

**ITEM 1: COVER PAGE**  
**PART 2A OF FORM ADV: FIRM BROCHURE**  
**MARCH 2019**



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This brochure provides information about the qualifications and business practices of BluePrint Wealth Alliance, LLC. If you have any questions about the contents of this brochure, please contact us at 800-894-5122 or [info@bpwalliance.com](mailto:info@bpwalliance.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. Additional information about BluePrint Wealth Alliance, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching CRD #284167.

Please note that the use of the term "registered investment adviser" and description of our firm and/or our associates as "registered" does not imply a certain level of skill or training. Clients are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise clients for more information on the qualifications of our firm and our employees.

## ITEM 2: MATERIAL CHANGES

During our most recent review of our Part 2A of Form ADV (“Firm Brochure”), we made several changes that we believe will help further clarify our business practices with our clients and potential clients. This includes summarizing material changes (as discussed below), as well as making more “cosmetic” changes, such as reordering and relocating certain information so that our Firm Brochure more closely follows the preferred “Narrative Format.”

Our primary goal in this review is to promote effective communication and transparency.

The following is a summary of the material changes made since the brochure dated February 2018:

### Item 4: Advisory Business

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#### A. Types of Services Offered

*Wealth Advisory Service:* We have updated our Wealth Advisory service agreement to indicate that our firm is generally authorized with discretionary authority. Additionally, we have redefined the nature of the Wealth Advisory service to include ongoing asset management, coupled with the option to engage in financial planning and/or consulting at our cost.

Further information regarding our asset management Strategies can be found in Item 8: Methods of Analysis, Investment Strategies and Risk of Loss.

*Asset Management Service:* We are no longer accepting new clients into our standalone Asset Management service.

*Tax Advisory, Tax Preparation, and Accounting services:* We have updated our Firm Brochure to include Tax Advisory, Tax Preparation, and Accounting services as defined services of our firm.

**E. Regulatory Assets Under Management:** As of January, 2019 our firm manages \$113,122,384 on a discretionary basis and \$17,559,707 on a non-discretionary basis for total regulatory assets under management of \$130,682,091.

### Item 5: Fees and Compensation

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#### A. Compensation for our Advisory Services:

*Financial Planning and Consulting:* We have defined “One-time Flat Fee” and “Ongoing Flat Fee” arrangements. The flat fee financial planning and consulting minimum has been removed, and we have introduced a one(1)-hour minimum requirement for hourly fee engagements.

*Asset Management and Schwab Institutional Intelligent Portfolios:* We have removed information regarding fees for our Asset Management and Schwab Institutional Intelligent Portfolios, as these services are no longer applicable.

Introduced the following discounts:

- Veterans, Military, and Public Safety Workers discount.
- Tax Preparation Services discount for Wealth Advisory clients.

**B. Fee Collection:** Introduced a Fee Collection section to outline our methods of fee collection.

**D. Fees Paid in Advance:** “D. Termination & Refunds:” has been replaced with “D. Fees Paid in Advance” to provide a clearer explanation of our Financial Planning and Consulting, and Wealth Advisory practices surrounding Fees Paid in Advance and the refunds of any such fees.

**E. Compensation for the Sale of Securities:** Updated this section to state *“Our firm does not participate in commissions for the sales of securities from a broker-dealer.”*

## **Item 7: Types of Clients**

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Further defined our types of clients.

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

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We made numerous changes to the information in this section, including relocating certain information that was previously found under Item 4: Advisory Services. We have also added information regarding Fund Management, and enhanced the language surrounding our Investment Strategies (“B. Investment Strategies We Use”).

## **Item 10: Other Financial Industry Activities and Affiliations**

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**A. Broker-Dealer Registration and Broker-Dealer Affiliations:** We have added this section to clearly indicate that “BluePrint Wealth Alliance, LLC nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.”

**B. Registration as Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor:** We have added this section to clearly indicate “BluePrint Wealth Alliance, LLC nor its representatives are registered as, or have pending applications to become, a futures commission merchant, commodity pool operator, or a commodity trading advisor.”

**C. Material Arrangements and Relationships:** We have added this section to disclose that certain representatives of our firm offer Tax Advice, Tax Preparation, and/or Accounting Services, and that certain representatives of our firm are insurance agents or insurance brokers.

## **Item 12: Brokerage Practices**

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**A. Broker-Dealer Selection:** We have enhanced our language to reflect the Research and Other Soft Dollar Benefits we may receive.

*Brokerage for Client Referrals:* We have added language to reflect that *“BluePrint does not knowingly receive client referrals from a broker-dealer and therefore does not have an incentive to select or recommend a broker-dealer because of broker-dealer referred clients.”*

*Directed Brokerage:* We have updated the information to reflect that BluePrint no longer allows clients to direct the Firm to execute all or a portion of their transactions through a specific broker. Special Considerations for ERISA Clients are still applicable.

## **Item 13: Review of Accounts and Financial Plans**

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**Periodic Review:** In addition to our Chief Compliance Officer (or his/her delegate) reviewing client suitability prior to the initial investment of client funds, ongoing reviews of client suitability information and accounts are conducted by our Wealth Managers at least annually.

## **Item 14: Clients Referrals and Other Compensation**

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**B. Compensation for Referral Fees:** Our firm does not currently pay referral fees to independent solicitors for the referral of clients to our firm.

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## ITEM 4: ADVISORY BUSINESS

### A. Our Firm

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BluePrint Wealth Alliance, LLC (“BluePrint”, “Firm”, “we”, “us,” or “our firm”) is dedicated to providing individuals, couples, families, trusts, estates, pension and profit-sharing plans, and other types of clients with a wide array of investment advisory and financial planning services. Our firm is a limited liability company formed under the laws of the State of Florida in 2016 and has been in business as an investment adviser since that time. Our firm is wholly owned by BPW Holdings, LLC. Jeffrey Levine and German Ramirez are each 40% owners of BPW Holdings, LLC. Patrick Kuster is a 20% owner of BPW Holdings, LLC.

