

MONTIS

FINANCIAL, LLC

Independence. Objectivity. Value.

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March 24, 2022

FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of Montis Financial, LLC. If you have any questions about the contents of this brochure, please contact us at (781) 541-5057 or via email at hpitt@montisfinancial.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Please note, where this brochure may use the terms "registered investment adviser" and/or "registered", registration itself does not imply a certain level of skill or training.

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

Item 2 Material Changes

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

ANY QUESTIONS: Montis' Chief Compliance Officer, Jon Ullman, remains available to address any questions regarding any portion of this Brochure.

Since our last annual updating amendment, dated March 15, 2021, we have the following material changes to report.

- We have amended the *Investment Advisory Business* section of this brochure to disclose Montis HoldCo LLC as the owner of Montis Financial, LLC.
- The *Investment Advisory Business* and *Fees and Compensation* sections have been updated to reflect that we offer Retirement Plan Consulting Services to clients.
- We amended the *Fees and Compensation* section to include a new tiered fee schedule for contracts signed after 3/31/2022 for Comprehensive Planning & Asset Management Services.

In addition, we have made the following material changes, in the form of additional disclosures, under the *Advisory Business* section:

IRA Rollover Recommendations

Please Note: Retirement Rollovers-Potential for Conflict of Interest: A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences).

When Montis provides investment advice regarding your retirement plan or individual retirement account, it does so as a fiduciary within the meaning of Section 3(21) of ERISA and/or the Internal Revenue Code (with respect to Individual Retirement Accounts ("IRAs")), as applicable, which are laws governing retirement accounts. Furthermore, when we provide these services on a discretionary basis, we do so in our capacity as an investment manager, as that term is defined under Section 3(38) of ERISA.

The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. We are also required to disclose any material conflicts of interest applicable to our services. For example, if Montis recommends that a client roll over their retirement plan assets into an account to be managed by Montis, such a recommendation creates a conflict of interest if Montis will earn new (or increase its current) compensation as a result of the rollover. If Montis provides a recommendation as to whether a client should engage in a rollover or not (whether it is from an employer's plan or an existing IRA), Montis is acting as a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. No client is under any obligation to roll over retirement plan assets to an account managed by Montis, whether it is from an employer's plan or an existing IRA. Montis' Chief Compliance Officer, Jon Ullman, remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.

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Item 4 Investment Advisory Business

Established in 2012, Montis Financial, LLC ("Montis") provides investment advice to clients through a combination of financial planning and investment asset management services. Montis is owned by Montis HoldCo LLC.

Comprehensive Planning & Asset Management Service

Clients with \$2 million or more in assets may receive our comprehensive planning and asset management service, tailored specifically to a client's investment needs. We work with you to assess a variety of personal factors including your goals and objectives, sources of income, insurance and estate needs, asset distribution and risk tolerance. We then develop a financial plan which may include an analysis of your current assets, risk management, financial independence, retirement planning, estate planning, asset allocation and diversification. Once we deliver your financial plan to you, we work with you to determine the best asset management strategy and investments to implement this plan. The investments we may recommend include short-term cash instruments, mutual funds, money managers, limited partnerships, real estate investment trusts (often known as REITs), government securities, corporate/municipal debt (bonds) and equity securities (stocks). You may impose restrictions on our services at any time.

Montis also offers comprehensive planning and asset management services to clients regarding assets on which Montis does not provide continuous and regular supervisory or management services. These assets, known as "assets under advisement", are maintained at the issuer or custodian designated by the product sponsor, and may include, but are not limited to, certain variable annuity products, 529 college savings plans, limited partnerships, and individual employer-sponsored retirement and deferred compensation plans. For these assets, while Montis may provide asset management recommendations, Montis does not have the authority to place transactions. In such situations, the client will be responsible for arranging the transactions.

Retirement Plan Consulting Services

Montis provides retirement plan consulting/management services, pursuant to which it assists sponsors of self-directed retirement plans organized under the Employee Retirement Security Act of 1974 ("ERISA"). The terms and conditions of the engagement shall be set forth in a Retirement Plan Services Agreement between Montis and the plan sponsor.

In providing these services, Montis can assist with the selection and/or monitoring of investment options (generally open-end mutual funds) from which plan participants shall choose in self-directing the investments for their individual plan retirement accounts. Montis provides these services in its capacity as an ERISA Section 3(21) fiduciary. To the extent requested by the plan sponsor, Montis may also create specific asset allocation models, from which plan participants may choose in managing their individual retirement accounts. To the extent Montis provides these services on a discretionary basis, it does so in its capacity as an ERISA Section 3(38) investment manager.

