and long positions within these areas and achieve low beta.

Non-traditional Bond: This strategy takes unconventional approaches to bond investing, often trying to achieve returns that are uncorrelated with the bond market. "Unconstrained" funds invest with a high degree of flexibility, taking positions in high-yield foreign debt, for example.

Managed Futures: These funds invest primarily through derivatives, including listed and over-the-counter futures, options, swaps and foreign exchange contracts. Most use momentum approaches, while others follow mean-reversion or other strategies.

Multi-alternative: These funds combine different alternative strategies, such as those listed above. They may have fixed allocations to set strategies, or vary their approaches depending on market developments.

ITEM 9. – DISCIPLINARY INFORMATION

- A. Our firm **has not** been involved nor has any management person of our firm been involved in any criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which our firm or management person
- was convicted of, or pled guilty or nolo contendere (“no contest”) to
 - (a) any felony;
 - (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or
 - (c) a conspiracy to commit any of these offenses;
 - is named subject of a pending criminal proceeding that involves investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
 - was found to have been involved in a violation of an investment-related statute or regulation; or
 - was subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, our firm or a management person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.
- B. Our firm **has not** been involved nor has any management person of our firm been involved in any administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or a foreign financial regulatory authority in which our firm or a management person
- was found to have caused an investment-related business to lose its authorization to do business; or
 - was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority
 - (a) denying, suspending, or revoking the authorization of our firm or a management person to act in an investment-related business
 - (b) barring or suspending our firm’s or a management person’s association with an investment-related business
 - (c) otherwise significantly limiting our firm’s or a management person’s investment-related activities; or
 - (d) imposing a civil money penalty on our firm or a management person
- C. Our firm **has not** been involved nor has any management person of our firm been involved in a self-regulatory organization (SRO) proceeding in which our firm or a management person

- was found to have caused an investment-related business to lose its authorization to do business; or
- was found to have been involved in a violation of the SRO's rules and was
 - (a) barred or suspended from membership or from association with other members, or was expelled from members
 - (b) otherwise significantly limited from investment-related activities; or
 - (c) fined

ITEM 10. – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

- A. We are not registered and have no application pending to register, as a broker-dealer or registered representative of a broker-dealer. We offer investment advisory services in addition to bookkeeping, tax, and financial planning services. Less than 5% of total employee time is spent providing these additional services. None of our management persons are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. We are not registered and have no application pending to register as a futures commission merchant, commodity pool operator, or commodity trading advisor. None of our management persons are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or commodity trading advisor.
- C. We have no relationship or arrangement with any related person listed below that might cause a material conflict of interest:
- broker-dealer, municipal securities dealer, or government securities dealer or broker
 - investment company or other pooled investment vehicle (including mutual fund, closed-end investment company, unit investment trust, private investment company or hedge fund and offshore fund)
 - other investment advisor or financial planner
 - futures commission merchant, commodity pool operator, or commodity trading advisor
 - banking or thrift institution
 - accountant or accounting firm
 - lawyer or law firm
 - insurance company or agency
 - pension consultant
 - real estate broker or dealer
 - sponsor or syndicator of limited partnerships
- D. We do not recommend or select other investment advisers, receive compensation directly or indirectly from other investment advisers, or have other business relationships with other investment advisers that might create material conflicts of interest.

ITEM 11. – CODE OF ETHICS

Our firm has established, maintains, and enforces a Code of Ethics. This Code of Ethics is designed to prevent fraud by reinforcing fiduciary principals that must govern the conduct of our advisory firm and our personnel.

A. The Code of Ethics includes:

- standards of business conduct which reflect the fiduciary obligations of our firm and those of all supervised persons; We provide advice that is in the client's best interest. Supervised personnel must not place their interest ahead of the client's interest under any circumstances.
- provisions requiring supervised persons to comply with applicable Federal Securities Laws; each supervised person is asked to acknowledge that they will abide by all Federal Securities Laws as they apply to the company
- provisions that require all access persons to report and our firm to review their personal securities transactions and holdings periodically;
- provisions requiring supervised persons to report any violations of this Code of Ethics promptly to the Chief Compliance Officer;
- provisions requiring our firm to provide each supervised person with a copy of the Code of Ethics and amendments;
- a requirement that supervised persons acknowledge the receipt of the Code of Ethics and Amendments.

