



## ***FAMILY OFFICE SERVICES***

Form ADV Part 2A

Disclosure Brochure

This Disclosure Brochure provides information about the qualifications and business practices of Strategic Blueprint, LLC ("Strategic Blueprint"), and describes the HFO Family Offices Services. If you have any questions about the contents of this Brochure, or would like more information about other services offered through Strategic Blueprint, please contact us at 678.954.4130. 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.

Strategic Blueprint is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Strategic Blueprint (CRD #284840) also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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March 28, 2019

## ITEM 2 – MATERIAL CHANGES

Strategic Blueprint, LLC (“Strategic Blueprint”) published the last annual update of its Part 2A *Disclosure Brochure*, Appendix 1 *Strategic Blueprint Advisor Directed Program Brochure* and Appendix 1 *Blueprint Design UMA Brochure* on March 28, 2018. The *Advisor Directed Program Brochure* was subsequently revised on April 6, 2018 with Item 1 below. This is the initial publication of the *Family Offices Services Brochure*.

Material Changes since the last annual updates include:

1. Public, non-traded interval funds and preferred stock of traded REITS, if available on the TD Ameritrade platform, are not excluded from discretionary trading in the *Advisor Directed Program*, where discretion is authorized by the account owner. You may restrict use of such investments in your account.
2. The Blueprint Design UMA Program has been discontinued.
3. Strategic Blueprint has added Family Offices Services, offered on a limited basis by certain Advisory Representatives conducting business as Hutchinson Family Offices. Please refer to the *Family Offices Services Brochure*, as well as the Part 2B *Supplements* of these Advisory Representatives.
4. Strategic Blueprint has added Subscription Advisory Services, through which an array of services are offered for a negotiated flat fee. Please refer to Item 4 of the Part 2A *Strategic Blueprint Disclosure Brochure*.

### Annual Update

We will provide you a Summary of Material Changes to this and subsequent Brochures within 120 days of the close of our business fiscal year (December 31). We will provide other ongoing disclosure information about material changes as necessary.

### Brochure Availability

We will provide our most current Brochure upon request at any time, without charge. Our Brochure may be requested by contacting our Chief Compliance Officer at 678.954.4130.

Additional information about Strategic Blueprint (CRD #126514) and its Advisory Representatives is available on the SEC’s web site at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## **ITEM 4 – ADVISORY BUSINESS**

### **DESCRIPTION OF BUSINESS, PRINCIPALS, AND TYPES OF SERVICES**

Strategic Blueprint, LLC (“Strategic Blueprint”) is an Investment Adviser registered with the Securities and Exchange Commission (“SEC”). Strategic Blueprint is an Atlanta-based, Georgia corporation, formed in July 2016, and a wholly-owned subsidiary of SFA Holdings, Inc. (“SFAH”). Clive Slovin is the President and CEO of SFAH.

Julie Sullivan, President, and LaRee Holloway, Controller and Vice President, are the Managers of Strategic Blueprint. David Pittman serves as Executive Vice President.

Strategic Blueprint is under common control with The Strategic Financial Alliance, Inc., MerCap Securities LLC, MerCap Advisors, Inc., SFA Insurance Services, Inc., Green Creek Resources, Inc., and Timbrel Capital LLC. Please refer to Item 10 of this Brochure for additional information about our affiliated companies.

Through its network of independent Advisory Representatives, Strategic Blueprint offers a range of advisory and wealth management services as described below, which are more fully described in the ADV Part 2A Disclosure Brochure and Appendix 1 Advisor Directed Program Brochure. These services include:

- Portfolio Management Programs
- Selection of and Referral to Third-Party Asset Managers
- Financial Planning
- Retirement Planning
- College Education Planning
- Family Wealth Planning
- Financial Consulting
- Education Events

Advisory Representatives will market their services under doing-business-as names (“DBAs”), as disclosed in their respective ADV Part 2B Supplements. They will use these DBAs and their respective logos in their marketing, reporting and communications.

As of December 31, 2018, Strategic Blueprint managed assets valued at approximately \$244.3 million on a discretionary basis.

### **FAMILY OFFICES SERVICES**

Advisory representatives, through Strategic Blueprint, doing business as Hutchinson Family Offices, offer an array of wealth management services to a small number of affluent families in a manner designed to simplify your complex financial lives.

The Advisory Representatives who conduct business as Hutchinson Family Offices (individually and collectively, Advisory Representative) work as a team to understand your family's current circumstances, goals, and unique needs through interviews, collection of information through financial profiles, review of tax returns and discussions with your tax and legal advisors.

