

BKS Financial Investments, LLC d/b/a BKS Retirement Services

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FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of BKS Financial Investments, LLC, dba BKS Retirement Services. If you have any questions about the contents of this brochure, please contact us at 727-723-3676. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about BKS Retirement Services is also available on the Securities and Exchange Commission's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for BKS Financial Investments is 304266.

BKS Retirement Services is a registered investment adviser. Registration with the United States Securities and Exchange Commission ("SEC") or any state securities authority does not imply a certain level of skill or training.

Item 2 Summary of Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

We are a newly registered investment adviser and we have no material changes to report.

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Item 4 Advisory Business

About Us

BKS Financial Investments, LLC d/b/a BKS Retirement Services ("BKS Retirement," "we" or "us") is a registered investment adviser organized as a Florida limited liability company and based in Clearwater, Florida. BKS Retirement acquired the investment advisory business of Fiduciary Partners Investment Consulting, LLC ("FPIC"), a provider of pension investment consulting services since 2007, and all of FPIC's personnel are now associated with BKS Retirement as of June, 2019.

BKS Retirement is wholly-owned by BKS Financial Services Holdings, LLC ("Holdings"); Holdings is wholly-owned by Baldwin Krystyn Sherman Partners, LLC ("Baldwin"). Baldwin is owned by Baldwin Risk Partners, Inc., (Baldwin Risk) which in turn is owned by Baldwin Insurance Group Holdings, LLC. (Baldwin Insurance). Baldwin Insurance is owned by Loper Enterprises, LLC who is owned by Baldwin, Loper, Lowry.

We provide pension investment consulting services to retirement plans, including qualified pension and profit sharing plans, plans described in section 403(b) of the Internal Revenue Code of 1986, as amended ("Code"), plans described in Code §457 and nonqualified deferred compensation plans described in Code §409A (collectively, we refer to these as "Plans").

In this brochure, the words "you," "your" and "client" refer to you as either a client or prospective client of BKS Retirement. Also, we also refer to our officers and employees as "Associated Persons" and those who provide investment advice for us as "Investment Adviser Representatives," or "IARs."

Pension Investment Consulting Services

We offer pension investment consulting services to employee benefit Plans and their fiduciaries designed to assist retirement Plan sponsors, trustees and/or Plan committees in meeting their Plan management and fiduciary obligations under the Employee Retirement Income Security Act of 1974 ("ERISA") and other applicable laws. Our services are tailored based upon the needs of the Plan and the services requested by the Plan sponsor or named fiduciary. In general, these services may include Plan, sponsor and participant education, investment policy development and review, asset allocation advice, vendor searches, performance monitoring and reporting, Plan cost and revenue distribution analyses, and fiduciary governance consulting. These pension investment consulting services are generally non-discretionary and advisory in nature. The ultimate decision to act on behalf of the Plan always remains with the Plan sponsor or other named fiduciaries.

- **Investment Policy Development & Review** - We consider the Investment Policy Statement ("IPS") to be a key component of a Plan's investment program which we utilize as a "road map" to help govern the investment program. We will initially meet with the Plan sponsor, trustees and/or plan committee to gather information to allow us to fully understand a retirement Plan's risk tolerance and investment objectives.

Once we have completed gathering information, we will review the existing IPS or draft a new one which incorporates in the information we gathered. The IPS generally includes: a purpose statement, investment goals and objectives, responsibilities of key personnel, identification of key constraints, eligible investments, asset allocation and liability process, portfolio rebalancing process, risk management process, performance benchmarks and performance reporting process.