We will provide a complete copy of our code of ethics to any client or prospective client upon request.

- B. We do not recommend securities in which we or any related person has a material financial interest other than as a shareholder in which case our interest is aligned with our clients.
- C. We maintain personal accounts, corporate brokerage accounts and various retirement accounts for our employees in which we trade. We purchase shares of companies in which our clients may own stock. In every case, our orders are extremely small in relation to capitalization and have no material impact on the market. Stocks are generally held long term.
- D. Our firm recommends securities to clients or buys or sells securities at the same time that our employees may buy or sell the same securities for the firm or employee's personal accounts. In every case, our orders are extremely small in relation to capitalization and have no impact on the market.

ITEM 12. – BROKERAGE PRACTICES

A. We have an ongoing duty to seek the lowest possible total cost for your transactions.

When we select or recommend broker-dealers for your transactions we consider broker

- commissions
- breadth and quality of services
- execution capability
- financial responsibility
- responsiveness
- quality of services provided
- experience
- reputation
- comfort level of the client

If you choose not to select a broker yourself, we discuss our relationships with discounted brokers with you. We can negotiate commissions and service levels for you and document agreed upon service levels and commission charges.

1. Research and Other Soft Dollar Benefits

We receive research or other products or services other than execution from broker-dealers in connection with client securities transactions.

2. Brokerage for Client Referrals

We participate in a referral service program. There is no direct link between our participation in these programs and the investment advice we give to you. We receive economic benefits for the service provided without cost or at a discount including:

- receipt of duplicate statements and confirmations
- access to a trading desk
- assistance with conferences, and educational meetings
- access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate appropriate shares to client accounts)
- the ability to have advisory fees deducted directly from client accounts
- access to an electronic communication network for client order entry and account information
- access to mutual funds and ETFs with no transaction fees & certain institutional money managers
- certain institutional money managers research related products and tools
- consulting & professional services
- discounts on compliance, marketing, research, technology, and practice management products or services provided by third party vendor

These products and services may

- assist us in managing and administering your accounts including accounts not maintained at the referred brokerage firm
- benefit us but may not benefit your accounts

These services are intended to help us manage and further develop our business enterprise. They do not depend on the amount of brokerage transactions that are directed to the referral programs.

As part of our fiduciary duty to you, we endeavor at all times to put your interest first.

CHARLES SCHWAB & CO. INC.

We do not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We may recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see “Your brokerage and custody costs”).

A. How we select brokers/custodians

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

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- 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 [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services

- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see “Products and services available to us from Schwab”)

B. Your brokerage and custody costs

For our clients’ accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab’s Cash Features Program. In addition to commissions, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab 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 Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How we select brokers/custodians”).

C. Products and services available to us from Schwab

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab’s business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us. Following is a more detailed description of Schwab’s support services:

Services that benefit you: Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum

initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that may not directly benefit you: Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client 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 our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting
- Marketing consulting and support

Services that generally benefit only us: Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

D. Our interest in Schwab's services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services. We may have an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our

selection is primarily supported by the scope, quality, and price of Schwab's services (see "How we select brokers/ custodians") and not Schwab's services that benefit only us.

Additionally, we entered into an agreement with Schwab where we received a benefit that was used toward technology related expenses. The receipt of this benefit was based on the expectation that an additional specified amount of client assets would be placed in Schwab's custody. This arrangement raised conflicts of interest since we had an incentive to recommend that clients maintain accounts with Schwab based on our interest in receiving products and services that benefit our business and reduce operating expenses rather than based on our clients' interest in receiving the best value in custody services. However, our participation in this benefit does not diminish our duty to seek best execution for client accounts and we believe that our selection of Schwab as custodian and broker is in the best interest of our clients despite these benefits.