Other Consultative Services

Upon request, we evaluate portfolios, and offer specific recommendations about investment strategy, asset allocation, and diversification separate from our comprehensive planning and asset management service described above. We may also provide our comprehensive and integrated financial planning analysis at an hourly rate.

For certain clients such as institutional accounts, trusts, retirement plans and individual clients seeking only investment consulting and portfolio monitoring services, we perform third-party money manager searches and consulting on mutual funds independently of the comprehensive and integrated financial plan described above. Should we recommend a third-party investment adviser to manage all, or a portion of, a client's assets, the client will be required to enter into a separate written agreement with the third-party adviser, and as described below, the third-party adviser's fees will be charged separately from our fees.

IRA Rollover Recommendations

Please Note: Retirement Rollovers-Potential for Conflict of Interest: A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences).

When Montis provides investment advice regarding your retirement plan or individual retirement account, it does so as a fiduciary within the meaning of Section 3(21) of ERISA and/or the Internal Revenue Code (with respect to Individual Retirement Accounts ("IRAs")), as applicable, which are laws governing retirement accounts. Furthermore, when we provide these services on a discretionary basis, we do so in our capacity as an investment manager, as that term is defined under Section 3(38) of ERISA.

The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. We are also required to disclose any material conflicts of interest applicable to our services. For example, if Montis recommends that a client roll over their retirement plan assets into an account to be managed by Montis, such a recommendation creates a conflict of interest if Montis will earn new (or increase its current) compensation as a result of the rollover. If Montis provides a recommendation as to whether a client should engage in a rollover or not (whether it is from an employer's plan or an existing IRA), Montis is acting as a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. No client is under any obligation to roll over retirement plan assets to an account managed by Montis, whether it is from an employer's plan or an existing IRA. Montis' Chief Compliance Officer, Jon Ullman, remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.

Assets Under Management

As of December 31, 2021, we provide continuous management services for \$746,100,000 in client assets on a discretionary basis, and \$2,100,000 in client assets on a non-discretionary basis. We also manage \$20,700,000 in client assets on a non-continuous basis.

Miscellaneous

Limitations of Financial Planning and Non-Investment Consulting/Implementation Services.

Montis will generally provide financial planning, and related consulting services regarding non-investment related matters, such as tax and estate planning, insurance, etc. inclusive of its advisory fee set forth at Item 5 below (exceptions may occur based upon assets under management, special projects, etc. for which Firm may charge a separate fee, or a stand-alone financial planning engagement). **Please Note:** Montis **does not** serve as an attorney (although Montis' Executive Chair, Christopher Dalto, is a licensed attorney, he does not provide legal services, and no attorney-client privilege is created as result of a client's engagement of Montis), accountant, or insurance agent, and no portion of our services should be construed as same. Accordingly, Montis **does not** prepare estate planning documents, tax returns, or sell insurance products. To the extent requested by a client, we may recommend the services of other professionals for non-investment implementation purpose (i.e. attorneys, accountants, insurance, etc.). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Montis and/or its representatives.

Please Note: If the client engages any recommended unaffiliated professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. At all times, the engaged licensed professional[s] (i.e. attorney, accountant, insurance agent, etc.), and **not** Montis, shall be responsible for the quality and competency of the services provided.

Please Note: Retirement Rollovers-Potential for Conflict of Interest: A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If Montis recommends that a client roll over their retirement plan assets into an account to be managed by Montis, such a recommendation creates a conflict of interest if Montis will earn new (or increase its current) compensation as a result of the rollover. When acting in such capacity, Montis serves as a fiduciary under the Employee Retirement Income Security Act (ERISA), or the Internal Revenue Code, or both. **No client is under any obligation to rollover retirement plan assets to an account managed by Montis. Montis' Chief Compliance Officer, Jon Ullman, remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.**

Please Note-Use of Mutual and Exchange Traded Funds: Most mutual funds and exchange traded funds are available directly to the public. Thus, a prospective client can obtain many of the funds that may be utilized by Montis independent of engaging Montis as an investment adviser. However, if a prospective client determines to do so, he/she will not receive Montis' initial and ongoing investment advisory services. **Please Also Note:** In addition to Montis' investment advisory fee described below, and transaction and/or custodial fees discussed below, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses).