Strategies are designed and implemented to help preserve and potentially grow your wealth, with special attention tax considerations and tactics.

Services that are designed to help affluent families include the following:

- Wealth Preservation Strategies
- Multi-generational wealth planning and education
- Private foundation structuring
- Philanthropic planning
- Private accounting and tax services
- Preparation of Financial Statements
- Non-Custodial Bill Paying
- Estate planning
- Asset acquisition
- Risk management

Investment management will be provided through a separate Investment Management Agreement. Please refer to the Appendix 1 *Advisor Directed Program Brochure*.

Advisory Representative will collaborate with your professional tax, legal and other advisors, with your authorization. The nature and frequency of reporting, meetings, written plans and other specific services are described and agreed upon in the Family Offices Agreement.

Strategic Blueprint does not provide tax advice or tax preparation. However, Hutchinson Family Offices has employed professionals, including Certified Public Accountants, who perform those services for Family Offices Services clients.

### **CLIENT TAILORED SERVICES AND CLIENT IMPOSED RESTRICTIONS**

Your Advisory Representative develops and recommends strategies and services based on the information you provide using his or her knowledge and experience. It is very important that you communicate changes in your information so your Advisory Representative can make recommendations and deliver services in a manner that is consistent with your financial and planning objectives.

## **ITEM 5 – FEES AND COMPENSATION**

### **FAMILY OFFICE SERVICES FEES AND COMPENSATION**

The Annual Flat Fee is negotiable and is based on the complexity and scope of your financial situation, including but not limited to your net worth, income, total investable assets, tax situation, number of accounts and account types, employment (i.e., self-employed or W2

employee), number of family members, trusts, current transitions, and any additional factors we determine that may add to the complexity of your financial life.

The annual flat fee is billed monthly (or quarterly, as specified in your Advisory Agreement, in advance and assessed pro rata depending on when services commence.

An initial negotiated fee of up to \$5,000 (separate from and in addition to the flat fee) may be assessed for the establishment of the services, including account openings, document review and an initial plan. This initial fee may be waived at the discretion of the Firm.

The initial fee and monthly fee will be invoiced or, with your authorization, deducted from a cash account established at TD Ameritrade. Fees will be reviewed annually and may increase or decrease based on certain factors such as the complexity of your financial situation. No fee increase will be effective until you sign a new or amended advisory agreement fee schedule.

Services may be terminated upon written notice to Strategic Blueprint. Any unearned fees will be promptly returned.

For complete fee details related to other services offered through Strategic Blueprint, please refer to the ADV Part 2A *Disclosure Brochure*, the *Appendix 1 Strategic Blueprint Advisor Directed Program Brochure*.

### **ADDITIONAL FEES, COMPENSATION AND EXPENSES**

The Family Office Fee does not include the costs associated with asset management, legal fees, insurance, due diligence on private investments, or implementing recommendations and strategies. Those services will be provided through agreements specific to the service with the respective service provider, or through product applications.

### **NEGOTIATION OF FEES AND COMPENSATION**

The Annual Flat Fee is negotiated on a case-by-case basis as stated above.

Please note that the same or similar services to those described above may be available to you elsewhere, or separately, at a lower cost. Your Advisory Representative may negotiate a fee that is more or less than fees negotiated by other Strategic Blueprint Advisory Representatives for similar services.

### **POTENTIAL CONFLICTS OF INTEREST**

In addition to providing Family Offices Services, Advisory Representatives can offer other advisory services (including investment management) as well as securities products and other investment and insurance products in their capacities as registered representatives of the Strategic Financial Alliance, Inc. (SFA) and as licensed insurance agents. SFA, and its registered representatives, will receive compensation in connection with this activity and the amount of compensation will depend on the type of product purchased. Advisory Representatives who are also registered representatives can have a greater financial incentive to recommend certain products as opposed to others. Your Advisory Representative will make

recommendations based on your stated investment objectives, risk tolerance, and time horizon. Security transactions executed through SFA are reviewed for suitability by a designated supervisor.

No commissions or 12b-1 fees are paid to Strategic Blueprint or your Advisory Representative on those securities recommended and purchased inside your Strategic Blueprint accounts.

Certain third-party asset managers with which Strategic Blueprint has entered into sub-advisory, co-advisory and/or solicitor's agreements provide marketing support to Strategic Blueprint and its Advisory Representatives for meetings and other functions. They may also provide software and other tools to assist our Advisory Representatives in providing services to you.