- **Asset Allocation Advice** - We will review a retirement Plan's menu of investments and analyze risk/return and correlations between asset classes with the purpose of achieving the goals and objectives of the IPS. Our process for recommending an overall portfolio structure includes:

- IPS constraints;
 - Views and predispositions of the responsible investment fiduciary;
 - Investment sophistication of the responsible investment fiduciary;
 - Cost/benefit of certain investment vehicles; and
 - Performance reporting implications.
- **Vendor Searches** - We may conduct a search of the marketplace and provide quotations from leading retirement plan vendors that are compatible with a Plan's needs. We will then make recommendations regarding vendor selection based upon study results and the Plan's goals and objectives.
 - **Performance Monitoring & Reporting** - We provide retirement Plans with periodic performance reports utilizing Morningstar, Zephyr Style Advisor, Fiduciary Analytics (Fi360) and other recognized multi-factor investment analytical services. We may also utilize in-house resources to provide reporting.
 - **Plan Cost & Revenue Distribution Analysis** - We perform retirement Plan cost and revenue distribution analysis designed to enable Plan fiduciaries to determine whether the fees and expenses of their Plan arrangements are reasonable and consistent with typical industry benchmarks and competitive practices. The analysis will cover such areas as: identification of hidden or embedded fees, cost comparisons from multiple service providers based upon a proprietary benchmarking database, and assistance with implementation of cost reduction initiatives.
 - **Fiduciary Governance Consulting** - We assist in evaluating the structure and process for overseeing and management a retirement Plan to satisfy fiduciary and other plan obligations. Effective fiduciary governance will assist plan fiduciaries in (i) managing regulatory and litigation risks facing Plan fiduciaries, (ii) protecting the Plan sponsor and employees, officers and directors who are not involved in Plan operation, (iii) satisfying obligations to participants, (iv) operating the retirement Plan effectively, and (v) better equipping employees to secure adequate retirement benefits.
 - **Participant Education & Investment Advice** - When agreed to by us and the client, we may provide investment education to Plan participants (the "**Participants**"). Our goal is to supply Participants with information to allow them to make sound investment decisions. Our Participant education program may include sessions which cover both basic and advanced topics such as diversification, asset allocation, risk tolerance, time horizon, as well as the dynamics of existing and potential asset classes which may be suitable for a Participant's portfolio.

We may also offer Participant-level investment advice on an individual basis. So long as our Participant advice is limited to Plan options, we generally provide such advice under our engagement with the Plan. When we so advise Participants directly, they should understand that the following:

- We do not provide advice on any of the Participant's assets outside of the Plan—our advice is limited solely to the Participant's interests in the Plan and the investment options available in the Plan.
- Our agreement with the Plan limits our liability to the Participant and the Plan.
- We will not engage in an ongoing advisory relationship with a Participant, and that instead we will typically only meet with a Participant on a periodic basis to discuss Plan options.
- We will not have any custody over any Participant's assets, whether inside the Plan or

- otherwise, nor will we have any responsibility for selecting brokers or others to execute any transactions for any Participant.
- The Participant retains complete responsibility to determine what Plan investments the Participant will make—we will have no discretion to make any investment decisions for the Participant.
- In some cases, our financial planning and consulting services will be provided to employees of our clients.
- **3(38) Discretionary Fiduciary Services** - When agreed to by us and the client, we provide 3(38) discretionary fiduciary services where we select, monitor and replace Plans' investment lineups and/or provide discretionary management of individual Participant accounts. In some cases, we may refer clients to third party money managers for these services.
- **Administrative Services**- We may provide administrative services such as assisting with on boarding processes and other services as agreed by the client.

Except as described above, we do not maintain discretionary authority or control with respect to clients' accounts. We provide clients with alternatives and various courses of action, but typically the client retains the sole authority to invest Plan / client assets, establishing an IPA and the selection of investments alternatives available in the Plan.

For Plan services, we charge either a fixed annual fee ranging up to \$75,000 or an annual fee ranging between 0.05% and 0.50% of the value of the Plan's assets. Our fees are negotiable, based on the scope and complexity of the services provided. Our fees may be paid directly by the Plan sponsor, out of the Plan's assets, or automatically deducted from the Participants' accounts. Fees may be charged in advance or in arrears based on the value of the Plan's assets at the end of the previous quarter or quarter, respectively.