Our firm provides asset management, financial planning, and investment consulting services for many different types of clients to help meet their financial goals while remaining sensitive to risk tolerance and time horizons. As a fiduciary, it is our duty to always act in the client’s best interest. This is accomplished, in part, by knowing the client. Our firm has established a service-oriented advisory practice with open lines of communication. Investment advisor representatives (“Wealth Managers”) work with clients to understand their investment objectives while educating them about our process, facilitating the kind of working relationship we value.

### B. Types of Advisory Services Offered

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#### Financial Planning and Consulting:

Our firm provides a variety of standalone Financial Planning and Consulting services to clients for the management of financial resources based upon an analysis of their current situation, goals, and objectives. This Financial Planning or Financial Consulting may encompass, but is not limited to, Investment Planning, Retirement Planning, Estate Planning, Charitable Planning, Education Planning, Tax-Aware Corporate and Personal Planning, Mortgage/Debt Analysis, or Business and Personal Financial Planning.

**Financial Planning:** For Financial Planning engagements, we typically provide a written summary to the client of their financial situation as well as our observations and recommendations within six (6) months of the client signing a contract with us.

**Financial Consulting:** For Financial Consulting engagements, we usually do not provide a written summary of our observations and recommendations as the process is less formal than our Financial Planning service. Financial Consulting can be a one-time, ongoing, or as desired engagement.

Clients may but are under no obligation to utilize our firm to implement any financial planning or financial consulting recommendations, and the implementation itself is at the discretion of the client.

Clients have the option to utilize our Financial Planning and Consulting service to provide for the aggregation of asset information with no on-going supervision, trading, or discretion with respect to securities transactions by us. Clients are responsible for placing and executing their own trades, either on their own or with another investment adviser. We provide non-continuous and periodic outside account monitoring.

## Wealth Advisory:

Our Wealth Advisory service (“Wealth Advisory”) encompasses asset management and assists clients in meeting their financial goals by providing an opportunity for financial planning and financial consulting services to Wealth Advisory clients at our cost.

Our firm conducts at least one client meeting to understand the client’s current financial situation, existing resources, financial goals, and tolerance for risk, and constructs an individual investment portfolio tailored to the specific needs and goals of the client. Investment portfolios may include individual stocks, bonds, exchange traded funds (“ETFs”), options, mutual funds and other public and private securities or investments. Portfolios are continuously and regularly monitored, and if necessary, rebalanced based upon the client’s individual needs, stated goals and objectives.

Our firm is generally authorized, without prior consultation with clients, to buy, sell, and trade in stocks, bonds, mutual funds, and other securities and/or contracts, as well as to ability to hire and fire third-party investment advisory firms. This is commonly referred to as having *discretionary authority*.

More information regarding our investment strategies, methods of analysis, and risk of loss can be found in: Item 8: Methods of Analysis, Investment Strategies and Risk of Loss. Client and Adviser will agree upon the scope of the Financial Planning and/or Consulting services to be provided.

Our firm is no longer accepting new clients into our standalone Asset Management service. Legacy clients of BluePrint already receiving services under this agreement may continue to receive such services and therefore certain legacy clients of BluePrint may receive asset management services under an agreement separate from our Wealth Advisory service.

## Retirement Plan Consulting:

Our firm provides Retirement Plan Consulting services to employer plan sponsors on an ongoing basis. Generally, such consulting services consist of assisting employer plan sponsors in establishing, monitoring and reviewing their company’s participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising could include: investment options, plan structure, plan fiduciary training, and participant education.

Retirement Plan Consulting services typically include:

- *Establishing an Investment Policy Statement* – Our firm will assist in the development of a statement that summarizes the investment goals and objectives along with the broad strategies to be employed to meet the objectives.
- *Investment Options* – Our firm will work with the Plan Sponsor to evaluate existing investment options and make recommendations for appropriate changes.
- *Asset Allocation and Portfolio Construction* – Our firm will develop strategic asset allocation models to aid Participants in developing strategies to meet their investment objectives, time horizon, financial situation and tolerance for risk.
- *Investment Monitoring* – Our firm will monitor the performance of the investments and notify the client in the event of over/underperformance and in times of market volatility.

In providing services for retirement plan consulting, our firm does not provide any advisory services with respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly traded REITS), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs not offered by a custodian our firm has a direct custodial relationship with (collectively, “Excluded Assets”).



All retirement plan consulting services shall be in compliance with the applicable state laws regulating retirement consulting services. This applies to client accounts that are retirement or other employee benefit plans (“Plan”) governed by the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). If the client accounts are part of a Plan, and our firm accepts appointment to provide services to such accounts, our firm acknowledges its fiduciary standard within the meaning of Section 3(21) or 3(38) of ERISA as designated by the Retirement Plan Consulting Agreement with respect to the provision of services described therein.

### **Courtesy Account Services**

Our firm may offer, at its discretion, “Courtesy Account” services to clients. Under these arrangements, our firm will perform only limited servicing functions and will provide no investment management or continuous account supervision. Clients have the exclusive responsibility for any purchase/sale, rebalancing, performance and monitoring of all securities within such an account. Our firm is not authorized, without prior consultation with the client, to buy, sell, or trade in stocks, bonds, mutual funds, or other securities and/or contracts relating to the same.

### **Tax Advisory, Tax Preparation, and Accounting Services**

In addition to investment and wealth management services, our firm provides tax advisory, tax preparation (“Tax Preparation”), and accounting services (together, “Tax Services”) through certain of its tax-licensed professionals. Such tax and accounting services are rendered only pursuant to a written engagement letter, which is separate from BluePrint’s investment advisory and financial planning agreements. Any Tax Services will be provided by BluePrint’s professionals in their separate licensed capacities.

Clients are not required to use BluePrint for any Tax Services. BluePrint’s fees for Tax Services may be higher or lower than those available from other professional advisers for similar services.

BluePrint does not provide, and no portion of our services should be interpreted as, legal advice.

## **C. Tailoring of Advisory Services**

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Our firm offers individualized investment advice to our Wealth Advisory clients. General investment advice will be offered to our Financial Planning and Consulting, Retirement Plan Consulting clients.

