



Part 2A of Form ADV: FIRM DISCLOSURE BROCHURE

ITEM 1 – COVER PAGE

**The DentGroup LLC
d/b/a Dent Asset Management (“DAM”)**

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12/31/2018

This disclosure brochure provides information about the qualifications and business practices of Dent Asset Management (DAM). If you have any questions about the contents of this brochure, please contact us at 225-922-9955 or dg@dentgroup.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. Registration does not imply any level of skill or training.

Additional information about Dent Asset Management also is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. **Our firm's CRD number is 151943.**

ITEM 2 – MATERIAL CHANGES

This section of the ADV Part 2A brochure is meant to describe any material changes relating to DAM that clients should be aware of since the last update of this brochure. Accordingly, the following changes are disclosed:

ENHANCED WEALTH GUIDANCE OFFERING

In an effort to enhance the quality and breadth of services that DAM provides to its clients, DAM now offers a process and platform using a suite of digitally powered wealth management technology solutions.

This offering is detailed below in Item 4 in the section entitled, “ENHANCED WEALTH GUIDANCE”. Fees for this service are detailed in Item 5.

We will provide you with a new ADV brochure as necessary based on changes to our business or the services provided to you, or if there is new information to inform you about, at any time, without charge.

Our brochure may be requested by contacting our main office at 225-922-9955. Our brochure is also available on our web site www.dentgroup.com, also free of charge.

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ITEM 4 – ADVISORY BUSINESS

The DentGroup LLC, dba Dent Asset Management (hereinafter “DAM” or “Advisor”) is a Registered Investment Advisor (RIA) with the Securities and Exchange Commission (SEC) under the Investment Advisers Act of 1940, as amended and is organized under the laws of the State of Louisiana. Its principal place of business is located in Baton Rouge, Louisiana. Dent Asset Management began conducting business as an RIA in 2009. Prior to 2009, Dent Asset Management was an investment advisor representative of Raymond James Financial Services, Inc.

Fred Dent CFA is the principal shareholder of The DentGroup, LLC and controls 100% of the company.

DAM offers the following advisory services to our clients:

INVESTMENT SUPERVISORY SERVICES AND INDIVIDUAL PORTFOLIO INVESTMENT MANAGEMENT

Our firm provides continuous advice to our clients regarding the investment of client funds based on the individual needs of the client. Through personal discussions, in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment approach and create and manage a portfolio based on that approach.

During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

We manage these advisory accounts on a discretionary basis. Account supervision is guided by the client's stated objectives (i.e., capital preservation, growth with income, growth, or speculative growth), as well as tax considerations.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Securities traded over-the-counter
- Corporate debt securities (other than commercial paper)
- Certificates of deposit
- Municipal securities
- Mutual fund shares
- United States government securities
- Exchange traded funds (ETFs)
- Money market funds and cash alternatives

Because some types of investments involve certain additional degrees of risk, they will only be implemented or recommended when they are consistent with the client's stated investment objectives, tolerance for risk, liquidity, and suitability.

Where appropriate, DAM also provides advice about any type of legacy position or other investment held in client portfolios. Clients may engage DAM to manage and/or advise on certain investments that are not held at the primary custodian, such as variable life insurance and annuity contracts and assets held in employer sponsored

retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, DAM directs or recommends the allocation of client assets among the various investment options available with the product. DAM may charge an additional fee for this advice. These assets are generally maintained at the underwriting insurance company or the custodian designated by the product's provider. At no time will DAM accept or maintain custody of a client's funds or securities. All client assets will be managed within their designated account[s] at the custodian, pursuant to the client investment advisory management agreement.

ENHANCED WEALTH GUIDANCE

In addition to investment management services, and for an additional fee, clients may enroll in DAM's Enhanced Wealth Guidance process. The ongoing Enhanced Guidance is generally delivered through a client guidebook and an on-line portal. This process provides clients with a net worth summary, goals and priorities, funding for retirement, and other key personal benchmarks all in one place. The process also provides detailed information of the results of collaborative client financial guidance exercises conducted between clients and DAM advisors. The various tools of the guidance process offer a platform for clients to collaborate with DAM advisors and receive up to date information about their assets and goals.

When providing a consolidated financial summary of accounts to clients, data included may contain information about accounts for which DAM does not manage or advise the Client. As such, no inference should be drawn that DAM serves as the adviser on all securities listed on these consolidated financial summaries. For client assets that DAM is not granted discretionary authority to manage, it will not actively supervise those assets.

As an ongoing service, with the client's cooperation, DAM will meet with clients periodically to monitor their risk profiles and objectives by updating the financial guidance provided to account for changes. Meetings may occur in-person or remotely by telephone or webinar.

AMOUNT OF MANAGED ASSETS

As of 12/31/2018, we actively manage \$213,000,000 of client assets on a discretionary basis.

