

ADV DISCLOSURE BROCHURE (Form 2A)

Item 1 – Cover Page



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This Brochure provides information about the qualifications and business practices of Hochman Cole Investment Advisors, Inc (hereinafter, "HCIA"). If you have any questions about the contents of this Brochure, please contact us at (847) 559-0180. 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.

HCIA is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about HCIA also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

Hochman Cole Investment Advisors, Inc. is required to advise you of any material changes to our Firm Brochure (“Brochure”) from our last annual update, identify those changes on the cover page of our Brochure or on the page immediately following the cover page, or in a separate communication accompanying our Brochure. We must clearly state that we are discussing only material changes since the last annual update of our Brochure, and we must provide the date of the last annual update of our Brochure.

There are no material changes at this time. If you have any questions, do not hesitate to call or email Hochman Cole’s Chief Compliance Officer, Philip J. Cole, CFP®

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Item 4 – Advisory Business

HCIA, an Illinois corporation formed in 2006, is a fee-based investment advisor registered with the SEC with its principal place of business located in Deerfield, IL. The firm's principal shareholders are Joel L. Hochman, President and Philip J. Cole, Vice President. As of 12/31/18, HCIA manages \$334 million of assets on a discretionary basis.

Our investment advisory services are provided to individuals, small businesses and retirement plans. Financial planning services are tailored to the individual needs of clients and include retirement planning, investment management, tax planning, estate planning, risk transfer planning (insurance) and education planning. While each of these services are available on a stand-alone basis, certain of them may also be rendered in conjunction with investment management as part of our comprehensive Wealth Management engagement (described in more detail below.)

Wealth Management

HCIA provides clients with wealth management services which includes a broad range of comprehensive financial planning and consulting services as well as discretionary management of investment portfolios.

HCIA generally allocates client assets among various mutual funds and exchange traded funds (ETFs) in accordance with their investment objectives. The firm may utilize options, individual bonds and/or equity securities in client accounts as well.

HCIA tailors its advisory service to meet the needs of individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with their needs and objectives. HCIA consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity restraints and other related factors relevant to the management of their portfolios. Clients are advised to promptly notify HCIA if there are changes to their financial situation, or if they wish to place reasonable limitations on the management of their portfolios.

Financial Planning/Consulting

Where HCIA charges separately for financial planning and consulting services under a stand-alone engagement. These fees are negotiable, but generally range from \$1,500 to \$10,000, depending upon the scope and complexity of the services. If the client engages the firm for additional investment advisory services, HCIA may offset all or a portion of its fees for those services based upon the amount paid for financial planning and/or consulting services.

Automated Investment Program

HCIA also offers an online portfolio management program (ASCEND Intelligent Portfolios) in conjunction with Schwab Intelligent Portfolios® (the "Program") and sponsored by Schwab Wealth Investment Advisory, Inc. ("SWIA"). The Program uses automated investing to create a diversified portfolio composed of Charles Schwab sponsored exchange-traded funds (ETFs), as well as a FDIC-insured cash allocation (the "Cash Allocation") that is based on the client's stated investment objectives and risk tolerance. The Program is designed to monitor a client's portfolio daily and will also automatically rebalance as needed to keep a client's portfolio consistent with their selected risk profile. The client's portfolio is held in a brokerage account opened by the client at SWIA's affiliate, Charles Schwab & Co., Inc. (CS&Co).

We are independent of and not owned by, affiliated with, or sponsored or supervised by SWIA, CS&Co or their affiliates (together, "Schwab"). The Program is described in the Schwab Wealth Advisory, Inc. Institutional Intelligent Portfolios Disclosure Brochure, which is presented to clients by SWIA during the online enrollment process.

We, and not Schwab, are the client's investment advisor and primary point of contact with respect to the Program. SWIA's role is limited to delivering the Program Disclosure Brochure to the clients and administering the Program so that it operates as described in the Program Disclosure Brochure.

Because we maintain more than \$100 million in client assets in accounts at CS&Co that are not enrolled in the program, we do not pay SWIA fees for its services in the Program.

We assess clients a fee for our services as described below under Item 5 Fees and Compensation. Our fees are not set nor supervised by CS&Co. Clients do not pay brokerage commissions nor any other fees to CS&Co as part of the Program.