Each Wealth Advisory client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account.

## **D. Participation in Wrap Fee Programs**

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Our firm is the sponsor and portfolio manager of a wrap fee program as further described in Part 2A, Appendix 1 (the “Wrap Fee Program Brochure”). We no longer offer this program to new clients. Our firm does not manage wrap fee accounts in a different fashion than non-wrap fee accounts. All accounts are managed on an individualized basis according to the client’s investment objectives, financial goals, risk tolerance, etc.

## E. Regulatory Assets Under Management

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As of January 2019 our firm manages \$113,122,384 on a discretionary basis and \$17,559,707 on a non-discretionary basis for total regulatory assets under management of \$130,682,091.

### ITEM 5: FEES AND COMPENSATION

#### A. Compensation for Our Advisory Services

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##### Financial Planning and Consulting:

Our firm charges an hourly rate or a flat fee for financial planning and consulting services. The total estimated fee, as well as the ultimate fee charged, is negotiable and is based on the scope and complexity of our engagement with the client.

**Flat Fee:** There is no flat fee minimum for either financial planning or consulting engagements. Flat fees are not to exceed \$25,000 for financial planning or consulting services within any given calendar year. Flat fee arrangements are either:

*One-Time:* Generally, project-based commitments outlining a specific scope (such as a written financial plan) with an estimated completion date; or

*Ongoing:* Planning and/or consulting with no pre-established date for the end of services to be rendered.

**Hourly:** The maximum hourly fee to be charged for either financial planning or consulting will not exceed \$500. There is a one(1) hour minimum commitment for hourly financial planning or consulting services.

##### Wealth Advisory:

Our annual advisory fee for Wealth Advisory services is subject to negotiation, and is generally a flat fee, fixed rate or based on the assets under management according to the tiered fee schedule as described below:

Asset Range	Total Maximum Fee
\$0 - \$500,000	1.25%
Next \$1.5MM	0.99%
Next \$3MM	0.79%
Next \$5MM	0.49%
Next \$10MM	0.25%
Greater than \$20MM	<i>Negotiable</i>

Flat fees and fixed rates are typically similar to an estimate of what a client would pay in the tiered fee schedule, although the flat fee or fixed rate may be slightly higher or lower than the blended tiered rate depending on the services provided.

Annualized fees are billed on a pro-rata basis monthly in arrears based on the value of the account(s) on the time-weighted daily average of the month. For some custodians, BluePrint may not have the facility to calculate time-weighted daily average balances, and in these cases the advisory fee will be based on the closing balance of the prior billing period as reflected on the custodial statement.

Adjustments will be made for deposits and withdrawals during the month. As part of this process, Clients understand the following:

- The client's independent custodian sends statements at least quarterly showing the market values for each security included in the Assets and all account disbursements, including the amount of the advisory fees paid to our firm; and
- If our firm sends a copy of our invoice to the client, a legend urging the comparison of information provided in our statement with those from the qualified custodian will be included.

For any third-party advisor services rendered to our clients, our firm may compensate third party investment advisory firms a percentage of the overall investment advisory fee charged by our firm. The advisory fee paid shall not exceed the fee published for this service. The terms and conditions under which the client shall engage a third-party investment advisory firm shall be set forth in a separate agreement between the client and the designated third party.

In addition, for family and friends of the Firm, the Firm may, in its sole discretion, reduce or waive management fees in their entirety. Further, certain legacy clients of BluePrint receive Asset Management Services under fee arrangements different from those described above under our Wealth Advisory service.

### **Retirement Plan Consulting:**

Our Retirement Plan Consulting services (not otherwise provided through our Wealth Advisory service) are billed on either an hourly or flat fee basis, or as fee based on the percentage of Plan assets under management. The total estimated fee, as well as the ultimate fee charged, is based on the scope and complexity of our engagement with the client.

**Flat Fee:** There is a \$1,000 flat fee minimum for Retirement Plan Consulting engagements. Flat fees are not to exceed \$50,000 for Retirement Plan Consulting engagements within any given calendar year.

**Hourly:** The maximum hourly fee to be charged for Retirement Plan Consulting engagements will not exceed \$500. There is a one(1) hour minimum commitment for Retirement Plan Consulting engagements.

**Percentage of Plan Assets:** Fees based on a percentage of managed Plan assets will not exceed 1.00%.

**Method of Fee Payment:** The fee-paying arrangements for Retirement Plan Consulting service will be determined on a case-by-case basis and will be detailed in the signed consulting agreement. Method of fee payment can include direct invoice to client or via direct fee payment by the plan record keeper/plan custodian to our firm utilizing the record keeper/plan custodian's standard fee debit methodology and frequency.

### **Veterans, Military, and Public Safety Workers Discount:**

Our firm offers a 10% discount for Wealth Advisory services to Veterans, Active Military, and Active or Retired Public Safety Workers (broadly to include, but is not limited to, Fire, Police, Rescue, and Emergency Medical Services).

### **Tax Preparation Services Discount for Wealth Advisory Clients:**

Certain clients who receive Wealth Advisory services from BluePrint are eligible to receive a discount for BluePrint's Tax Preparation Service. Our firm offers a 25% discount for Tax Preparation Services to

Wealth Advisory clients of BluePrint who are under our general fee schedule as described under section “Compensation of Our Advisory Services” above or those receiving our Veterans, Military, and Public Safety Workers Discount.

BluePrint can, in its sole discretion, offer lower fees for Tax Services or waive fees for such services for clients who do not meet the stated criteria. Certain legacy clients of BluePrint receive Tax Preparation Services under fee arrangements different from those described above.

Any tax advice, tax preparation, or accounting services will be provided by BluePrint’s professionals in their separate licensed capacities.

## B. Fee Collection

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Wealth Advisory fees are generally deducted from client account(s), and our firm will send an invoice directly to the custodian for such fees. Clients will provide authorization permitting our firm to be directly paid by these terms. In rare cases, our firm will agree to directly invoice the client, maintaining the ability to deduct fees from the client account(s) in the event a direct invoice is not paid.