Independent Managers. Montis may allocate a portion of a client's investment assets among unaffiliated independent investment managers in accordance with the client's designated investment objective(s). In such situations, the Independent Manager[s] shall have day-to-day responsibility for the active discretionary management of the allocated assets. Montis shall continue to render investment supervisory services to the client relative to the ongoing monitoring and review of account

performance, asset allocation and client investment objectives. Factors which Montis shall consider in recommending Independent Manager[s] include the client's designated investment objective(s), management style, performance, reputation, financial strength, reporting, pricing, and research. **Please Note:** The investment management fee charged by the Independent Manager[s] is separate from, and in addition to, Montis' advisory fee as set forth in the fee schedule at Item 5 below.

Custodian Charges-Additional Fees: As discussed below at 12 below, when requested to recommend a broker-dealer/custodian for client accounts, Montis generally recommends that Schwab and/or Fidelity serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as Schwab and Fidelity charge transaction fees for effecting securities transactions. In addition to Montis' investment advisory fee referenced in Item 5 below, the client will also incur transaction fees to purchase securities for the client's account (i.e., mutual funds and exchange traded funds, purchased by Montis for the client's account, and individual equity and fixed income securities purchased by Montis or any underlying Independent Manager). **ANY QUESTIONS: Montis' Chief Compliance Officer, Jon Ullman, remains available to address any questions that a client or prospective client may have regarding the above.**

Client Retirement Plan Assets. If requested to do so, Montis shall provide investment advisory services relative to the client's 401(k) plan assets. In such event, unless otherwise agreed upon, Montis shall recommend that the client allocate the retirement account assets among the investment options available on the 401(k) platform. Montis shall be limited to making recommendations regarding the allocation of the assets among the investment alternatives available through the plan. Montis will not receive any communications from the plan sponsor or custodian, and it shall remain the client's exclusive obligation to notify Montis of any changes in investment alternatives, restrictions, etc. pertaining to the retirement account.

Portfolio Activity. Montis has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, Montis will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when Montis determines that changes to a client's portfolio are neither necessary nor prudent. Of course, as indicated below, there can be no assurance that investment decisions made by Montis will be profitable or equal any specific performance level(s).

Client Obligations. In performing our services, Montis shall not be required to verify any information received from the client or from the client's other professionals and is expressly authorized to rely thereon. Moreover, it remains each client's responsibility to promptly notify Montis if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising our previous recommendations and/or services.

Please Note: Investment Risk. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Montis) will be profitable or equal any specific performance level(s).

Item 5 Fees and Compensation

Comprehensive Planning & Asset Management Service (For contracts signed before 3/31/2022)

We charge an asset-based fee for this service, which covers both financial planning and investment management services. Fees are charged quarterly, in advance, based on the fee schedule below. We calculate our fee twice per year, in December and June, based upon the total amount of assets held in accounts as agreed upon in writing, which may include assets under advisement as described in Item 4 above.

<u>TOTAL ASSETS BETWEEN</u>	<u>ANNUAL % FEE</u>
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\$0 and \$3,000,000	1.00%
\$3,000,001 and \$5,000,000	0.80%
\$5,000,001 and \$7,500,000	0.70%
\$7,500,001 and \$10,000,000	0.60%
\$10,000,001 and \$15,000,000	0.55%
\$15,000,001 and \$20,000,000	0.50%
\$20,000,001 and \$30,000,000	0.48%
(Negotiable thereafter)	

For whichever "band" shown above that your asset total falls into, Montis will use the corresponding annual percentage fee over the entire value to calculate your fee. We do not use tiered pricing.

We do not adjust our fees for contributions or withdrawals you make to your existing account(s) during the billing cycle. We deduct our fees, at the beginning of the applicable period, from your account(s), unless we have agreed to another payment arrangement. Should you terminate your arrangement with us, you will receive a prorata refund of fees collected for services not rendered. With some exceptions, there is a minimum total asset size of \$2,000,000. We may reduce or waive our fees from time to time in our discretion. See disclosure at Item 7 below.

Fees are negotiable and your fees may vary slightly from the above schedule based upon a combination of factors, including but not limited to the market value of your assets, the complexity of the engagement, the level and scope of the overall investment advisory services to be rendered, and negotiations. Similarly situated clients could pay diverse fees, and the services to be provided by Montis to any particular client could be available from other advisers at lower fees.