TD AMERITRADE

We may recommend TD AMERITRADE to our clients for custody and brokerage services. There is no direct link between our participation in the program and the investment advice we give to our clients, although we do receive economic benefits through our participation in the program that are typically not available to TD AMERITRADE retail investors. These benefits include the following products and services (provided without cost or at a discount)

- receipt of duplicate client statements and confirmation
- research related products and tools
- consulting services
- access to a trading desk
- access to block trading (which provides the ability to aggregate securities transaction for execution and then allocate the appropriate shares to our client accounts)
- the ability to have advisory fees deducted directly from our client's accounts
- access to an electronic communications network for client order entry and account information
- access to mutual funds and ETFs with no transaction fees
- access to certain institutional money managers
- discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third party vendors

TD AMERITRADE

We participate in the institutional advisor program offered by TD AMERITRADE Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker- dealer and FINRA member. TD Ameritrade offers to independent investment advisors services

which include custody of securities, trade execution, clearance and settlement of transactions. We receive some benefits from TD Ameritrade through participation in the TDA Program. (Please see the disclosure under Item 14. below.

We consider a number of factors in selecting and/or recommending brokers and custodians for our clients' accounts, including, but not limited to

- execution capability
- experience and financial stability
- reputation
- and the quality of services provide.

TD AMERITRADE may also have paid for business consulting and professional services received by our related persons. Some of the products and services made available by TD AMERITRADE through the program may benefit us but may not benefit our client accounts.

- These products or services may assist us in managing and administering our client accounts, including accounts not maintained at TD AMERITRADE.
- Other services made available by TD AMERITRADE are intended to help us manage and further develop our business enterprise.
- The benefits we receive through participation in the program do not depend on the amount of brokerage transactions directed to TD AMERITRADE.

As part of our fiduciary duties to clients, we endeavor at all time to put the interests of our clients first. Our clients should be aware, that the receipt of economic benefits by us or our related persons in and of itself creates a conflict of interest and may influence our choice of TD AMERTIRADE for custody and brokerage services.

(a) Our firm has not made any commitments to direct transactions to particular brokers in order to pay commission dollars for specific products, research and/or services. We receive research and reports from various brokers without cost in the normal course of doing business. Therefore, the timing and frequency of security transactions can be based solely on the merits of the investment itself and not on any need to generate commission dollars.

3. Directed Brokerage

We permit clients to direct brokerage. You may come to us with an existing broker. You may be paying high transaction costs. If so, we point out both financial and non-financial strengths and weaknesses of the broker and make it clear that lower commission rates may be available elsewhere.

- (a) If you direct us to use a particular broker, we may not be authorized under those circumstances to negotiate commissions and may not be able to obtain volume discounts or best execution. Under these circumstances a disparity in commission charges may exist between the commissions charged to you

since you directed us to use a particular broker or dealer and other clients who do not direct us to use a particular broker.

- (b) If you still choose to use a broker with high transaction costs, you are acknowledging that you are aware that other brokers with lower fees are available and that by executing through a broker of your choice, you may incur higher commissions than may otherwise have been available. Copies of the acknowledgments are kept on file. We document the reasons and factors cited by you for selecting a broker other than one of the brokers recommended by our firm.

Sub-Advisory Relationships

For clients introduced to us through a sub-advisory arrangement, the adviser will determine the custodian and the broker to be used and Wealthstreet will not be able to negotiate commissions and may not be able to obtain volume discounts or best execution. The current custodian and broker for all sub-advised accounts will be Schwab.

Since each account at our firm is individually managed with unique risks and objectives, purchases and sale of securities are generally not aggregated. Occasionally securities are bought and sold at the same time at the same broker for different clients and where the broker may aggregate the orders. There is no added cost to the client under these practices. Clients may end up incurring higher brokerage costs if we choose not to aggregate trades when we have the opportunity to do so.

ITEM 13. – REVIEW OF ACCOUNTS

- A. Our portfolio managers review client accounts at least quarterly. Their review includes the following:
1. The Portfolio Managers use our operations software, as well as the on-line ordering systems of the broker-dealers to check
 - the available cash balance in the accounts - to be sure that there is an ample amount available or if there is a need for immediate cash
 - the positions (amounts and types of securities) in the account to be sure that they are consistent with your objectives
 - that the manager's thoughts on the holdings have not changed
 2. The Portfolio Manager reviews your performance before it is reported to you. The President reviews the performance of all accounts quarterly for performance outliers.
 3. 401(k) model portfolios are reviewed at least monthly by the designated portfolio manager. Additionally, the President reviews the models at least quarterly.