## C. Other Types of Fees and Expenses

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Wealth Advisory clients will incur transaction charges for trades executed in their accounts. These transaction fees are separate from our firm’s advisory fees and will be disclosed by the chosen custodian. Clients may also pay charges imposed directly by a mutual fund, index fund, or exchange traded fund, which shall be disclosed in the fund’s prospectus (i.e., fund management fees, initial or deferred sales charges, mutual fund sales loads, 12b-1 fees, surrender charges, variable annuity fees, IRA and qualified retirement plan fees, and other fund expenses). Our firm does not receive a portion of these fees.

Our firm, at its discretion, may refund expenses incurred by the client, such as expenses incurred during the transfer of assets to BluePrint, or costs incurred for the engagement in services with BluePrint (such as postage).

Wrap clients will not incur transaction costs for trades. More information about this can be found in our separate Wrap Fee Program Brochure.

## D. Fees Paid in Advance

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### Financial Planning and Consulting:

**Fees Paid in Advance Before Services Rendered:** Our firm generally requires a retainer, which is to be applied to the ultimate financial planning or consulting fee, at the time of signing. The remainder of the fee will be directly billed to the client and due upon delivery of the financial plan or consultation rendered. Our firm will not require a retainer exceeding \$1,200 when services cannot be rendered within 6 months

**Refunds of Fees Paid in Advance:** *Financial Planning and Consulting clients may terminate their agreement at any time by providing written notice.* For purposes of calculating refunds, all work performed by the firm up to the point of termination shall be calculated at the hourly fee currently in effect (unless otherwise explicitly outlined in their agreement). Clients will receive a pro-rata refund of unearned fees based on the time and effort expended by our firm.

## Wealth Advisory:

**Fees are not collected in advance.** *Either party may terminate the advisory agreement signed with our firm for Wealth Advisory services in writing at any time.* Upon notice of termination, pro-rata advisory fees for services rendered to the point of termination will be promptly charged. If advisory fees cannot be deducted, our firm will send an invoice for due advisory fees to the client.

## Retirement Plan Consulting

Either party may terminate a Retirement Plan Consulting Agreement at any time by providing written notice to the other party. Full refunds will only be made in cases where cancellation occurs within 5 business days of signing an agreement. After 5 business days from initial signing, either party must provide the other party 30 days' written notice to terminate billing. Billing will terminate 30 days after receipt of termination notice. Clients will be charged on a pro-rata basis, which considers work completed by our firm on behalf of the client. Clients will incur charges for bona fide advisory services rendered up to the point of termination (determined as 30 days from receipt of said written notice) and such fees will be due and payable.

## E. Compensation for the Sale of Securities

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Our firm does not participate in commissions for the sales of securities from a broker-dealer. More information relating to any affiliations or activities can be found in Item 10: Other Financial Industry Activities and Affiliations.

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

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

## ITEM 7: TYPES OF CLIENTS

Our firm has the following types of clients:

- **Individuals:** BluePrint includes trusts, estates, solo 401(k) plans and IRAs of individuals and their family members to the definition of individuals but does not include businesses organized as sole proprietorships;
- **High Net Worth Individuals:** BluePrint uses rule 205-3 of the Advisers Act to define a "qualified client" or "high net worth individual"; and
- **Pension and profit-sharing plans.**

Our firm does not impose requirements for opening and maintaining accounts or otherwise engaging us.

## ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

BluePrint's investment methodology includes the belief that investment diversification isn't limited to varying asset classes (such as stocks and bonds). For BluePrint, diversification also includes evaluating different types of investment vehicles (such as individual stocks versus funds), different investment

fund management styles (such as actively traded mutual funds versus passive exchange traded funds), and asset allocation holding strategies (such as "passive" or "buy-and-hold" versus "tactical").

We prefer and encourage the use of an Investment Policy Statement ("IPS") with all Wealth Advisory clients. An IPS will:

- Define client investment objectives, broadly defined as Conservative, Moderate-Conservative, Moderate, or Moderate-Aggressive Growth, and Aggressive Growth;
- Document client investment purpose(s);
- Outline client volatility tolerance, investment time horizon, investment guidelines, and liquidity needs;
- Establish any investment restrictions the client may have; and
- Determine the frequency of portfolio rebalancing and portfolio reviews.

Cash, such as bank sweep deposits, money market funds, CDs, government-backed debt instruments, and high-grade commercial paper, are considered an asset class that BluePrint may use in a client portfolio.

## A. Methods of Analysis

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We may employ the following methods of analysis or research reliance in formulating our investment advice and/or managing client assets:

**Cyclical Analysis:** statistical analysis of specific events occurring at a sufficient number of regular intervals that they can be forecasted into the future. Cyclical analysis asserts that cyclical forces drive price movements in the financial markets. Risks include that cycles may invert or disappear and there is no expectation that this type of analysis will pinpoint turning points, instead be used in conjunction with other methods of analysis.

**Charting:** Chart pattern analysis can be used to make short-term or long-term forecasts. The data can be on different timeframes including daily, weekly or monthly data. In this type of technical analysis, we review charts of market and security activity in an attempt to identify when the market is moving up or down and to predict when how long the trend may last and when that trend might reverse.

**Fundamental analysis** considers the economic, financial, and other qualitative/quantitative factors that may impact the price of a security. Fundamental analysis attempts to measure its intrinsic value as compared to its current price. Risks may include using incorrect assumptions, financial misreporting and/or failure by management to disclose key, material events, and unforeseen micro/macroeconomic factors that may cause the price of a security to diverge from its intrinsic value.

**Technical analysis** attempts to predict future price movements of a security based on historical data, such as price and volume. Technical analysis may involve using charts to identify recurring patterns and trends, but there is no guarantee that those patterns and trends will reoccur.

**Quantitative analysis** uses statistical models to estimate the impact of user-defined "factors" on a security's price movement and attempts to extrapolate future movements based on that analysis.