We may also provide a-la-carte services or special customized investment consulting services which may include one or more of the above. Fees for this service generally range up to \$200,000 depending on the scope and complexity of the services provided. A percentage of the fee will be due and payable in advance with the remainder due upon completion of the services offered. All services are described in a written agreement ("Advisory Agreement") and must be consistent with Plan documents.

Either party to the Advisory Agreement may terminate it between 30 and 60-days' written notice to the other party. The pension investment consulting fees will be prorated for the quarter in which the termination notice is given which means fees will be charged only in proportion to the number of days in the quarter for which you are a client. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

We may also provide executive compensation design, analysis, and implementation. Fees charged for this service are separate and apart from our pension investment consulting fees.

If deemed in the client's best interest we may sign a joint advisory agreement to provide plan services to you with Montoya Financial Strategies, offering advisory services through Kestra Advisory Services, LLC.

Educational Workshops

We may offer educational workshops designed for Participants in various retirement Plans. Workshops may include educational presentations related to retirement planning and investment planning/asset allocation.

Our investment education workshops are provided on an educational basis. As such, information provided at these workshops does not take into account specific needs or circumstances of any particular Participant and is general in nature. However, in some cases, Participant-level retirement Plan investment advice may be provided.

Our firm may, in some cases, charge a negotiable, annual fixed or one time flat fee ranging between \$2,500 and \$25,000, depending on the scope and complexity of the services provided. In certain cases, clients may also be responsible for travel expenses. The fee will be due and payable according to the contract terms between our firm and the corporation/business sponsoring the financial education workshop.

Financial Planning & Consulting

We offer financial planning and consulting services which typically involve providing a variety of advisory services to individuals employed by our clients regarding the management of their financial resources based upon an analysis of their individual needs. If our clients retain our firm for financial planning services, we will meet with those individuals as authorized by our clients and paid for by our client companies to gather information about their financial circumstances and objectives through in-depth personal interviews. The information we gather generally includes current financial status, attitudes toward risk, and future goals. Once we review and analyze the information provided to us, we may deliver a written plan to the individual we are advising, designed to help achieve their stated financial goals and objectives.

Financial plans may be broad-based covering a variety of subjects such as retirement planning, tax/cash flow planning, college planning, personal budgeting, death and disability planning, and/or investment planning or modular in nature covering any single subject matter. For clients in need of targeted advice on a specific area, we provide consulting services on discreet subjects such as estate planning, tax planning, insurance, etc. However, we are not a law firm nor accounting firm, and we do not provide legal or accounting advice—clients must work with their own professionals for that advice.

Financial plans are based on employee/participant financial situation at the time we present the plan, and on the financial information provided to us. The participant/employee must promptly notify us if their financial situation, goals, objectives, or needs change.

The employee/participant is under no obligation to act on our financial planning recommendations. Should they choose to act on any of our recommendations, they are not obligated to implement the financial plan through any of our other investment advisory services. Moreover, the employee/participant may act on our recommendations by placing securities transactions with any brokerage firm.

You may terminate the financial planning agreement/consulting agreement by providing us written notice. You will incur a charge for services rendered prior to the termination of the agreement based on the work performed and any pre-paid un-earned fees will be refunded on a pro-rata basis.

Fee and fee paying arrangements for financial planning and consulting services will vary based on the scope and complexity of the work performed and will be negotiated with each client on a case-by-case basis.

Types of Investments

We primarily offer advice on mutual funds and exchange-traded funds ("ETFs").

Assets Under Management

As of June 30, 2019, the aggregate value of Plan Assets which we consult on is approximately \$4,509,791,046. Our pension investment consulting services are advisory in nature and we do not actively manage client assets.

Item 5 Fees and Compensation

See *"Advisory Business—Description of Our Services & Fees"* above for information on our advisory fees, fee deduction arrangements, and refund policy for each service we offer.