Retirement Plan Consulting

HCIA provides various consulting services to qualified employee benefit plans and their fiduciaries. The service is designed to assist plan sponsors in structuring, managing and optimizing their corporate retirement plans. Each engagement is individually negotiated and customized, and may include any or all of the following services:

- Plan Review & Evaluation
- Executive Planning & Benefits
- Investment Selection
- Plan Fee & Cost Analysis

- Plan Committee Consultation
- Participant Education

As disclosed in the Advisory Agreement, certain of the foregoing services are provided by HCIA as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). In accordance with ERISA section 408(b)(2), each plan sponsor is provided with a written description of HCIA’s fiduciary status, the specific services to be rendered and all direct and indirect compensation the firm reasonably expects under the engagement.

Item 5 – Fees and Compensation

Wealth Management

The annual fee for wealth management services will be charged as a percentage of assets under management. Assets under management will be billed according to the following tiered-billing schedule:

\$0 - \$1,000,000	1.00% of Assets
\$1,000,001 - \$2,000,000	0.85% of Assets
\$2,000,001 - \$5,000,000	0.75% of Assets
\$5,000,001 - \$10,000,000	0.70% of Assets
Over \$10,000,000	0.60% of Assets

A minimum of \$500,000 of assets under management is generally required for this service. This account size may be negotiable under certain circumstances. HCIA may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

Unless otherwise agreed, client accounts will be directly debited quarterly in advance at the beginning of each calendar quarter based upon the value (market value or fair market value in the absence of market value) and weighting of the client's account at the end of the previous quarter.

Clients should note that the principal executive officers or advisors of HCIA may, from time to time, receive 12b-1 distribution fees from investment companies in connection with the placement of client funds into investment companies. Typically, advisory fees are discounted for 12b-1 fees earned.

Financial Planning/Consulting

Financial Planning and Consulting fees will be charged as a fixed fee, typically ranging from \$1,500 - \$10,000, depending on the nature and complexity of each client's circumstances. 50% of this fee will be due upon signing the financial planning or consulting services agreement, with the balance due upon presentation of the financial plan or consulting work to the client, however, advance payment will never exceed \$500 for work that will not be completed within six months.

Typically, for financial planning clients, the financial plan will be presented to the client within 90 days of the contract date, provided that all information needed to prepare the financial plan is promptly provided by the client.

There is a minimum fee of \$1,000 for financial planning/consulting services. This minimum fee may be negotiable in certain circumstances. In some cases, an hourly fee may be charged at a rate of \$400/hr.

Automated Investment Program

HCIA's annual investment advisory fee for the Services described in Section 2 of the Investment Advisory Agreement is set at an annual rate of .48% payable quarterly in advance based upon the "Account Market Value" of the portfolio at the end of the previous quarter for which the services are performed. The "Account Market value" shall be defined as the total amount of all cash and securities held in an account. Account Market Values that do not meet the Program minimum investment threshold of \$5,000 will not be charged until the Program minimum is met. The advisory fee the client pays HCIA is not set or supervised by Schwab. The client does not pay brokerage commissions or any other fees to CS&Co as part of the Program. Schwab does receive other revenues in connection with the Program, as described in the Program Disclosure Brochure available at <https://intelligent.schwab.com>. Once the client's account reaches \$5,000, the client will be charged the annual fees for the remainder of the time the account is sub-advised by HCIA.

General Information

Fees: In certain circumstances, fees and account minimums may be adjusted.

Calculation of Fees: The fee charged is calculated as described above. Fees are not charged on the basis of a share of capital gains, or capital appreciation of the funds. (Section 205(a)(1) of the Advisers Act).

Transitioned Account Fees: Client accounts transitioned from firms at which the principals of HCIA were employed prior to the formation of HCIA may be charged a fee different from the

fee disclosed above because HCIA has decided to honor the fee schedule agreed upon between the client and the firm at which the account was previously serviced. This different fee schedule is not available to all or even most HCIA clients.

Termination of Agreements: A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty at any time. If the agreement is terminated prior to the end of the quarter, fees are refunded on a pro-rata basis based on the number of days remaining in the quarter.

Other Expenses: All fees paid to HCIA for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and exchange traded funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without the services of HCIA. In that case, the client would not receive the services provided by HCIA which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by HCIA to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

In addition to HCIA's advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s).