Comprehensive Planning & Asset Management Service (For contracts signed after 3/31/2022)

We charge an asset-based fee for this service, which covers both financial planning and investment management services. Fees are charged quarterly, in advance, based on the fee schedule below. We calculate our fee twice per year, in December and June, based upon the total amount of assets held in accounts as agreed upon in writing, which may include assets under advisement as described in Item 4 above.

The Montis advisory fee shall be based upon a percentage (%) of the market value of assets placed under Montis' advisement per the tiered fee schedule as follows:

TOTAL ASSETS BETWEEN	ANNUAL% FEE
\$0 to \$3,000,000	1.00%
Next \$2,000,000 (\$3,000,001 and \$5,000,000)	0.80%
Next \$2,500,000 (\$5,000,001 and \$7,500,000)	0.70%
Next \$2,500,000 (\$7,500,001 and \$10,000,000)	0.60%
Next \$5,000,000 (\$10,000,001 and \$15,000,000)	0.55%
Next \$5,000,000 (\$15,000,001 and \$20,000,000)	0.50%
Next \$10,000,000 (\$20,000,001 and \$30,000,000)	0.48%
(Negotiable thereafter)	

We do not adjust our fees for contributions or withdrawals you make to your existing account(s) during the billing cycle. We deduct our fees, at the beginning of the applicable period, from your account(s), unless we have agreed to another payment arrangement. Should you terminate your arrangement with us, you will receive a prorata refund of fees collected for services not rendered. With some exceptions, there is a minimum total asset size of \$2,000,000. We may reduce or waive our fees from time to time in our discretion. See disclosure at Item 7 below.

Fees are negotiable and your fees may vary slightly from the above schedule based upon a combination of factors, including but not limited to the market value of your assets, the complexity of the engagement, the level and scope of the overall investment advisory services to be rendered, and negotiations. Similarly situated clients could pay diverse fees, and the services to be provided by Montis to any particular client could be available from other advisers at lower fees.

Retirement Plan Consulting Services

If a client determines to engage Montis Advisors to provide retirement plan consulting services, the Montis advisory fee shall be based upon a percentage (%) of the market value of assets placed under Montis' advisement per a tiered fee schedule as follows:

Total Plan Assets Between	Annual Fee
Initial \$3,000,000	0.80%
Next \$2,000,000 (\$3,000,001 and \$5,000,000)	0.60%
Next \$5,000,000 (\$5,000,001 and \$10,000,000)	0.50%
Next \$10,000,000 (\$10,000,001 and \$20,000,000)	0.40%
Next \$10,000,000 (\$20,000,001 and \$30,000,000)	0.35%
Above \$30,000,00	0.30%
<i>Subject to a \$10,000 minimum annual fee</i>	

Please Note: In the event that the plan is subject to an annual minimum fee, the plan could pay a higher percentage fee than the 0.80% referenced above.

Montis, in its sole discretion, may charge a lesser fee based upon certain criteria (i.e., anticipated future additional assets, dollar amount of assets in the plan, related plans, plan composition, prior fee schedules, competition, negotiations with client, etc.). Please Note: As result of the above, similarly situated plans could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees.

If permitted by a retirement plan's governing documents, plan clients may elect to have their fees deducted from plan assets. Both Montis' Retirement Plan Services Agreement and the custodial/clearing agreement may authorize the custodian to debit the account for the amount of Montis' fee and to directly remit that fee to Montis in compliance with regulatory procedures. In the limited event that Montis bills the client directly, payment is due upon receipt of Montis' invoice. Unless otherwise agreed, Montis shall deduct fees and/or bill clients quarterly in advance. We calculate our fee twice per year, in December and June, based upon the market value of the plan assets.

The Retirement Plan Services Agreement between Montis and the client will continue in effect until terminated by either party upon written notice in accordance with the terms of the Retirement Plan Services Agreement. If an engagement is terminated, and the effective date of termination is in the middle of a fee period, Montis will either refund the prepaid but unearned portion of the client's fee (for plans paying in advance) or assess a final quarterly fee, prorated through the effective date of termination (for plans paying in arrears). Montis reserves the right to waive this final prorated fee, at its sole discretion.

Other Consultative Services

As described in Item 4 above, upon request, we evaluate portfolios, and offer specific recommendations about investment strategy, asset allocation, and diversification separate from our comprehensive planning and asset management service described above. We charge an hourly rate for this service and typically require pre-payment of a portion of the estimated amount before performing these services.