Additional Fees & Expenses

Our advice may involve investments in mutual funds and ETFs. Clients should understand that all fees paid to our firm for advisory services are separate and distinct from the fees and expenses charged by funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. Further, there may be transaction charges involved with purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian holding client funds or securities. Our policy is to disclose all fees and to assist our clients in understanding them. However, the client should review all fees charged by mutual funds, our firm, and others to fully understand the total amount of fees to be paid by the client.

Compensation for the Sale of Other Investment Products

Some of our Associated Persons are also licensed as independent insurance agents with various insurance agencies and can sell insurance products and earn commissions. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on our behalf who are insurance agents have an incentive to recommend insurance products for the purpose of generating commissions rather than solely based on clients' needs. However, clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm. It is our policy that any advisory services we provide for a client will not involve the sale of an insurance product for a commission.

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

We do not charge performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing other accounts that are not charged performance-based fees.

Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account.

Item 7 Types of Clients

We provide pension investment consulting services to retirement plans, including qualified pension and profit sharing plans, plans described in Code §403(b), plans described in Code §457 and nonqualified deferred compensation plans described in Code §409A. In general, we do not require a minimum plan size to establish an advisory relationship.

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

Our Methods of Analysis & Investment Strategies

We utilize two performance measuring/analytical software tools (Fiduciary Analytics and Fiduciary Investment Reporting Manager) to assist us in the monitoring of our clients' funds.

When first working with a client, we will input the plan ticker symbols into the software program. Each quarter we request a report for every client. The software then calculates the performance of the funds. Quarterly, year to date, 1-year, 3-year, 5-year and 10-year numbers are produced. These performance numbers are gross of all of the internal fund expenses and do not take into consideration any deposits made through the quarter. The performance numbers generated are based on quarter ending data.

The report includes performance data on the median return of the fund's peer group as well as the benchmark/index data. A variety of reporting information is available for selection by our firm. Sharpe ratio, Alpha, Beta and a number of other standard measurement statistics. However, we do not have any control over the output of such data. All data is pulled separately by the reporting software from independent sources such as; Lipper, Standard and Poors, etc.

We analyze the data in order to provide recommendations to clients.

Our advice may vary depending upon each client's specific circumstances. As such, we determine advice based upon Plan constraints, predefined objectives and various other suitability factors. Plan restrictions and guidelines affect the composition of portfolios.

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the advisory services we provide.

Risk of Loss

Investing in securities involves risk of loss. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that goals and objectives will be met. Past performance is in no way an indication of future performance.

Recommendation of Particular Types of Securities

As discussed above, we primarily provide advice on mutual funds and ETFs.

Mutual Funds

Mutual funds are professionally-managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows

money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. The returns on mutual funds can be reduced by the costs to manage the funds. Other mutual fund risks include the quality and experience of the fund's management team. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, other types of mutual funds do charge such fees which can also reduce returns.

ETFs

ETFs are investment companies whose shares are bought and sold on a securities exchange. An ETF holds a portfolio of securities designed to track a particular market segment or index. Clients, as a shareholder of an ETF, will bear their pro-rata portion of the ETF's advisory fee and other expenses, in addition to their own account expenses. Investing in ETFs involves risk. ETFs, depending on the underlying portfolio and its size, can have wide price (bid and ask) spreads, thus diluting or negating any upward price movement of the ETF or enhancing any downward price movement. Also, ETFs require more frequent portfolio reporting by regulators and are thereby more susceptible to actions by hedge funds that could have a negative impact on the price of the ETF. Certain ETFs may employ leverage, which creates additional volatility and price risk depending on the amount of leverage utilized, the collateral and the liquidity of the supporting collateral. Further, the use of leverage (i.e., employing the use of margin) generally results in additional interest costs to the ETF. Certain ETFs are highly leveraged and therefore have additional volatility and liquidity risk. Volatility and liquidity can severely and negatively impact the price of the ETF's underlying portfolio securities, thereby causing significant price fluctuations of the ETF.