### Fund Management:

There are advantages and disadvantages to active and passive fund management styles. Some may

argue that passively-managed funds — generally low-cost funds that seek to track indexes such as the S&P 500 or the Russell 200 – are “better” while others may prefer actively-managed funds, where fund managers try to outperform the indexes, but this active management is generally more expensive than passive management.

**Passive Investment Management:** Passive funds (also known as passive index funds) are designed to replicate a given index in its composition of securities and seek to match the exact performance of the index they track. There is no manager or management team actively picking stocks or making buy and sell decisions, and therefore it should be expected that a passive fund is to experience all the upside and downside of the underlying index (before fund fees).

**Active Investment Management:** Active funds, in contrast, attempt to beat the index. Active managers generally follow economic, sector and company research and may use investment strategies such as market timing in their attempt to outperform the index. Active management comes at a cost, and therefore these funds are typically more expensive than index funds.

We primarily utilize both active and passive funds (including mutual funds and exchange traded funds) in client portfolios, and may also utilize, but not limited to, equity securities, U.S. government securities, corporate debt securities, municipal debt securities, alternatives (i.e., Real Estate, Commodities or Liquid Alternatives), and options. Cost, among other factors, is a factor we consider in screening and ultimately selecting an active or passive fund.

## **B. Investment Strategies We Use**

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Client portfolios are generally comprised of one or more BluePrint investment strategy (“Strategy”). Strategies vary in their level of risk tolerance, asset or specific asset class allocation, asset allocation style, investment approach, investment allocation style, and investment goals. BluePrint can make investment decisions specific to the Strategy while being able to efficiently evaluate these decisions across applicable client portfolios.

As ingredients, blending Strategies allows for a tailored portfolio providing the risk tolerance, asset allocation, investment allocation style, and diversity appropriate to each client. Further, as separate managed accounts, each client portfolio can be reviewed to evaluate how individual holdings may be within or out of tolerance as compared to its individual Strategy composition, and taxes as well as expenses can be considered prior to implementing any individual portfolio changes.

It is not required for clients to have a Strategy within their portfolio for our firm to provide Wealth Advisory services, however the use of Strategies is encouraged.

### **Strategy Allocation Styles:**

**Strategic Allocation Style:** Seeks to invest in a diversified portfolio with exposure to publicly traded securities in some or all of the following asset categories: Domestic and Foreign Stocks, Domestic and Foreign Bonds, and Alternatives (i.e., Real Estate, Commodities or Liquid Alternatives). Conservative Strategies may own more bond exposure than equities or alternatives. Moderate Strategies will generally own a reasonably balanced mix of different asset categories. Growth Strategies will generally own more equity exposure than bonds or alternatives. Strategic strategies may focus on current income (Yield) objectives or total return objectives depending on client needs or preference. In general, strategic strategies will tend to stay fully invested during all market cycles (commonly referred to as “buy-and-hold”). Strategic portfolios can be a mix of exchange-traded funds, individual equities or bonds, mutual funds or similar registered products.



**Tactical Allocation Style:** Seeks a primarily unconstrained approach to investment management and uses various research services and methodologies as the catalysts for making asset decisions.

*In market environments viewed positively*, these strategies may overweight ownership of growth assets such as stocks or commodities, subject to certain upper limit constraints dependent on the strategies risk objective. *In market environments viewed neutral or negative*, clients may be overweight in defensive asset classes such as fixed income, cash or inverse market exposure independent of selected risk objective, subject to certain lower limit constraints dependent on the strategies risk objective.

*For unconstrained asset class strategies*, asset allocation may shift between asset classes, such as Domestic and Foreign Stocks, Domestic and Foreign Bonds, Alternatives (i.e., Real Estate, Commodities including precious metals or Liquid Alternatives), and Cash (Money Markets and cash equivalents), as well as within asset classes. *For constrained asset class or asset class specific strategies*, which are to maintain only certain asset classes, allocation is generally viewed at a more micro level within the asset class, such as a strategy specific to fixed income may target exposure within emerging market bonds, treasury bonds, corporate bonds, high yield bonds, inflation-protected bonds, floating rate notes, first lien senior secured floating rate bank loans, U.S. nonconvertible preferred stock and other preferred securities, U.S. municipal bonds and U.S. convertible securities.

## Active or Passive Fund Management with Strategic or Tactical Allocation:

	STRATEGIC ALLOCATION	TACTICAL ALLOCATION
PASSIVE FUND MANAGEMENT	"Buy-and-hold" asset or specific asset class allocations with passive funds which try to match an index.	Changing asset or asset class allocation ownership into funds which try to match the index.
ACTIVE FUND MANAGEMENT	"Buy-and-hold" asset or specific asset class allocations with fund managers whom try to outperform an index.	Changing asset or asset class allocation ownership with fund managers whom try to outperform an index.

## Investment Approaches:

We use the following investment approaches in managing client accounts, provided that such approaches 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 may buy securities for your account and hold them for a relatively long time (more than a year) in anticipation that the security's value will appreciate over a long horizon. The risk of this approach is that we could miss out on potential short-term gains that could have been profitable to your account. Moreover, if our predictions are incorrect, it's possible that the security's value may decline sharply before we make a decision to sell.

**Short-Term Purchases:** We may buy securities for your account and decide to sell them within a relatively short time horizon (less than a year) in order to capitalize on short-term price fluctuations. There's no guarantee, however, that this approach will be able to produce gains.

**Trading:** We may buy securities for your account and sell them quickly (typically within 30 days) in order to take advantage of short-term price volatility. As with short-term purchases, there is no



guarantee that this approach will be able to produce gains.

**Short Sales:** We may employ a “short” in your account. “Shorting” involves borrowing and selling a security in anticipation of buying it in the future at a lower price to close out the position. The primary risk of shorting a security is that if it increases in value, it could result in a loss, and since the potential price appreciation of a security is theoretically unlimited, shorting can substantially increase the risk of a portfolio.