ITEM 5 – COST OF SERVICES, FEES, AND COMPENSATION

INVESTMENT SUPERVISORY SERVICES AND INDIVIDUAL PORTFOLIO MANAGEMENT FEES

Our annual fees for Investment Supervisory Services are based upon a percentage of assets under management and generally range from **0.75 to 1.00%** under the following schedule:

Portfolio Value	Base Fee
Up to \$2,000,000	1.00%
Above \$2,000,000	.75
Above \$10,000,000	negotiable

Our fees are billed in arrears at the end of each calendar quarter based upon the value (market value or fair market value in the absence of market value) of the client's account at the end of the previous quarter. Fees are debited from the account in accordance with the client authorization in the client investment advisory management agreement.

A minimum of **\$1,000,000** of assets under management is required for this service. DAM may, in its sole discretion, negotiate to charge a lesser minimum based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship, account retention, and pro bono activities. DAM may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee. There is generally a \$5,000 household minimum annual fee for this service.

Limited Negotiability of Advisory Fees: Although Dent Asset Management has established the aforementioned fee schedule, we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances, and needs will be considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets, related accounts, portfolio style, account composition, reports, and other factors. The specific annual fee schedule will be identified in the contract between the adviser and each client.

Discounts, not generally available to our advisory clients, may be offered to family members and friends of associated persons of our firm.

ENHANCED WEALTH GUIDANCE FEES

The fee for the Enhanced Wealth Guidance process is additional to the above investment management fees:

Portfolio Value	Base Fee
Up to \$2,000,000	.25%
Above \$2,000,000	.10
Above \$10,000,000	negotiable

DAM may charge a lower guidance fee for certain clients based on client case complexity and other discretionary factors under a separate engagement determined by DAM as described above in **'Limited Negotiability of Advisory Fees'**. There is generally a \$1,500 minimum annual fee for this service.

GENERAL INFORMATION

Termination of the Advisory Relationship: A client agreement may be canceled at any time, by either party, for any reason per the terms of our client investment advisory management agreement.

Mutual Fund and ETF Fees: All fees paid to Dent Asset Management for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs 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 our services. In that case, the client would not receive the services provided by our firm 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 our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Additional Fees and Expenses: In addition to our 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 transaction for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

Grandfathering of Minimum Account Requirements: Pre-existing advisory clients are subject to Dent Asset Management's minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. Therefore, our firm's minimum account requirements will differ among clients.

ERISA Accounts: Dent Asset Management is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"). As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include, among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Dent Asset Management may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees.

Advisory Fees in General: Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Direct Fee Debit: Clients generally provide DAM and/or certain independent managers, with the authority to directly debit their accounts for payment of the investment advisory fees. The financial institutions that act as the qualified custodian for client accounts, from which the Advisor retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to DAM.

Account Additions and Withdrawals:

Clients may make additions to and withdrawals from their account at any time, subject to DAM's right to terminate an account. Additions may be in cash or securities provided that the Advisor reserves the right to liquidate any transferred securities or declines to accept particular securities into a client's account. Clients may withdraw account assets on notice to DAM, subject to the usual and customary securities settlement procedures. However, the Advisor generally designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives. DAM may consult with its clients about the options and implications of transferring securities.

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

Dent Asset Management does not charge performance-based fees.

ITEM 7 - TYPES OF CLIENTS

Dent Asset Management provides advisory services to the following types of clients:

Individuals or Families (other than 'high-net-worth' individuals)

'High-net-worth' Individuals or Families

Pension and profit-sharing plans (other than plan participants)

Charitable organizations

Corporations or other businesses not listed above

As a condition for starting and maintaining an investment management relationship, DAM generally imposes a minimum annual fee of \$5,000. This minimum fee may cause Clients with smaller portfolios to incur an effective fee rate that is higher than the Advisor's stated fee schedule. DAM may, in its sole discretion, elect to waive its minimum fee based upon certain criteria, including anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, and pro bono activities.

ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

METHODS OF ANALYSIS

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Fundamental Analysis: We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company) to determine if the security is underpriced (indicating that it may be a good time to buy) or overpriced (indicating that it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk because the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the security.

Asset Allocation: Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Mutual Fund and/or ETF Analysis: We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if the manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, because we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security thereby increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF which could make the holding(s) less suitable for the client's portfolio.

Risks for all forms of analysis: Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

INVESTMENT STRATEGIES

We use the following strategy(ies) in managing client accounts provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Long-term purchases: We purchase securities with the idea of holding them in the client's account for a year or longer. Typically, we employ this strategy when:

we believe the securities to be currently undervalued, and/or

we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Risk of Loss: Securities investment returns are not guaranteed, and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

ITEM 9 - DISCIPLINARY INFORMATION

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Our firm and our related persons are not engaged in other financial industry activities and have no other industry affiliations.

ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS, AND PERSONAL TRADING

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Dent Asset Management and our personnel owe a duty of loyalty, fairness, and good faith toward our clients and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Dent Asset Management's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by

email sent to dg@dentgroup.com, or by calling us at 225-922-9955.