Portfolio Supervision – for clients receiving the portfolio supervision service, the portfolio managers review the investment recommendations and performance of the accounts managed by third-party managers on at least a quarterly basis.

Sub-Advisory Relationships

The portfolio manager reviews sub-advisers accounts at least quarterly.

- B. All portfolios are reviewed regularly.
- C. Our firm sends clients portfolio valuation reports which include
- a quarterly portfolio summary
 - performance calculation, maintaining gross performance, for some clients
 - a quarterly listing of assets by cost basis and market value (appraisal)
 - realized gains and/or losses at year end
 - We provide capital gain and loss reports which may be derived from information supplied to us by others. These reports should not be the sole basis for preparing a tax return. The client is solely responsible for maintaining accurate account records for purposes of preparing tax returns and should verify that the information in all capital gain and loss reports is consistent with the official brokerage records for the account.
 - We provide capital gain and loss reports which show transactions for periods of management. They do not include sales of non-discretionary assets. We use the First In, First Out (FIFO) or Specific Identification accounting method cost basis analysis. The cost basis for accounts previously managed by Weisberg & Fields (W&F) was traced using a highest cost accounting method.

The information in reports for clients whose accounts were previously managed by W&F will be based upon different criteria.

- We use average cost for some non-taxable accounts and mutual funds.
- All questions pertaining to tax preparation should be directed to your tax advisor.

Sub-Advisory Relationships

Clients under a sub-advisory arrangement received reports from the adviser. Wealthstreet does not provide reports directly to the client.

ITEM 14. – CLIENT REFERRALS AND OTHER COMPENSATION

A. Our firm participates in several referral programs.

We may receive client referrals from TD Ameritrade through our participation in TD Ameritrade AdvisorDirect. In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, we may have been selected to participate in AdvisorDirect based on the amount and profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of and unaffiliated with us and there is no employee or agency relationship between us. TD Ameritrade has established AdvisorDirect as a means of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisors. TD Ameritrade does not supervise us and has no responsibility for our management of client portfolios or our other advice or services. We pay TD Ameritrade an on-going fee for each successful client referral. For referrals that occurred through AdvisorDirect before April 10, 2017, this fee is a percentage (not to exceed 25%) of the advisory fee that the client pays to us (“Solicitation Fee”). For referrals that occurred through AdvisorDirect on or after June 9, 2017 the Solicitation Fee is an annualized fee based on the amount of referred client assets that does not exceed 25% of 1%. We will also pay TD Ameritrade the Solicitation Fee on any assets received by us from any of a referred client’s family members, including a spouse, child or any other immediate family member who resides with the referred client and hired us on the recommendation of such referred client. We will not charge clients referred through AdvisorDirect any fees or costs higher than our standard fee schedule offered to our clients or otherwise pass Solicitation Fees paid to TD Ameritrade to our clients. For information regarding additional or other fees paid directly or indirectly to TD Ameritrade, please refer to the TD Ameritrade AdvisorDirect Disclosure and Acknowledgement Form.

Our participation in AdvisorDirect raises potential conflicts of interest. TD Ameritrade will most likely refer clients through AdvisorDirect to investment advisors that encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to obtain client referrals from TD Ameritrade, Advisor may have an incentive to recommend to clients that the assets under management by us be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. In addition, we have agreed not to solicit clients referred to us through AdvisorDirect to transfer their accounts from TD Ameritrade or to establish brokerage or custody accounts at other custodians, except when our fiduciary duties require doing so. Our participation in AdvisorDirect does not diminish our duty to seek best execution of trades for client accounts.

We entered into an agreement with the following firm to participate in their referral program. We no longer participate in this program.

- Schwab Advisor Network™, a referral program of Charles Schwab & CO., Inc. (“Schwab”), an independent and unaffiliated a registered broker-dealer and FINRA member.

While we no longer receive referrals from this program, we continue to pay an on-going fee for each successful past client referral. Our past participation in this program raises potential conflicts of interest.