Sponsors and issuers of alternative investments and certain asset managers sponsor training and due diligence programs for Advisory Representatives. They may also provide marketing support to Strategic Blueprint, its affiliated companies, and Advisory Representatives for conferences, education, training and client appreciation events. You can obtain a list of those companies that provide marketing support by contacting the Chief Compliance Officer at 678.954.4130, or by emailing [info@strategicblueprint.net](mailto:info@strategicblueprint.net).

Your Advisory Representative may participate in conferences sponsored by SFAH affiliated companies. When attending such conferences, your Advisory Representative will receive non-cash compensation in the form of travel expenses, meals, and other services based on the amount of commissions and compensation earned through the SFAH affiliated companies.

Please be aware that you are under no obligation to purchase products or services recommended by us or your Advisory Representative. Your Advisory Representative will answer any questions you have about fees and expenses related to the products recommended. Additionally, Strategic Blueprint has adopted a *Code of Ethics*, as described in Item 11 of this Brochure, which describes the standard of conduct required of our Advisory Representatives.

If your Advisory Representative is also registered with SFA or is a licensed insurance agent, you are under no obligation to purchase securities and/or insurance products and services through him or her in that capacity. Neither are you obligated to purchase any products or services through SFAH affiliated companies.

If a conflict of interest exists between an Advisory Representative, employee, or related entity and any client or client's holdings, Advisory Representatives are responsible to disclose such conflicts to the Strategic Blueprint Compliance Department. The Compliance Department will determine the materiality of such conflicts. Material conflicts will be disclosed to you. You will be offered an opportunity to waive such conflicts, to work with another Advisory Representative, or to move your assets to another investment advisory firm.

Strategic Blueprint monitors for potential conflicts of interest through reviews of client accounts and reviews of Advisory Representatives' personal securities accounts and their outside

business activities. Any Advisory Representative knowingly placing personal interest above that of a client will be subject to disciplinary action, up to and including termination.

You will receive an ADV Part 2B Supplement with information about your Advisory Representative, including credentials, education and their specific conflicts of interest.

## **ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

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

Certain third-party asset managers may assess a performance-based fee, which will be described in the respective manager's disclosure brochure. A performance-based fee is deducted from your investment. In some cases, a portion of the performance fee may be shared with Strategic Blueprint and Advisory Representative(s) as a solicitor's fee. Any such arrangement will be described to you in a written Solicitor's Disclosure Statement.

## **ITEM 7 – TYPES OF CLIENTS**

Family Offices Services are offered to high networth individuals, families and their related, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and other business entities.

Strategic Blueprint generally requires a minimum net worth of \$5 million for Family Offices Services. This net worth threshold serves as a guideline, only. Strategic Blueprint, at its sole discretion, may waive this minimum net worth requirement.

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

Strategic Blueprint's Representatives will rely on various types of tools and methods to assist in recommending or selecting investment strategies to you, including asset allocation and various types of software. Strategic Blueprint's methods of analysis include charting analysis, fundamental analysis, technical analysis, and cyclical analysis. The main sources of information used to formulate investment advice and/or manage assets includes financial newspapers and magazines, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the SEC, and company press releases.

Your Advisory Representative generally uses fundamental analysis (micro), fundamental analysis (macro) and technical analysis in determining which securities are appropriate for a client account. The risks inherent in using fundamental analysis (micro) include overlooking



what is happening to the larger domestic or global economic environment. The risks inherent in using fundamental analysis (macro) include unforeseen price fluctuations of individual securities or industries that are not related to the overall domestic or global economic environment. The risks inherent in using technical analysis include relying on historical data to make predictions about future price movement which may not always follow historical patterns.

Various types of risk are involved when investing in securities. Economic risk, market risk, currency risk, inflation risk, liquidity risk, and credit risk are examples of the types of risks your account may be subject to. You should not invest in any product or program if you are not prepared to bear a potential loss.

Please refer to the *Advisor Directed Program Brochure* for more information about risks associated with certain investment types.

## **ITEM 9 – DISCIPLINARY INFORMATION**

Strategic Blueprint has no reportable disciplinary information.