We may also provide our comprehensive and integrated financial planning analysis at an hourly rate and typically require pre-payment of a portion of the estimated amount before performing these services.

Our standard hourly rate is \$350/hour. Rates may be modified at our discretion and will be agreed upon in writing.

From time to time, when we reasonably determine it is in the best interest of the client (i.e., based upon the amount of assets to be invested, the non-availability of a lower share class option, etc.), we may recommend and/or utilize "No Transaction Fee" funds through Schwab or Fidelity. You should be aware that in order to be considered a No Transaction Fee fund, mutual fund companies will pay money to Schwab or Fidelity which in turn may increase the annual fund expenses you pay for these "No Transaction Fee" funds. We do not receive any compensation that Schwab or Fidelity receives from a mutual fund company.

Unless you direct us otherwise or have unique individual circumstances, we will generally recommend that Schwab, Fidelity or NATC (see disclosure at Item 10 below) serve as the broker-dealer or custodian for your investment management assets. Broker-dealers such as Schwab and Fidelity charge brokerage commissions and/or transaction fees for effecting certain securities transactions. Usually transaction fees correspond to investments like no-load mutual funds and commissions relate to individual equity and fixed income securities transactions. Mutual funds and exchange traded funds impose their own management fees and other fund related expenses which you will also bear in addition to our fees and any brokerage commissions and/or transaction fees.

Item 6 Performance-Based Fees and Side by Side Management

We do not charge performance-based fees.

Item 7 Types of Clients

Our clients include individuals, high net worth individuals, and professional associations.

We generally require a minimum asset level of \$ 2,000,000 for our services.

Montis, in its sole discretion, may waive or modify its minimum asset level, charge a lesser investment advisory fee and/or charge an hourly rate based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, competition, negotiations with client, etc.). **Please Note:** As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. **ANY QUESTIONS: Montis' Chief Compliance Officer, Jon Ullman, remains available to address any questions that a client or prospective client may have regarding advisory fees.**

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

Our main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases. We also rely on third-party data and analysis providers for both printed and online reports and analysis. Such providers include Morningstar, Valueline, and Frontier Analytics.

Your investment strategy is based upon the objectives you state to us during consultations.

You should be aware that different types of investments and strategies involve differing degrees of risk. You should not assume that future performance of any of your specific investments or investment strategy, including those we recommend, will be profitable or equal any specific performance levels. Any investment or investment strategy involves some risk of loss you should be prepared to bear. Examples of risk you could face are:

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, market values of bonds decline when interest rates rise because the rising rate makes the existing bond yields less attractive.
- *Market Risk:* External factors independent of a security's particular underlying circumstances may impact its price. The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions such as a political or social event or an economic condition.
- *Inflation Risk:* Inflation means a dollar today will not buy as much as a dollar next year. When any type of inflation is present your purchasing power decreases at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. Also known as exchange rate risk, these risks may be present in international mutual funds for example.
- *Reinvestment Risk:* The risk that future proceeds from investments may be reinvested at a potentially lower rate of return is reinvestment risk. This risk primarily relates to fixed income securities.
- *Business Risk:* Risks associated with a particular industry or a specific company may impact

the value of investments. For example, oil-drilling companies have more business risk than electric companies since they depend on finding oil and then refining it efficiently before they may generate a profit. An electric company generates steady income customers who buy electricity no matter what the economic environment is like.

- *Liquidity Risk*: Liquidity means the ability to readily convert an investment into cash. Assets with a lot of interest from purchasers are generally more liquid. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk*: A company with excessive borrowing to finance a business' operations increases the risk of profitability they may be unable to meet loan obligations during periods of financial stress.

Our methods of analysis and investment strategies do not present any significant or unusual risks. However, every method of analysis has its own inherent risks. We rely upon current and new market information to help perform accurate market analysis for you, but we have no control over how quickly or how often that market information is communicated. As a result, our analysis may incorporate outdated market information resulting in us providing a limited analysis to you. You should also remember that any market analysis can only produce a forecast of the direction of market values. There are no assurances or guarantees that any forecast will materialize and present profitable investment opportunities.

Item 9 Disciplinary Information

Our firm has not been the subject of any disciplinary actions.