**Margin Transactions:** While not typical for clients, and if your account is set up for margin transactions, we may buy on margin for your account. Buying on margin is essentially borrowing money from a broker/custodian to purchase the security. Because using borrowed money amplifies gains and losses, buying on margin can substantially increase the risk of your portfolio. While this type of transaction may occur, it will only be employed for portfolios approved for Margin transactions.

**Option writing:** While not typical for clients, and if your account is set up and approved for options capabilities with the custodian, we may utilize options to enhance your portfolio returns and/or hedge risk. An option is a contract that gives the buyer the right, but not the obligation to buy or sell a security at a specific price on or before a certain date. We may use “covered call” writing strategies to generate income from selling an option against a security you own. We may also use call or put options to speculate on price movements on the underlying security. So called “naked calls or puts” may substantially increase the risk in your portfolio. This approach will only be used on portfolios clearly indicated for option utilization

## Individual Equity Selection:

Seeks to invest in a portfolio of individual stocks as opposed to fund-based investments. Individual equity Strategies may include a focus on the following types of objectives:

**Quality** – Seeks to invest in well-established, primarily large and mid-cap companies with a focus on fundamental factors deemed as quality, such as defined competitive advantage, good management, consistent and predictable cash flow, and good prospects for continued profitability and growth.

**Growth** – Seeks to invest in established, primarily large and mid-cap companies, similar to quality above but focused on a higher long-term growth profile. May own above average exposure to sectors such as technology, consumer discretionary, financials and healthcare.

**Dividend** – Seeks to invest in well-established, primarily large and mid companies, with a higher dividend than the average S&P 500 stock which also illustrate a track record of growing or maintaining the dividend. May own above average exposure to dividend focused areas such as Consumer Staples, Utilities, MLPs and REITS

**Trading** – Seeks a more a dynamic and active approach to ownership of equities with a timeframe in the weeks to months. Can focus on well-established and lesser known equities with a reasonable expectation for shorter term appreciation. Can also employ a stop loss mandate to help with risk management or profit taking.

## Transitioning to Strategies:

As BluePrint utilizes investment research that helps assess potential market risk, which may result in elevated cash or cash equivalent positions for extended periods of time, it is the responsibility of

BluePrint's Wealth Managers to have discussions with the client regarding the timing of investments into BluePrint Strategies. Dependent on client's preference, or our market outlook, clients can be transitioned to our strategies in a reasonable time (typically within 30 days of asset transfer/deposit) or over a mutually agreed upon transition period.

## **C. Risk of Loss**

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Investing in securities involves risk of loss that clients should be prepared to bear. While the stock market may increase and the account(s) could enjoy a gain, it is also possible that the stock market may decrease, and the account(s) could suffer a loss. It is important that clients understand the risks associated with investing in the stock market, are appropriately diversified in investments, and ask any questions.

The implementations of our Strategies for our clients may obtain different returns than the underlying indices or index benchmarks for several reasons, such as the use of different mutual funds, ETFs or underlying investment products depending on the client's unique situation.

## **D. Description of Material, Significant or Unusual Risks**

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Cash balances will generally be invested using the default custodial bank sweep feature, or invested in money market funds, FDIC Insured Certificates of Deposit (CDs), high-grade commercial paper and/or government-backed debt instruments, to help obtain higher levels of interest through relatively low-risk and conservative investments as operationally feasible. In most cases, at least a partial cash balance will be maintained so that BluePrint may debit advisory fees for our Wealth Advisory services as well as trading or any other administrative costs associated with client account(s). In the event there is an insufficient cash balance in the account to pay ongoing fees and expenses, positions may be liquidated to pay fees and expenses due.

## **ITEM 9: DISCIPLINARY INFORMATION**

There are no legal or disciplinary events that are material to the evaluation of our advisory business or the integrity of our management.

## **ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

### **A. Broker-Dealer Registration and Broker-Dealer Affiliations**

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Neither BluePrint Wealth Alliance LLC nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

### **B. Registration as Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

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Neither BluePrint Wealth Alliance LLC nor its representatives are registered as, or have pending applications to become, a futures commission merchant, commodity pool operator, or a commodity trading advisor.

## **C. Material Arrangements and Relationships**

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### **Tax Advice, Tax Preparation, and Accounting Services**

As described in further detail in Item 4 of this Brochure, in addition to wealth management and financial planning, BluePrint provides Tax Services to its clients. As a result, many of our clients receive such Tax Services from BluePrint's professionals in their separate licensed capacities and under a separate engagement agreement. As a result, BluePrint has the potential to receive two different forms of compensation from a client and has a financial incentive to recommend that clients receive Tax Services from BluePrint.

As described in more detail in Items 4 and 5 of this Brochure, BluePrint discounts its Tax Preparation fees for certain clients and, offers a greater discount for certain Wealth Advisory clients who meet specified criteria. To the extent that our clients specifically request accounting and/or tax preparation services, generally and where appropriate for a client's needs, we may recommend the Tax Services of BluePrint.

Our recommendation that a client engage BluePrint for Tax Services presents a conflict of interest which clients should be aware of. Some representatives of our firm are Certified Public Accountants. In such capacity, they also provide income tax preparation, tax advice, or accounting services. These services are independent of our financial planning and consulting, Wealth Advisory, and Retirement Planning and Consulting services and are governed under a separate engagement agreement. A conflict of interest exists as these services create an incentive for these representatives to recommend services based on the compensation they may receive. BluePrint seeks to mitigate this conflict by endeavoring to always act in the best interest of the client and clients are under no obligation to utilize any separate tax preparation, tax advice, or accounting services. Generally, clients should know the same services are available from other firms and may be offered at a lower cost.

### **Insurance Agents or Brokers**

Some representatives of the firm share common ownership interest in or are insurance agents of BluePrint Risk Management LLC. From time to time, in their separate licensed capacities, they may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. BluePrint seeks to mitigate this conflict by endeavoring to always act in the best interest of the client and clients are under no obligation to utilize the services of any representative in such individual's outside capacities.