On October 29, 2015, the Strategic Financial Alliance, Inc. (SFA), an affiliated company, entered into an Acceptance, Waiver and Consent with the Financial Industry Regulatory Authority (“FINRA”) concerning its supervision of and procedures related to consolidated reports. Without admitting or denying the allegations, SFA consented to a censure and a \$30,000 fine. SFA was also required to submit an attestation that it had implemented procedures which more fully addressed the supervision of consolidated reports.

Information about your Advisory Representative is available in his or her Supplement to this brochure, and at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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

Strategic Blueprint’s sole business purpose is as a registered investment adviser.

Strategic Blueprint does not offer tax or legal advice. When you enter into an agreement for the Family Offices Services, in addition to the advisory services provided, your Advisory Representative will work with Certified Public Accountants and other professionals who are associated with Hutchinson Family Offices to provide tax advice and tax services, such as preparation of tax documents and filing. Your Advisory Representative will work with those professionals to deliver the tax services. You will not be charged by Hutchinson Family Offices separately for the tax related services.

J. Steven Hutchinson, Amy Conley, Todd Walker, Sherry Campbell, and Ashley Wigglesworth are investment adviser representatives of Strategic Blueprint. They conduct their financial

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services business using the name Hutchinson Family Offices, which is otherwise unaffiliated with Strategic Blueprint. Divorce Consulting, Insurance Services and Tax Advice are not services of Strategic Blueprint.

Strategic Blueprint is wholly owned by SFA Holdings, Inc. (SFAH). SFAH also owns the Strategic Financial Alliance, Inc. (SFA), a registered broker-dealer, member of FINRA and SIPC, and an SEC-registered investment adviser. Strategic Blueprint shares office space, technology, including servers and email archiving, and employees with SFAH and SFA. Ms. Holloway is the Controller, Vice President and FINOP of SFA. Ms. Sullivan is the Senior Vice President of SFA.

SFA Partners is wholly owned by SFA Holdings, Inc. It provides services shared by SFA, Strategic Blueprint, and SFA Insurance Services, including human resources, marketing, recruiting, advisor relations, accounting and due diligence.

Certain individuals affiliated with Strategic Blueprint are also registered representatives of SFA. They may also associate as advisory representatives of SFA. SFA and its registered representatives offer securities and financial products in addition to rendering investment advice.

Representatives associated with Strategic Blueprint may also be licensed to sell insurance products with the states in which they do business, and are appointed by various insurance companies, including through Strategic Blueprint's affiliated insurance agency, SFA Insurance Services, Inc.

SFAH owns 50% of Green Creek Resources, LLC, a manager and sponsor of pooled investment programs. Green Creek Resources and Strategic Blueprint share office space. Ms. Holloway is also Secretary of Green Creek Resources.

Timbrel Capital LLC (Timbrel), member FINRA and SIPC, is a registered broker-dealer formed in 2019 and is wholly owned by SFAH. It provides wholesaling and consulting services to sponsors of alternative investments, including Reg D private offerings and unregistered public programs. Timbrel does not conduct business directly with retail investors. If your Advisory Representative recommends a program that is sponsored by a client of Timbrel, this fact will be disclosed to you.

Clive Slovin, President of SFAH and SFA, and certain Advisory Representatives are shareholders of SFAH, parent company of Strategic Blueprint. Shareholders will benefit from the profits accrued to SFAH from any of its subsidiaries in the form of dividends and enhanced stock value. SFAH offers stock options to employees, and to persons registered with SFA and/or Strategic Blueprint based on the revenues they produce.

Clients are under no obligation to purchase insurance products, securities products, or other products or services through SFA and its associated persons. While Strategic Blueprint and its Advisory Representatives endeavor at all times to put the interests of clients first as part of Strategic Blueprint's fiduciary duty, you should be aware that the receipt of additional compensation itself creates a conflict of interest and may potentially affect the judgment of these individuals when making recommendations.

MerCap Advisors, Inc. is wholly owned by SFAH, parent company of Strategic Blueprint. MerCap Advisors, Inc. ("MCA") is a state-registered investment adviser with its home office in Paoli, Pennsylvania. LaRee Hollaway is an officer and Director of MCA, and Julie Sullivan, is a Director.

In 2015, SFAH acquired MerCap Securities, LLC, a registered broker-dealer with its main office in Paoli, Pennsylvania. LaRee Hollaway is an officer and Director, and Julie Sullivan is a Director.