Item 9 Disciplinary Information

In June 2010, Kenneth Jewell entered into an agreement with the Financial Industry Regulatory Authority (FINRA) whereby Mr. Jewell was suspended from association with any FINRA member firm for two months and is required to pay \$5,000 to FINRA in the event Mr. Jewell re-associates with a FINRA member firm. FINRA alleged that Mr. Jewell neglected to disclose outside business activities (retirement plan consulting provided by an affiliate company) to his broker dealer.

Item 10 Other Financial Industry Activities and Affiliations

Arrangements with Affiliated Entities

We are affiliated with Baldwin Krystyn Sherman Partners (BKS-Partners) through common control and ownership. From time to time we will refer our clients to BKS Partners' to purchase insurance products and we may will compensated based on the sale of these products. You are under no obligation to use BKS Partners to purchase insurance products. Our fees are separate and distinct from compensation earned by BKS Partners for the sale of insurance products. This affiliated firm is otherwise regulated by the professional organizations to which it belongs and must comply with the rules of those organizations. Kenneth Jewell is a managing partner of BKS Partners.

Referral arrangements with an affiliated entity present a conflict of interest for us because we may have a direct or indirect financial incentive to recommend an affiliated firm's services. While we believe that compensation charged by an affiliated firm is competitive, such compensation may be higher than fees charged by other firms providing the same or similar services. You are under no obligation to use the services of any firm we recommend, whether affiliated or otherwise, and may obtain comparable services and/or lower fees through other firms.

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

Description of Our Code of Ethics

We strive to comply with applicable laws and regulations governing our practices. Therefore, we have adopted a Code of Ethics (the "**Code**") that includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our Associated Persons are expected to adhere strictly to these guidelines. Our Code also requires that certain Associated Persons submit reports of their personal account holdings and transactions to us who will review these reports on a periodic basis. Associated Persons associated are also required to report any violations of our Code. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Our Code is available to you upon request. You may obtain a copy of our Code by contacting Kenneth Jewell, Managing Member, at 727-723-3676.

Item 12 Brokerage Practices

We do not recommend broker-dealers/custodians to clients, nor do we receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Item 13 Review of Accounts

Pension Investment Consulting Services

Kenneth Jewell, Steve Gissiner or Michael Assaf will conduct a formal review of Plan/individual accounts on at least a quarterly basis or as otherwise contracted for.

We provide clients with written reports on at least an annual basis or as otherwise contracted for and interim report may be provided upon client request or upon triggering factors including a change in market conditions or a change in the Plan's investment objectives.

Financial Planning & Consulting Services

Kenneth Jewell, Steve Gissiner or Michael Assaf conduct a review/update of financial plans as agreed with the client, which will be on a case by case basis.

Item 14 Client Referrals and Other Compensation

In some cases, when we refer clients to third party money managers for investment advisory services, including 3(38) discretionary management, we may receive a referral fee from the third party manager. You will not pay any higher fees charged by the third party manager as a result of this arrangement.

As disclosed under the *Fees and Compensation* section in this brochure, persons providing investment advice on behalf of our firm are licensed insurance agents. For information on the conflicts of interest this presents, and how we address these conflicts, refer to the *Fees and Compensation* section.

We directly compensate non-employee (outside) consultants, individuals, and/or entities (solicitors) for client referrals. Currently we have a solicitor arrangement with an affiliated firm, BKS Partners. In order to receive a cash referral fee from us, solicitors must comply with the requirements of the jurisdictions in which they operate. If you were referred to us by a solicitor, you should have received a copy of this

brochure along with the solicitor's disclosure statement at the time of the referral. If you become a client, the solicitor that referred you to us will receive a percentage of the advisory fee you pay us for as long as you are our client, or until such time as our agreement with the solicitor expires. You will not pay additional fees because of this referral arrangement. Referral fees paid to a solicitor are contingent upon your entering into an advisory agreement with us. Therefore, a solicitor has a financial incentive to recommend us to you for advisory services. This creates a conflict of interest; however, you are not obligated to retain us for advisory services. Comparable services and/or lower fees may be available through other firms.