Class Actions, Bankruptcies and Other Legal Proceedings: HCIA will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held in the client's account(s), including, but not limited to, the filing of Proofs of Claim in class action settlements. If desired, clients may direct HCIA to transmit copies of class action notices to the client or a third party. Upon such direction, HCIA will make commercially reasonable efforts to forward such notices in a timely manner.

Commissions, Incentives and 12b-1 Fees: If a client executes recommended securities transactions through associated persons of HCIA in their separate capacities as registered representatives of Cetera Financial Specialists LLC, a FINRA member firm, these individuals may earn commissions which are separate and distinct from fees charged for advisory services.

If the traded security is also a managed asset on which advisory fees apply, then the trade will be placed at cost and additional commissions will not be charged unless unusual circumstances apply. Any additional commission to be charged will be disclosed to the client.

In addition, HCIA and/or its advisors may, from time to time, receive incentive awards for the recommendation/introduction of insurance products. Finally, as disclosed above, the advisors of HCIA may, from time to time, receive 12b-1 distribution fees from investment companies in connection with the placement of client funds into investment companies.

Typically, advisory fees are discounted for 12b-1 or incentive fees but are not discounted for commissions earned by HCIA and/or its principal executive officers or associates nor are commissions credited toward future advisory fees.

Notwithstanding the above, advisory fees will always be offset for commissions or fees earned on securities transactions executed in pension, profit-sharing, 401(k) or other client accounts where to do otherwise would constitute a prohibited transaction under the provisions of ERISA or the Internal Revenue Code and where an exemption does not otherwise apply.

Additional Compensation: If a client executes recommended securities transactions through associated persons of HCIA in their separate capacities as registered representatives of Cetera Financial Specialists LLC, a FINRA member firm, these individuals may earn commissions which are separate and distinct from fees charged for advisory services.

While these individuals endeavor at all times to put the interest of the clients first as part of HCIA's fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations.

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

HCIA does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

HCIA provides portfolio management services to individuals, high net worth individuals, trusts and foundations. A minimum of \$500,000 of assets under management is required for wealth management services. This account size may be negotiable under certain circumstances.

Clients placing assets under our management for less than \$500,000 will generally have their assets managed under the ASCEND Intelligent Portfolios program (the “Program”). Clients eligible to enroll in the Program include individuals, IRAs, and revocable living trusts.

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

At Hochman Cole, we engage in a disciplined investment selection process consisting of fundamental analysis, technical analysis, and cyclical methods. Information is obtained from annual reports, prospectuses, SEC filings, press releases, financial publications, seminars and subscription services such as Morningstar. Because we are independent and privately owned, our recommendations are objective and impartial, and are not influenced by the demands and sales quotas that could be imposed by a corporate parent.

Investment Strategy

At Hochman Cole, we believe that no single investment strategy will outperform the overall market every year. However, a diversified investment approach combined with a disciplined strategy has greater potential to outperform over time.

We believe that no two clients are exactly the same in terms of their investment goals or financial challenges. Every client with whom we work comes with a unique set of circumstances that must be considered when constructing an investment strategy. Risk tolerance, time horizon, liquidity requirements, tax circumstances and other assets must be factored in when designing a portfolio. Each portfolio ends up reflecting the individual client and is specific to his or her needs. As circumstances and markets change over time, we maintain close communications with our clients to ensure their portfolio continues to meet their changing needs.

Our highly customized portfolios are designed to produce consistent long-term investment performance while minimizing risk. We have the ability to diversify across a broad spectrum of

investment products that may include stocks, bonds, Exchange Traded Funds (ETFs), mutual funds, options and private money managers, depending on our clients' personal goals.

Risk of Loss

Investing in securities involves a risk of loss that advisory clients should be prepared to bear. If you are not prepared to bear the risk of loss, HCIA's advisory services may not be suitable for you.

Cash Balances

HCIA may hold all or a portion of client assets in money market instruments depending on the client's objectives as well as other conditions that may make it advantageous to do so either on a temporary or permanent basis.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all facts regarding any legal or disciplinary events that would be material to your evaluation of HCIA or the integrity of HCIA's management. HCIA has no material facts to disclose applicable to this item.