## ITEM 11 – CODE OF ETHICS

We have adopted a *Code of Ethics* ("Code") to address the standard of business conduct required of our Advisory Representatives and employees. The Code includes our policies and procedures developed to protect your interests in relation to the following:

- Duty at all times to place your interests ahead of ours;
- All personal securities transactions of our Advisory Representatives and employees must be conducted in a manner consistent with the Code and avoid any actual or potential conflict of interest, or any abuse of an Advisory Representative's or employee's position of trust and responsibility;
- Advisory Representatives may not take inappropriate advantage of their positions; and
- Information concerning the identity of your security holdings and financial circumstances is confidential and must be safeguarded.

We will provide a copy of the Code to you or any prospective client upon request.

We do not buy or sell securities for our own account that we also recommend to you. Our Advisory Representatives and employees are permitted to buy or sell the same securities for their personal and family accounts that are bought or sold for your account.

The personal securities transactions by our Advisory Representatives and employees may raise potential conflicts of interest when they trade in a security that is owned by you or is being considered for purchase or sale for your account.

We have adopted policies and procedures that are intended to address these conflicts of interest. These policies and procedures:

- Require our Advisory Representatives and employees to act in your best interest,
- Prohibit favoring one client over another, and
- Provide for the review of transactions to monitor that an Advisory Representative or employee does not place a trade in a personal or beneficial account in front of a client's transaction in the same security.

Our Advisory Representatives and employees must follow our procedures when purchasing or selling the same securities purchased or sold for your account.

## **ITEM 12 – BROKERAGE PRACTICES**

Strategic Blueprint does not maintain custody of client assets. All managed accounts will be custodied by TD Ameritrade Institutional, Division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC.

In addition to brokerage and custody services, TD Ameritrade provides access to research, software, and educational opportunities. TD Ameritrade may also make available or arrange for these types of services to be provided to us by independent third parties. It may discount or waive the fees it would otherwise charge for some of the services it makes available to us. It may also pay all or a part of the fees of a third party providing these services to us. Commissions and other fees for transactions executed through TD Ameritrade may be higher than commissions and other fees available if you use another custodian firm to execute transactions and maintain custody of your account. Fees assessed by TD Ameritrade will be disclosed to you in account opening documents.

Strategic Blueprint does not have soft dollar arrangements wherein commissions are used to pay for research.

Please refer to the *Advisor Directed Program Brochure* for more information.

## **ITEM 13 – REVIEW OF ACCOUNTS**

Security purchases and sales effected by our representative in your account is monitored for suitability by a designated supervisor. Advisory Representatives review advisory accounts with you at least annually. Transactions in the accounts are reviewed on an ongoing basis. Interim reviews may be triggered by changes in political, economic or market conditions or if there are changes in your stated financial profile.

Reviews for financial plans occur upon the engagement as part of the financial planning process. The extent of reviews depends on the arrangement with you. Thereafter, reviews are conducted according to the financial planning agreement. Financial planning clients receive a financial plan in the agreed upon form upon completion of the plan. Updates to the financial plan and subsequent reviews are conducted as determined by advisor and client as outlined in the Financial Planning Agreement.

Strategic Blueprint's Advisory Representatives render investment advisory services to clients using different methods. Advisory Representatives may offer any or all of the advisory services described in the firm's Brochures. Strategic Blueprint instructs each Advisory Representative that manages accounts to review accounts with their clients, at least annually, as to suitability of the portfolio relative to stated financial needs and objectives, and to determine what action, if any, is indicated. Broader reviews are performed periodically by the Advisory Representative's designated supervising principal and/or the Strategic Blueprint Compliance Department, or their qualified designees.

TD Ameritrade, as custodian of your managed account(s) provides quarterly brokerage account statements. You will also receive monthly statements for those months in which there is activity in your account. Please review your statements carefully to make sure that your account is being managed according to your stated objectives. Your statement will also show the amount of any advisory fee deducted from your account.

Performance reports for your managed account(s) will be made available as agreed upon between you and your Advisory Representative.

Third-party asset managers to which Strategic Blueprint has referred clients provide statements and performance reports to clients, monthly or quarterly, based on the TPAM's disclosure brochure and their agreement with the client.

## **ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION**

### **OTHER COMPENSATION**

In certain instances, product sponsors, investment companies, and third-party asset managers ("product sponsors") may participate in activities that are designed to help facilitate the distribution of their products, such as marketing activities and educational programs, and by offsetting expenses that result from the cost of conducting initial and on-going due diligence on their products. In return for assistance in facilitating the activities described above, Strategic Blueprint may receive additional compensation from product sponsors in the form of marketing allowances and due diligence fees. SFA, an affiliated company, may also receive marketing support and other financial benefits from product sponsors and third-party managers. Advisory Representatives may indirectly share in non-cash benefits when that additional compensation is used by Strategic Blueprint and/or SFA for conferences or meetings.