Item 10 Other Financial Industry Activities and Affiliations

Montis' employee, Christiane Delessert, is a shareholder of National Advisor Holdings, Inc. ("NAH"). Ms. Delessert owns less than 2.0% of the outstanding stock of NAH. NAH has chartered an institution through the Office of Thrift Supervision known as National Advisers Trust Company ("NATC"). NATC provides custody, banking, and trust services to clients of registered investment advisory firms across the United States, such as Montis. Because Ms. Delessert, has an ownership interest in NAH, and therefore indirectly has an interest in NATC, a **conflict of interest** is present because Montis could have an economic incentive to recommend NATC's services. Montis may, and does, recommend NATC to certain clients for custody and trustee services when Montis believes NATC's services may be appropriate for those clients. No client is under any obligation to use NATC's services. **ANY QUESTIONS: Montis' Chief Compliance Officer, Jon Ullman, remains available to address any questions regarding NATC and the corresponding conflict of interest.**

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

We maintain a written code of ethics, in accordance with the Advisers Act, that is intended to create an ethical culture for our firm. Our code of ethics requires our employees to comply with federal securities laws, safeguard material non-public information and to report their personal securities holdings. Our code sets forth standards of business conduct required from our employees when dealing with our clients. Employees are required to treat sensitive information with confidentiality and are forbidden to misuse any such information. We will provide a copy of our code of ethics upon request.

We typically do not recommend clients purchase securities in which our firm or employees have a material financial interest. In no event will we recommend or cause you to enter into transactions for the purpose of benefiting the direct or indirect securities holdings of our personnel.

We and our representatives may buy or sell securities we recommend to you. Our employees may invest their own funds in mutual funds, variable annuities, individual issues, private placements and other similar vehicles which we may also recommend to you. Such investments will be made independently of your investments and will be based upon our employees' own circumstances. However, returns of our employees' investments could be higher or lower than your returns, given the differences in circumstances. This practice could create a conflict of interest since we and our employees are in a position to materially benefit from the sale or purchase of those securities. Abusive practices, such as "scalping" and "front-running," could take place if we did not have adequate policies and procedures in place to detect such activities. Scalping is selling a security for a profit immediately after a recommendation to purchase that security. Front-running is trading personal accounts prior to trading client accounts. We address these issues with our code of ethics and written compliance manual for the firm. Our employees must provide their personal securities holdings to the Chief Compliance Officer which helps address this conflict.

Item 12 Brokerage Practices

In the event that the client requests that Montis recommend a broker-dealer/custodian for execution and/or custodial services, Montis generally recommends that investment advisory accounts be maintained at Schwab and/or Fidelity. Prior to engaging Montis to provide investment management services, the client will be required to enter into a formal Investment Advisory Agreement with Montis setting forth the terms and conditions under which Montis shall advise on the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that Montis considers in recommending Schwab and/or Fidelity (or any other broker-dealer/custodian to clients) include historical relationship with Montis, financial strength, reputation, execution capabilities, pricing, research, and service. Although the transaction fees paid by Montis' clients shall comply with Montis' duty to obtain best execution, a client may pay a transaction fee that is higher than another qualified broker-dealer might charge to effect the same transaction where Montis determines, in good faith, that the transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, transaction rates, and responsiveness. Accordingly, although Montis will seek competitive rates, it may not necessarily obtain the lowest possible rates for client account transactions. Transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, Montis' investment advisory fee.

Non-Soft Dollar Research and Benefits: Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Montis can receive from Schwab and/or Fidelity (or another broker-dealer/custodian, investment manager, platform or fund sponsor, or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist Montis to better monitor and service client accounts maintained at such institutions. Included within the support services that can be obtained by Montis can be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support-including client events, computer hardware and/or software and/or other products used by Montis in furtherance of its investment advisory business operations.

Certain of the above support services and/or products assist Montis in managing and administering client accounts. Others do not directly provide such assistance, but rather assist Montis and/or its representatives.

Montis' clients do not pay more for investment transactions effected and/or assets maintained at Schwab and/or Fidelity as a result of this arrangement. There is no corresponding commitment made by Montis to Schwab and/or Fidelity, or any other any entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

ANY QUESTIONS: Montis' Chief Compliance Officer, Jon Ullman, remains available to address any questions that a client or prospective client may have regarding the above arrangements and the corresponding conflict of interest presented by such arrangements.