Item 10 – Other Financial Industry Activities and Affiliations

The principal executive officers and associates of HCIA are separately licensed as registered representatives of Cetera Financial Specialists LLC (hereinafter, "CFS BD"), an unaffiliated, FINRA-registered broker dealer and as Investment Adviser Representatives of Cetera Investment Advisors LLC (hereinafter CIA). HCIA may recommend CFS BD to clients for brokerage services. As Registered Representatives, of CFS BD, the principal executive officers of HCIA may receive a portion of any mutual fund sales charges or brokerage commissions from the implementation of securities recommendations. In addition, as appropriate, HCIA may refer clients to CIA for advisory services not otherwise offered by HCIA. There are no referral fee arrangements, bonuses or incentive programs linked to referrals between HCIA and CFS BD, CIA. However, while acting in their separate capacities as registered representatives of CFS BD, these principal executive officers or advisors will be able to effect securities transactions for clients for which they will receive separate, yet customary, compensation. Similarly, should these principal executive officers or advisors provide investment advisory services to a client referred to CIA in their separate capacities as an Investment Adviser Representatives of CIA, they will receive separate, yet customary compensation from CIA as appropriate.

The principal executive officers and advisors of HCIA are also insurance agents or brokers for one or more insurance companies. As such, these individuals, in their separate capacities as insurance agents or brokers, will be able to provide insurance and insurance-related investment

products (insurance) for clients, for which they will receive separate, yet customary compensation.

Clients, however, are not under any obligation to engage these individuals when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client. While these individuals endeavor at all times to put the interest of the client first as part of HCIA's fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations

HCIA may from time to time compensate, either directly or indirectly, any person (defined as a natural person or a company) for client referrals. HCIA is aware of the special considerations promulgated under Section 206(4)-3 of the Investment Advisers Act of 1940 and similar state regulations. As such, appropriate disclosure shall be made, all written instruments will be maintained by HCIA and all applicable Federal and/or State laws will be observed.

Referral fees may be paid to a registered representative of CFS BD who may also be a solicitor of HCIA. Additionally, CFS BD may receive a portion of the investment advisor fee. The client's fee will not be increased as a result of this referral fee being paid to these parties. Furthermore, the principal executive officers of HCIA are also registered representatives of CFS BD.

Item 11 – Code of Ethics

HCIA has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at HCIA must acknowledge the terms of the Code of Ethics annually, or as amended.

HCIA anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which HCIA has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which HCIA, its affiliates and/or clients, directly or indirectly, have a position of interest. HCIA's employees and persons associated with HCIA are required to follow HCIA's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of HCIA and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for HCIA's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of HCIA will

not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of HCIA's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between HCIA and its clients. HCIA's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Lynn Hallen.

To mitigate these potential conflicts of interest and ensure the fulfillment of our fiduciary responsibilities, we have established the following restrictions:

1. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No principal or employee of our firm may refer his or her own interest to that of the advisory client;
2. It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts;
3. We maintain a list of all securities holdings for our firm and anyone associated with this advisory practice with access to advisory recommendations;
4. We emphasize the unrestricted right of the client to decline to implement any advice rendered, except in situations where our firm is granted discretionary authority;
5. All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices; and
6. Any individual not in observance of the above may be subject to disciplinary action or termination.

It is HCIA's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. HCIA will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client.

A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

Soft Dollars

Hochman Cole Investment Advisors, Inc., as a matter of policy and practice, does not have any formal or informal arrangements or commitments to utilize research, research-related products and other services obtained from broker-dealers, or third parties, on a soft dollar commission basis.

Portfolio Management Services

HCIA has discretionary authority to custody client assets with Pershing LLC and/or Charles Schwab. The principal executive officers and associates of HCIA are separately registered as representatives of Cetera Financial Specialists LLC, a FINRA-member broker dealer unaffiliated with HCIA. Under FINRA Rules, CFS BD is required to supervise the securities trading activities of its representatives. Due to the administrative burden of attempting to supervise the securities trading activities of its registered representatives through multiple brokers, CFS BD does not permit its registered representatives to place trades through clearing firms other than Pershing and Charles Schwab. As such, HCIA may not accept client accounts who do not agree to have their assets held at either Pershing or Schwab. Not all advisers require clients to direct the use of a particular broker dealer. Although HCIA requires that clients establish brokerage accounts with either Pershing LLC or Charles Schwab, HCIA is independently owned and operated and not affiliated with Pershing or Charles Schwab.