Solicitors that refer business to more than one investment adviser may have a financial incentive to recommend advisers with more favorable compensation arrangements. We request that our solicitors disclose to you whether multiple referral relationships exist and that comparable services may be available from other advisers for lower fees and/or where the Solicitor's compensation is less favorable.

Other Compensation

We receive compensation from BKS Partners for referring clients to them for insurance or other services. All referral fees paid to our firm represent a portion of the fees actually charged to you by BKS Partners for insurance or other services provided.

We may refer clients that are in need to advisory services not provided by our firm, to Montoya Financial Strategies, offering advisory services through Kestra Advisory Services, LLC. At this time we do not receive a referral fee.

Item 15 Custody

We may directly debit our advisory fees from some Plan accounts. This ability to deduct our advisory fees causes us to exercise limited custody over Plan funds or securities. We do not have physical custody of any funds and/or securities. Plan funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. Plans will receive account statements from the independent, qualified custodian(s) holding funds and securities at least quarterly. The account statements from the Plan's custodian(s) will indicate the amount of our advisory fees deducted each billing period. You should carefully review account statements for accuracy.

You should compare our statements with the statements from the Plan's account custodian(s) to reconcile the information reflected on each statement. If you have a question regarding the Plan's account statement or if you did not receive a statement from the custodian, please contact Kenneth Jewell, Managing Member, at 727-723-3676.

Item 16 Investment Discretion

In some cases, we may provide 3(38) fiduciary services where we have discretion to select and replace a Plan's lineup of investments. In such cases, clients must provide us with the requisite discretionary authority. When providing such services, we adhere to the investment policies, limitations and restrictions of the Plan. In the event clients wish to impose any guidelines or restrictions, they must be provided to us in writing.

We may also provide 3(38) fiduciary services where we have discretion to manage individual Participant accounts. In such cases, individual Participants must grant us discretion over the selection and amount of securities to be purchased or sold for Participant account(s) without obtaining consent or approval prior to each transaction. Clients may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for their account(s) in writing. For example, they

may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Restricting the types of securities we may give advice on in this manner will change the results of the advice we give to you.

Item 17 Voting Client Securities

We will not vote proxies on clients' behalf, irrespective of any Plan documents. If Plans own shares of common stock or mutual funds, the Plan fiduciaries are responsible for exercising rights to vote. Clients should receive proxy materials directly from the account custodian. However, in the unlikely event we were to receive any written or electronic proxy materials, we would forward them directly to clients by mail, unless we are authorized to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

Item 18 Financial Information

Our firm does not have any financial condition or impairment that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and, we do not require the prepayment of more than \$1,200 in fees six or more months in advance. Therefore, we are not required to include a financial statement with this brochure.

We have not filed a bankruptcy petition at any time in the past ten years.

Item 19 Requirements for State-Registered Advisers

We are a federally registered investment adviser; therefore, we are not required to respond to this item.

Item 20 Additional Information

Your Privacy

We view protecting our customers' private information as a top priority and we have instituted policies and procedures to ensure that customer information is kept private and secure.

We do not disclose any nonpublic personal information about our customers or former customers to any non-affiliated third parties, except as permitted or required by law. In the course of servicing a client's account, we may share some information with affiliated entities such as BKS Partners as well as service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers.

We restrict internal access to nonpublic personal information about clients to those employees who need to know that information in order to provide products or services to the client. As emphasized above, it has always been and will always be our policy never to sell information about current or former customers or their accounts to anyone. It is also our policy not to share information unless required to process a transaction, at the request of a customer, or as required by law.

Class Action Lawsuits

We do not determine if securities held by clients are the subject of a class action lawsuit, nor do we initiate or participate in litigation to recover damages on a client's behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by clients.