Directed Brokerage. Montis generally recommends that its clients utilize the brokerage and custodial services provided by Schwab and/or Fidelity. Montis generally does not accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Montis will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by Montis. As a result, a client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. **Please Note:** In the event that the client directs Montis to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through Montis. Higher transaction costs adversely impact account performance. **Please Also Note:** Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

Order Aggregation. Transactions for each client account generally will be effected independently, unless Montis decides to purchase or sell the same securities for several clients at approximately the same time. Montis may (but is not obligated to) combine or "bunch" such orders to obtain best execution. Should Montis bunch client transactions, such transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. Firm shall not receive any additional compensation or remuneration as a result of such aggregation.

Item 13 Review of Accounts

For those clients to whom Montis provides asset management services, account reviews are conducted on an ongoing basis by one or more of the Firm's investment professionals. All asset management and financial planning clients are advised that it remains their responsibility to advise Montis of any changes in their investment objectives and/or financial situation. All clients (in person or telephonically) are encouraged to review financial planning issues, investment objectives and account performance with Montis on an annual basis, as applicable.

Montis may also conduct account reviews based upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.

Clients are provided, at least quarterly, with summary account statements directly from the broker-dealer/custodian for the client's accounts. Montis shall generally also provide a quarterly report summarizing account activity and performance.

Item 14 Client Referrals and Other Compensation

As indicated at Item 12 above, Montis can receive from Schwab and/or Fidelity (and others) without cost (and/or at a discount), support services and/or products. Montis' clients do not pay more for investment transactions effected and/or assets maintained at Schwab and/or Fidelity (or any other institution) as result of this arrangement. There is no corresponding commitment made by Montis to Fidelity, or to any other entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangements.

ANY QUESTIONS: Montis' Chief Compliance Officer, Jon Ullman, remains available to address any questions that a client or prospective client may have regarding the above arrangements and the corresponding conflict of interest presented by such arrangements.

Montis does not compensate unaffiliated individuals or entities for prospective client introductions.

Item 15 Custody

Montis shall have the ability to deduct its advisory fee from the client's custodial account on a quarterly basis. Clients are provided with written transaction confirmation notices, and a written summary account statement directly from the custodian (i.e., Schwab, Fidelity, etc.) at least quarterly. **Please Note:** To the extent that Montis provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by Montis with the account statements received from the account custodian. **Please Also Note:** The account custodian does not verify the accuracy of Montis' advisory fee calculation.

Montis engages in other practices and/or services on behalf of its clients that require disclosure at the Custody section of Part 1 of Form ADV, certain of which practices and/or services are subject to an annual surprise CPA examination in accordance with the requirements of Rule 206(4)-2 under the Investment Advisers Act of 1940. In addition, certain clients have established asset transfer authorizations that permit the qualified custodian to rely upon instructions from Montis to transfer client funds or securities to third parties. However, in accordance with the guidance provided in the SEC's February 21, 2017 *Investment Adviser Association* No-Action Letter, the affected accounts are not subject to an annual surprise CPA examination. Custody arrangements are also disclosed at Item 9 of Part 1 of Montis' Form ADV. **ANY QUESTIONS: Montis' Chief Compliance Officer, Jon Ullman, remains available to address any questions that a client or prospective client may have regarding custody-related issues.**

Item 16 Investment Discretion

You can engage us to provide asset management services on a discretionary basis. Discretionary trading authority means placing a trade in your account without your prior approval. You will execute an agreement with us granting us discretionary trading authority to buy, sell, or otherwise effect investment transactions involving the assets in your account. Although we may have discretionary authority, we generally seek (with exceptions) to obtain your approval prior to placing transactions for your account(s).

You may, at any time, impose restrictions, in writing, on our discretionary authority. For example, you can limit the types and amounts of particular securities we purchase for your account.

Item 17 Voting Client Securities

We do not vote client proxies. You maintain exclusive responsibility for: (1) directing and voting the proxies solicited by issuers of securities you own, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to investments in your accounts. You will receive proxies or other solicitations directly from your account custodian. You may contact us to discuss any questions you may have with a particular solicitation.

Item 18 Financial Information

We do not solicit fees of more than \$1,200, per client, six months or more in advance. We do not have any financial condition likely to impair us from meeting our contractual commitments to you. We have not been the subject of a bankruptcy petition.

ANY QUESTIONS:

Montis' Chief Compliance Officer, Jon Ullman, remains available to address any questions regarding this Part 2A.