In directing the use of CFS BD it should be understood that HCIA will not have authority to negotiate ticket charges among various broker dealers or to necessarily obtain volume discounts, and best execution may not be achieved. In addition, a disparity in commission charges may exist between the commissions charged to the client and those charged to other clients. In general, non-advisory clients are charged higher commissions.

Pershing LLC and Charles Schwab do not charge separately for custody services, but are compensated by account holders through commissions and other transaction-related trades.

Institutional Trading and Custody Services

Charles Schwab provides HCIA with access to its institutional trading and custody services, which are not typically available to Schwab retail investors. These services are generally available to independent advisors on an unsolicited basis, at no charge to them as long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at Schwab. These services are not contingent upon HCIA committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research and access to mutual funds and other investments that are otherwise generally available to institutional investors or that would require significantly higher minimum investment.

Other Products and Services

We have entered into a Client Benefit Confirmation Agreement whereby Schwab has agreed to provide an agreed upon (between us and Schwab) annual dollar commitment for technology expenses. The agreement is based on the expectation that we continue to have a minimum dollar amount in client assets held in Schwab accounts.

Schwab and Pershing also make available to HCIA other products and services that benefit HCIA but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of HCIA's accounts. Schwab also makes available to HCIA its managing and administering software and other technology that:

- provide access to client account data (such as trade confirmations and account statements)
- facilitate trade execution and allocate aggregated trade orders for multiple accounts
- provide research, pricing and other market data
- facilitate payment of HCIA's fees from its clients' accounts
- assist with back office functions

In evaluating whether to recommend or require that clients custody their assets at Charles Schwab, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely the nature, cost or quality of custody and brokerage services provided by Charles Schwab, which may create a potential conflict of interest.

Financial Planning/Consulting Services

The principals and associates of HCIA are also separately registered as representatives of CFS BD, a FINRA-registered broker-dealer unaffiliated with HCIA. HCIA may recommend the use of CFS BD, provided that this recommendation is consistent with HCIA's fiduciary duty to the client. Any commissions or other compensation received from the implementation of financial planning recommendations is separate and distinct from HCIA's advisory fee. No financial planning or consulting client is obligated to use CFS BD to implement any recommended transactions.

Clients should be aware that best execution and lower commissions may not necessarily be achieved if recommended transactions are placed through these individuals, in their separate capacities as registered representatives (or insurance agents/brokers).

Item 13 – Review of Accounts

Investment Management

REVIEWS: While the underlying securities within investment management accounts are continuously monitored, these accounts are reviewed at least quarterly by Joel Hochman, Philip Cole or Mike Williams of HCIA. Accounts are reviewed in the context of each client's investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment. Accounts are reviewed in random order. When trading identical securities across multiple discretionary accounts, we will generally do so with one aggregate trade, where each discretionary account receives the same execution price for that day.

REPORTS: In addition to the monthly statements and confirmations of transactions that Wealth Management Services clients receive from their broker dealer, HCIA will provide quarterly reports summarizing account performance, balances and holdings. ASCEND clients will only receive monthly statements and confirmations from Charles Schwab.

Financial Planning/Consulting

REVIEWS: These client accounts will be reviewed as contracted for at the inception of the advisory relationship.

REPORTS: Financial Planning clients will receive a completed financial plan. Additional reports

will not typically be provided unless otherwise contracted for. Consulting Services clients will not typically receive reports due to the nature of the service.

Item 14 – Client Referrals and Other Compensation

Hochman Cole Investment Advisors, Inc., as a matter policy and practice, may compensate persons, i.e., individuals or entities, for the referral of advisory clients to the firm provided appropriate disclosures and regulatory requirements are met. At the present time, HCIA is not involved with any third party solicitors.

Item 15 – Custody

As a matter of policy and practice, Hochman Cole Investment Advisors, Inc. does not permit employees or the firm to accept or maintain custody of client assets. It is our policy that we will not accept, hold, directly or indirectly, client funds or securities, or have any authority to obtain possession of them. Hochman Cole Investment Advisors, Inc. will not intentionally take custody of client cash or securities.

Item 16 – Investment Discretion

HCIA manages securities accounts on a discretionary basis (per Agreement). Investment decisions are delegated to HCIA without prior consultation from the client, subject, however to the investment policies and objectives of each client.

Item 17 – Voting *Client* Securities

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

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about HCIA's financial condition. HCIA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.