However, Strategic Blueprint does not recommend these products over others. These companies may have greater access to our representatives to provide training, education presentations and product information. And this additional compensation may give rise to a financial incentive for Strategic Blueprint to recommend these products over other products where such financial incentives are not present.

While Strategic Blueprint and its Advisory Representatives endeavor at all times to put the interests of our clients first, you should be aware that the receipt of additional compensation itself creates a conflict of interest and may potentially affect the judgment of these individuals when making recommendations. Additionally, because of the revenue sharing arrangements referenced above, though they do not impact advisor compensation, Advisory Representatives may prefer recommending products offered by a sponsor who is participating in the revenue sharing program over other products and money managers available through Strategic Blueprint. Please contact Strategic Blueprint at 678.954.4130 for additional information about revenue sharing arrangements.

Strategic Blueprint may receive certain economic benefits as a result of our participation in the institutional brokerage program of TD Ameritrade. These benefits include products and services that assist us in managing and administering client accounts, including access to investments generally available to institutional investors, software, technology, and research. The availability of the custodians' products and services is based solely on our participation in their programs, and not on the provision of any particular investment advice.

## **CLIENT REFERRALS**

Strategic Blueprint enters into written agreements with certain unaffiliated investment advisers and other professionals (such as CPAs, attorneys, etc.) to compensate them for referring clients to us. We will pay these individuals (referred to as "solicitors") a percentage of the advisory fee that you pay us if it is determined that you have become a client of ours as a result of their direct or indirect efforts.

The payments we make to a solicitor will not result in an increase in the amount of the advisory fee that you pay.

Additionally, we also enter into written agreements through which Strategic Blueprint serves as a solicitor to other investment advisers. Strategic Blueprint (and, in turn, your Advisory Representative) will receive a portion of the advisory fee as a solicitor's or referral fee when you enter into an advisory agreement with a third-party asset manager as a result of your Advisory Representative's recommendation.

Our solicitation or referral arrangements will comply with applicable laws that govern:

- the nature of the services provided;
- the fees to be paid;
- disclosure of solicitor arrangements to clients; and
- client consents, as required.

Any solicitor's fee will be fully described in a written Solicitor's Disclosure Statement which you will receive and acknowledge when you enter into an advisory agreement.

## **ITEM 15 – CUSTODY**

Strategic Blueprint does not maintain physical custody of client assets. We will be deemed to have custody when you authorize us to deduct advisory fees directly from your account. Strategic Blueprint may only deduct fees with your written authorization, and the amount of any advisory fee deducted is shown on your account statement. You will receive at least quarterly statements from the account custodian. Strategic Blueprint urges you to carefully review such statements and compare this official custodial record to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Where there are differences, you should rely on the values disclosed in the custodial account statements.

Strategic Blueprint is also deemed to have custody when you execute a Standing Letter of Authorization (SLOA) which allows your Financial Advisor to request disbursements to be sent from your account to payees as specified by you in the SLOA at designated addresses or to designated account numbers. You will receive notifications from the account custodian when such a disbursement is made. Annually, the custodian will send a notification to you to confirm the SLOAs which you have authorized.

By limiting the manner in which we are deemed to have custody, Strategic Blueprint is not subject to a surprise audit requirement.

## **ITEM 16 – INVESTMENT DISCRETION**

If you enter into an Investment Management Agreement, we will manage your accounts on a discretionary or non-discretionary basis. We will only manage your account on a discretionary basis upon obtaining your written consent. Your consent is typically granted and evidenced in the executed Investment Management Agreement. We define discretion as the authority to trade your account, without obtaining your prior consent, to select the securities and amount of securities to be bought or sold, and the timing of the purchase or sale. It does not extend to the withdrawal or transfer of your account funds.

We may give advice and take action in the performance of our duties to you which differs from advice given, or the timing and nature of action taken, with respect to other clients' accounts.



## **ITEM 17 – VOTING CLIENT SECURITIES**

As a matter of firm policy and practice, Strategic Blueprint does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Strategic Blueprint may provide advice to clients regarding the clients' voting of proxies. You will receive information about proxies directly from your account custodian.

## **ITEM 18 – FINANCIAL INFORMATION**

Strategic Blueprint has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.