Dent Asset Management and individuals associated with our firm are prohibited from engaging in principal transactions.

Dent Asset Management and individuals associated with our firm are prohibited from engaging in agency cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees 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.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be owned by a client.

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, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

Because these situations represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

No principal or employee of our firm may put his or her own interest above the interest of an advisory client.

No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.

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. This prevents such employees from benefiting from transactions placed on behalf of advisory accounts.

Our firm requires prior approval for any IPO or private placement investments by related persons of the firm.

We maintain a list of all reportable securities holdings for our firm and anyone associated with this advisory practice that has access to advisory recommendations ("access person"). These holdings are reviewed on a regular basis by our firm's Chief Compliance Officer or his/her designee. We have established procedures for the maintenance of all required books and records. All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. We require delivery and acknowledgement of the Code of Ethics by each supervised person of our firm. We have established policies requiring the reporting of Code of Ethics violations to our senior management. Any individual who violates any of the above restrictions may be subject to termination.

ITEM 12 - CUSTODIAN AND BROKERAGE PRACTICES

Because our firm does not have the discretionary authority to determine the broker-dealer to be used or the commission rates to be paid, clients must direct Dent Asset Management as to the broker-dealer custodian to be used.

Dent Asset Management *requests* that clients direct us to place trades through Raymond James Financial Services ("Broker"). Dent Asset Management has evaluated Raymond James Financial Services and believes that it will provide our clients with a blend of execution services, commission costs, and competence that will assist our firm to meet our fiduciary obligations to clients.

We reserve the right to decline acceptance of any client account for which the client directs the use of a broker other than Raymond James Financial Services if we believe that this choice would hinder our fiduciary duty to the client and/or our ability to service the account. In directing the use of Raymond James Financial Services, it should

be understood that Dent Asset Management will not have authority to negotiate commissions 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 (who may direct the use of another broker).

Clients should note that, while Dent Asset Management has a reasonable belief that Raymond James Financial Services is able to obtain best execution and competitive prices, our firm will not be independently seeking best execution price capability through other brokers. Not all advisers require clients to direct it to use a particular broker-dealer custodian.

As a matter of policy and practice, Dent Asset Management does not generally 'block' (aggregate) client trades and, therefore, we implement client transactions separately for each account. Consequently, certain client trades may be executed before others at a different price and/or commission rate. Additionally, our clients may not receive volume discounts available to advisers who 'block' client trades.

SOFTWARE AND SUPPORT PROVIDED BY CUSTODIANS:

DAM receives, without cost from Raymond James, computer software and related systems support, which allow DAM to better monitor client accounts maintained at Raymond James. DAM receives the software and related support without cost because the Advisor renders investment management services to clients that maintain assets at Raymond James. The software and support is not provided in connection with securities transactions of clients (i.e., not "soft dollars"). The software and related systems support may benefit DAM, but not its Clients directly. In fulfilling its duties to its clients, DAM endeavors at all times to put the interests of its clients first. Clients should be aware, however, that DAM's receipt of economic benefits from a broker/dealer creates a conflict of interest since these benefits may influence the Advisor's choice of broker/dealer over another that does not furnish similar software, systems support or services.

Specifically, DAM receives the following benefits from Raymond James:

- Receipt of duplicate client confirmations and bundled duplicate statements;
- Access to a trading desk that exclusively services its institutional traders;
- Access to an electronic communication network for client order entry and account information.
- Access to Broadridge client newsletter service.
- Various corporate discounts such as travel, telephone, and shipping services.
- Periodic continuing-education travel opportunities.
- Access to institutional investment research.

ITEM 13 - REVIEW OF ACCOUNTS

INVESTMENT SUPERVISORY SERVICES INDIVIDUAL PORTFOLIO MANAGEMENT

Reviews: While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, client accounts are reviewed periodically. Accounts are reviewed in the context of each client's stated 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, and economic environment. These accounts are reviewed by: Fred Dent CFA, Zaheer Poptani LLB, MBA MA and Mawee Takyi CFP®.

Reports: In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, we provide quarterly reports summarizing account investment return, balances, and holdings.

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

It is Dent Asset Management's policy to not engage solicitors or to pay related or non-related persons for referring potential clients to our firm.

It is Dent Asset Management's policy to not accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

ITEM 15 – CUSTODY

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

Our firm does not have actual or constructive custody of client accounts.

ITEM 16 - INVESTMENT DISCRETION

Clients hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission. Our discretionary authority includes the ability to do the following without contacting the client: Determine the security to buy or sell; and/or Determine the amount of the security to buy or sell. Clients give us discretionary authority when they sign the client investment advisory management agreement with our firm and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

ITEM 17 - VOTING CLIENT SECURITIES

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We do not offer any consulting assistance regarding proxy issues to clients.

ITEM 18 - FINANCIAL INFORMATION

Dent Asset Management has no additional financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

Dent Asset Management has not been the subject of a bankruptcy petition at any time during the past ten years.

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