- We also pay a fee on any referred client’s immediate family members, including a spouse, child or any other immediate family member who resides with the referred client and hired advisor on the recommendation of such referred client.
- We do not charge clients referred through the program any fees or costs greater than the fees or costs we charge clients with similar portfolios which are not referred through the program.
- We pay a separate fee if we recommend the client custody their assets with a custodian other than the referring custodian, therefore, we have an incentive not to recommend that the client consider moving assets to a custodian other than the custodian that referred the client.

Our past participation in this program does not diminish our duty to seek best execution of trades for clients. We put the interests of our clients first. The receipt of economic benefits by us or our related persons in and of itself creates a potential conflict of interest and may influence our choice for custody and brokerage services.

ITEM 15. – CUSTODY

Our firm has custody of certain client assets.

We have limited custody of some of our clients' funds or securities when you authorize us to deduct our management fees directly from your account. We are also deemed to have custody of clients' funds or securities when you have standing authorizations with your custodian to move money from your account to a third-party ("SLOA") and under that SLOA authorize us to designate the amount or timing of transfers with the custodian. The SEC has set forth a set of standards intended to protect client assets in such situations, which we follow.

We are also deemed to have custody when a related person:

- has possession of client funds or securities
- has an arrangement (including a general power of attorney or is a trustee) which authorizes us to withdraw client funds or securities maintained with a custodian
- has possession of or access to client funds in connection with advisory or bookkeeping services provided to clients

A related person is a person directly or indirectly controlling or controlled by the company and any person under common control with the company. The related person's ability to obtain client assets and our limited authority or influence over them poses a sufficient risk.

All client assets are safeguarded in order to prevent them from

- being lost
- misused
- misappropriated
- subject to financial losses

A. QUALIFIED CUSTODIAN – Your assets must be maintained by an independent qualified custodian. Qualified custodians include financial institutions that we use for custodial services including

- banks
- registered broker-dealers
- registered futures commission merchants

1. A qualified custodian maintains funds and securities in a separate account for you under your name; or in accounts that contain only your funds and securities, under our name as agent or trustee for you.

2. We believe, after inquiring, that a qualified custodian that maintains funds or securities for you sends you an account statement for you to review, at least quarterly. The statement

- identifies the amount of funds and each security in your account at the end of the period and
- lists all transactions in the account during that period.

We include a legend in our reports urging you to compare the account statements you receive from the custodian with any statements or other information such as invoices you receive from us to determine whether account transactions, including deductions to pay advisory fees, are accurate. We believe providing regular notice will serve to more effectively remind you to take steps to protect your assets.

- B. CUSTODY AUDIT - We have a written agreement with an independent public accounting firm. They perform an actual examination of our custody accounts (accounts where a related person has custody) at least once during each calendar year. Client funds and securities are verified.

- The examination is done on a surprise basis at a time chosen by the accountant without prior notice or announcement to us.
- The dates of the surprise audits are irregular from year to year.
- The accountant files a certificate on Form ADV-E with the SEC within 120 days of the surprise audit, stating that it has examined the funds and securities of the custody accounts. They also describe the nature and extent of the examination.

ITEM 16. – INVESTMENT DISCRETION

Discretionary Management

Our firm generally accepts discretionary authority to manage client securities accounts. You sign a limited power of attorney (LPOA) with your broker which gives us the authority

- to direct the broker on which securities and amount of securities to purchase and sell for you, or retain on your behalf
- to disburse assets for investment purposes or to you personally
- to remit checks, wire funds, and otherwise make disbursements of funds held in your account to banks, broker-dealers, investment companies, or other financial institutions for credit to an account of identical registration or to you at your address of record

Each client also signs a fee agreement with us that grants us discretion to buy, sell, and trade in stocks, bonds, and other securities. The document allows us to act for you on your behalf with the same force and effect.

New clients also complete a new account information sheet. There is a place on this form for you to list any special investment instructions (limitations on investments, inherited stock, etc.). This information is entered into the client data base and is reviewed often by the account manager.

Non-Discretionary Management

For non-discretionary accounts, we will contact the client before making recommendations we deem appropriate for the client. Non-discretionary clients should be aware that recommendations are typically time sensitive and the following circumstances may cause market movements to work against the client:

1. We will not effect the transaction until we receive verbal or written instructions from the client;
2. We generally will not aggregate transactions for non-discretionary accounts with discretionary and limited-discretionary accounts; and
3. Transactions for non-discretionary accounts will generally be effected after transactions in discretionary and limited-discretionary accounts.