Independent of BluePrint Risk Management LLC, some representatives of our firm are insurance agents or insurance brokers. They offer insurance products and may, in their separate licensed capacities, receive customary commissions as a result of insurance sales. A conflict of interest exists as these insurance sales creates an incentive to recommend products based on the compensation adviser and/or our supervised persons may earn. BluePrint seeks to mitigate this conflict by endeavoring to always act in the best interest of the client and clients are under no obligation to purchase insurance through our representatives.

## **D. Other Investment Advisors**

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Please see Item 4 above for more information about the selection of third-party money managers. The compensation paid to our firm by third party managers may vary, and thus, creates a conflict of interest in recommending a manager who shares a larger portion of its advisory fees over another manager. Prior to referring clients to third party advisors, our firm will ensure that third party advisors are

licensed, or notice filed with the respective authorities. A potential conflict of interest in utilizing third party advisors may be an incentive to us in selecting a particular advisor over another in the form of fees or services. In order to minimize this conflict our firm will make our recommendations/selections in the best interest of our clients.

## **ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

### **11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times.

#### **A. Code of Ethics:**

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Our fiduciary duty is the underlying principle for our firm's Code of Ethics, which includes procedures for personal securities transaction and insider trading. Our firm requires all representatives to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment with our firm, and at least annually thereafter, all representatives of our firm will acknowledge receipt, understanding and compliance with our firm's Code of Ethics. Our firm and representatives must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. If a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

Our firm recognizes that the personal investment transactions of our representatives demands the application of a Code of Ethics with high standards and requires that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, our firm also believes that if investment goals are similar for clients and for our representatives, it is logical, and even desirable, that there be common ownership of some securities.

In order to prevent conflicts of interest, our firm has established procedures for transactions effected by our representatives for their personal accounts. To monitor compliance with our personal trading policy, our firm requests quarterly securities and holdings transaction reports for all of our supervised persons.

#### **B. Securities of Material Financial Interest**

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Neither our firm nor a related person recommends, buys or sells for client accounts, securities in which our firm or a related person has a material financial interest without prior disclosure to the client.

#### **C. Securities of Clients and of Related Persons**

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Related persons of our firm may buy or sell securities and other investments that are also recommended to clients. To minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request.

## D. Client and Related Persons Securities Transactions

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Likewise, related persons of our firm buy or sell securities for themselves at or about the same time they buy or sell the same securities for client accounts. To minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request. Further, our related persons will refrain from buying or selling the same securities prior to buying or selling for our clients in the same day unless included in a block trade or executed at the end of the day.

## ITEM 12: BROKERAGE PRACTICES

### A. Broker-Dealer Selection

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Our firm does not maintain custody of client assets. Client assets must be maintained by a qualified custodian. Our firm seeks to recommend a custodian who will hold client assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. The factors considered, among others, are these:

- Timeliness of execution
- Timeliness and accuracy of trade confirmations
- Research services provided
- Ability to provide investment ideas
- Execution facilitation services provided
- Record keeping services provided
- Custody services provided
- Frequency and correction of trading errors
- Ability to access a variety of market venues
- Expertise as it relates to specific securities
- Financial condition
- Business reputation
- Quality of services

Our firm generally recommends the custodial services of TD Ameritrade Institutional a division of TD Ameritrade, Inc. ("TD Ameritrade") and Charles Schwab & Co., Inc. ("Schwab") member FINRA/SIPC. TD Ameritrade & Schwab are independent [and unaffiliated] SEC-registered broker-dealers. TD Ameritrade and Schwab offer services to independent investment Advisors which include custody of securities, trade execution, clearance, and settlement of transactions.

### Research and Other Soft Dollar Benefits

Our firm maintains relationships with and recommends the services of various qualified third-party broker-dealer custodians. In connection with these relationships, we may receive certain benefits. As further described below, such benefits may include research reports, services and seminars, computer software and other products and services to assist us in research and other facets of its day-to-day activities. Selecting a broker-dealer in recognition of the provision of services or products other than transaction execution is known as paying for those services or products with "soft dollars." BluePrint's receipt of soft dollar services and products benefit our firm since client brokerage fees are used to obtain such benefits and we do not have to produce or pay for the research, products or services. Consequently, our firm may have an incentive to select or recommend a broker-dealer based on these

benefits rather than in the clients' interest in receiving most favorable execution. These practices may also cause clients to pay fees that are higher than those that another qualified broker-dealer might charge to effect the same or similar transaction.

Some of these services are provided to BluePrint as part of a “bundled package” from the broker dealer. Our firm does not attempt to match a particular client’s trade executions with broker-dealers who have provided research services which have directly benefited that client’s portfolio. Rather, research services and other soft dollar benefits received by our firm are generally used for the ultimate benefit of all of its clients. Alternatively, some of the services may benefit only a specific segment of BluePrint’s clients.

To help mitigate the conflicts of interest created by our firm’s receipt of soft dollar benefits and to help ensure that broker-dealer custodians recommended by us are conducting overall best qualitative execution, we will periodically evaluate its trading process and brokers utilized. BluePrint will review the brokerage firm’s services, their value added to our investment process along with the broker’s ability to affect trades in a fair and timely manner at competitive commission rates. Accordingly, although we will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions. At that time brokerage firms not currently utilized will be considered for inclusion if we deem that such brokerage firms will significantly improve our firm’s overall management of client accounts.

## **Brokerage for Client Referrals**

BluePrint does not knowingly receive client referrals from a broker-dealer and therefore does not have an incentive to select or recommend a broker-dealer because of broker-dealer referred clients.

## **Directed Brokerage**

BluePrint does not allow a client to direct the Firm to execute all or a portion of client transactions through a specific broker (“Directed Brokerage”).

**Special Considerations for ERISA Clients:** A retirement or ERISA plan client may direct all or part of portfolio transactions for its account through a specific broker or dealer in order to obtain goods or services on behalf of the plan. Such direction is permitted provided that the goods and services provided are reasonable expenses of the plan incurred in the ordinary course of its business for which it otherwise would be obligated and empowered to pay. ERISA prohibits directed brokerage arrangements when the goods or services purchased are not for the exclusive benefit of the plan. Consequently, we will request that plan sponsors who direct plan brokerage provide us with a letter documenting that this arrangement will be for the exclusive benefit of the plan.