Sub-Advisory Relationships

Custom Accounts are managed by Wealthstreet on a discretionary basis which discretion is granted by adviser to Wealthstreet in the sub-advisory agreement. Model Accounts are managed on a non-discretionary basis with adviser retaining discretion.

ITEM 17. – VOTING CLIENT SECURITIES

- A. Our firm accepts authority to vote client securities for accounts where we you grant us investment discretion. We have designed Proxy voting polices to ensure that your securities are voted in your best interest.

Proxies are voted electronically whenever possible via Broadridge ProxyEdge Internet based system by a portfolio manager.

- This system allows voting and recording proxies online and meets SEC recordkeeping requirements.
- It provides online notification and summary reporting.
- Accounts are added to the system when a new client elects to have us vote on their behalf and deleted when the client closes their account.
- A portfolio administrator assistant or other designated employee ensures that all additions and deletions from the proxy voting list are current.
- All paper ballots that may be received before a portfolio is added to the system are voted by a portfolio manager consistent with its electronic counterparts.

As a general rule, we vote with management recommendations unless we feel that the management does not reflect our views or are specifically instructed by the client to vote otherwise.

Each proxy is closely examined by a portfolio manager for potential conflicts of interest. Conflicts are limited because of the relatively small size of our company and we and our employees currently hold less than a 5% interest in public companies.

- If a potential conflict exists, the portfolio managers meet and decide how to handle such conflicts.
- If the conflict involves your account, you will be notified of the potential conflict and asked to vote your own proxy.
- If the conflict involves a certain manager the other managers will make the proxy decision.

ProxyEdge allows voting as a group or on an individual basis.

We keep records of how proxies were voted in accordance with SEC record keeping requirements. The online system stores information electronically for up to 7 years.

We keep

- proxy voting policies and procedures
- proxy statements received regarding client securities
- records of votes cast on behalf of clients
- written client request for proxy information
- written responses by the advisory to any such written or oral client request

- any documents prepared by the portfolio manager that were material to making a decision to vote, or that memorialized the basis for the decision. Proxy statements may be retrieved from the SEC EDGAR system rather than maintaining copies. We may also rely on third party service providers for information regarding proxies.

Clients are informed annually via our newsletter that information on the voting of their proxies and a copy of the firm's policies and procedures are available upon request.

- B. A client may choose to assume the responsibility of voting their own proxy ballots. They can vote paper ballots or vote on line. For accounts subject to ERISA, an authorized plan fiduciary other than Wealthstreet will retain proxy voting authority. Our investment advisory agreement and/or the plan's written documents will evidence and outline this authority.

Sub-Advisory Relationships

Under a sub-advisory arrangement either the adviser and/or the client are solely responsible for voting proxies and Wealthstreet is precluded from rendering any advice or taking any action on behalf of a sub-advisory client with respect to securities or other investment held in the account, or the issuers thereof, which become the subject of any legal proceedings, including bankruptcies. The adviser retains the right and obligation to take any action relating to securities held in sub-advised accounts. Sub-advised clients should refer to the ADV 2A of the adviser and to their advisory agreement for additional disclosures.

C. Legal Actions

Wealthstreet has appointed Broadridge Investor Communications Solutions, Inc. ("Broadridge") as our administrative agent to process and administrate our client's participation in class action litigation. Broadridge will automatically file securities class action settlement claims on behalf of our clients for cases in which clients are eligible to participate. Settlement claims are fully tracked and monitored.

This service enables our clients:

- To participate in both U.S. and Global securities class action settlements.
- To recover entitled amounts they are eligible for.

Broadridge shall be entitled to a contingency fee of 18% of the total reimbursement of Securities Class Action settlements it collects for our clients.

ITEM 18. – FINANCIAL INFORMATION

- A. Our firm does not require prepayment of fees.
- B. There is no financial condition reasonably likely to impair the ability of our firm from meeting contractual commitments to our clients.
- C. Our firm has not been subject of a bankruptcy petition at any time during the past ten years.