## **B. Aggregation of Purchase or Sale**

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We perform investment management services for various clients. There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our firm, which involve accounts with similar investment objectives. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when we believe that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and



availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation.

## ITEM 13: REVIEW OF ACCOUNTS AND FINANCIAL PLANS

BluePrint, through its Wealth Managers, investment team, or recommended sub-advisers, shall invest, and reinvest the securities, cash or other property held in the client's account in accordance with the client's investment objectives as identified by the client during initial interviews and information gathering sessions.

### Periodic Reviews

Our Chief Compliance Officer or delegated party will review the selection or mix of selected strategies and evaluate client suitability prior to investing client funds. Our Wealth Managers review client suitability information and accounts on at least an annual basis for our Wealth Advisory clients. The nature of these reviews is to learn whether client accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable.

Financial Planning clients and Wealth Advisory clients who have opted for Financial Planning do not receive reviews of their written plans unless they take action to schedule a financial consultation with us. Our firm does provide an option for ongoing financial planning and consulting services, and are willing to meet with such clients upon their request to discuss updates to their plans, changes in their circumstances, etc.

### Other Than Periodic Reviews

Our firm may review client accounts of Wealth Advisory clients more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc.

### Reports Provided to Clients

**Wealth Advisory** clients do not receive written reports, unless they've asked to do so. Verbal reports to clients take place on at least an annual basis.

**Financial Planning** clients generally receive a written financial plan within six (6) months of engagement, but do not receive written or verbal updated reports regarding their financial plans unless they separately engage our firm for a post-financial plan consultation.

**Consulting** clients do not generally receive written reports, as these engagements are more informal than Financial Planning engagements.

**Retirement Plan Consulting** clients receive reviews of their retirement plans for the duration of the service. Our firm also provides ongoing services where clients are met with upon their request to discuss updates to their plans, changes in their circumstances, etc. Retirement Plan Consulting clients do not receive written or verbal updated reports regarding their plans unless they choose to engage our firm for ongoing services.

## ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

### A. Other Economic Benefits to Our Firm

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#### **TD Ameritrade**

As disclosed above, our firm participates in TD Ameritrade's institutional customer program and we may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between our participation in the program and the investment advice we give our Clients, although our firm receives economic benefits through our participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving our participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to our firm by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by our firm's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit our firm but may not benefit our Client accounts. These products or services may assist us in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits received by our firm or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of our fiduciary duty to clients, we endeavor at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by our firm or our related persons in and of itself creates a potential conflict of interest and may indirectly influence our choice of TD Ameritrade for custody and brokerage services.

#### **Charles Schwab & Co., Inc.**

##### **Services that Benefit Clients**

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which our firm might not otherwise have access to or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit clients or their account(s).

##### **Services that May Not Directly Benefit Clients**

Schwab also makes available other products and services that benefit our firm but may not directly benefit clients or their accounts. These products and services assist in managing and administering our client accounts. They include investment research, both Schwab's and that of third parties. This research may be used to service all or some substantial number of client accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software



and other technology that:

- provides access to client account data (such as duplicate trade confirmations and account statements);
- facilitates trade execution and allocate aggregated trade orders for multiple client accounts;
- provides pricing and other market data;
- facilitates payment of our fees from our clients' accounts; and
- assists with back-office functions, recordkeeping and client reporting.

### **Services that Generally Benefit Only Our Firm**

Schwab also offers other services intended to help manage and further develop our business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

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

Irrespective of direct or indirect benefits to our client through Schwab, our firm strives to enhance the client experience, help clients reach their goals and put client interests before that of our firm or associated persons.

## **B. Compensation for Referral Fees**

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Our firm does not currently pay referral fees (non-commission based) to independent solicitors (non-registered representatives) for the referral of their clients to our firm.

Certain representatives of our firm may speak or appear in public settings, including live seminars and educational courses which may result in the acquisition of new or potential advisory relationships. We do not pay a referral fee to any such sponsor.

## **ITEM 15: CUSTODY**

Our firm will not have physical custody of client funds or securities and does not maintain custody through third party standing letters of authorizations (SLOAs) for its clients. Our firm may have custody through direct fee deduction of its advisory fee(s) from client accounts. All clients receive account statements directly from their qualified custodians at least quarterly upon opening of an account. If our firm decides to also send account statements to clients, such notice and account statements include a legend that recommends that the client compare the account statements received from the qualified custodian with those received from our firm. Clients are encouraged to raise any questions with us about the custody, safety or security of their assets and our custodial recommendations.

## ITEM 16: INVESTMENT DISCRETION

Wealth Advisory clients generally grant our firm with discretionary authority on their behalf, pursuant to an executed Wealth Advisory agreement. By granting investment discretion, our firm is authorized to execute securities transactions, determine which securities are bought and sold, and the total amount to be bought and sold. Limitations may be imposed by the client in the form of specific constraints on any of these areas of discretion with our firm's written acknowledgement.

## ITEM 17: VOTING CLIENT SECURITIES

Our firm does not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to our firm, our firm will forward them to the appropriate client and ask the party who sent them to mail them directly to the client in the future. Clients may call, write or email us to discuss questions they may have about particular proxy votes or other solicitations.

Third party money managers selected or recommended by our firm may vote proxies for clients. Therefore, except in the event a third-party money manager votes proxies, 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. Therefore (except for proxies that may be voted by a third-party money manager), our firm and/or the client shall instruct the qualified custodian to forward to copies of all proxies and shareholder communications relating to the client's investment assets.

## ITEM 18: FINANCIAL INFORMATION

Our firm is not required to provide financial information in this Brochure because:

- Our firm does not require the prepayment of more than \$1,200 in fees when services cannot be rendered within 6 months;
- Our firm does not take custody of client funds or securities; and
- Our firm does not have a financial condition or commitment that impairs our ability to meet contractual and fiduciary obligations to clients.

Our firm has never been the subject of a bankruptcy proceeding.