

ITEM 1 – COVER PAGE



Part 2A of Form ADV Brochure for:

Dedicated Capital Advisors, LLC

**601 Montgomery Street, Suite 1111
San Francisco, CA 94111
Telephone: 415-765-1778**

March 31, 2022

This brochure provides information about the qualifications and business practices of Dedicated Capital Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at 415-765-1778 and/or krauzi@dedicated-cap.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Registration of an Investment Adviser does not imply any certain level of skill or training.

Additional information about Dedicated Capital Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 – MATERIAL CHANGES

The following material changes have been made since our last annual amendment dated March 31, 2021:

- Updated **Item 4 – Advisory Business** to reflect current regulatory assets under management.

ITEM 3 – TABLE OF CONTENTS

| | |
|---|----|
| ITEM 1 – COVER PAGE..... | 1 |
| ITEM 2 – MATERIAL CHANGES..... | 2 |
| ITEM 3 – TABLE OF CONTENTS..... | 3 |
| ITEM 4 – ADVISORY BUSINESS..... | 4 |
| ITEM 5 – FEES AND COMPENSATION | 6 |
| ITEM 6 - PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT..... | 8 |
| ITEM 7 – TYPES OF CLIENTS | 8 |
| ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS | 8 |
| ITEM 9 – DISCIPLINARY INFORMATION | 11 |
| ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS.... | 11 |
| ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING..... | 11 |
| ITEM 12 – BROKERAGE PRACTICES..... | 12 |
| ITEM 13 – REVIEW OF ACCOUNTS..... | 13 |
| ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION..... | 13 |
| ITEM 15 – CUSTODY | 13 |
| ITEM 16 – INVESTMENT DISCRETION | 13 |
| ITEM 17 – VOTING CLIENT SECURITIES | 14 |
| ITEM 18 – FINANCIAL INFORMATION..... | 14 |

ITEM 4 – ADVISORY BUSINESS

Description of the Advisory Firm

Dedicated Capital Advisors, LLC (“Dedicated”) is a Delaware Limited Liability Company established in 2013. Kurt Walter Rauzi is Managing Director of the firm and principal owner.

Description of Financial Planning Services

Dedicated provides comprehensive financial planning services including estate and wealth transfer planning, family coaching, philanthropic and legacy planning, business succession and strategy planning, risk and investment management and insurance planning. These services are delivered through our multi-phase holistic planning process of Discovery, Planning, Implementation and Management. Prior to engaging Dedicated to provide any of the foregoing services, the client is required to enter into one or more written agreements with Dedicated setting forth the terms and conditions under which Dedicated renders its services.

During Discovery (Phase I), Dedicated spends time learning more about you and your desired personal, family, business, financial, and philanthropic goals and objectives. Dedicated will prepare a Discovery Analysis: a comprehensive written assessment of your current situation detailing your goals and objectives, an individually crafted investment policy statement based on your risk tolerance, a financial statement, a current estate and wealth transfer plan, and your projected estate and tax liability.

During Planning (Phase II), Dedicated designs a customized plan to meet the objectives of your Discovery Analysis. The plan will explore and evaluate the various planning tools and techniques available and will consider/contain integrated multidisciplinary strategies, detailed financial analysis (including cash-flows and tax savings), philanthropic strategies, illustrative graphics, proposed estate distribution diagrams, and a narrative explanation of all of our recommendations to you. We will thoroughly review the plan with you (and your advisors, as necessary) and will confirm its design meets with your approval. Following the review and evaluation process, we will make any necessary modifications to the plan.

During Implementation (Phase III), Dedicated assumes the role of ensuring that your plan is implemented successfully and in an organized and timely fashion. Dedicated will coordinate the efforts of your advisor team and other professionals, such as accountants, trust officers, attorneys, and investment managers. We will provide the necessary methods, materials, and processes to complete your plan’s directives and help you realize your personal, family, financial, and philanthropic goals.

During Management (Phase IV), Dedicated assumes the role of ensuring your plan is managed successfully and that you will have direct and constant access to us. Dedicated will continue to orchestrate coordination between your advisors and other professionals. We will take ownership of timelines and will provide updates on progress achieved, decisions made, and issues related to the management of the plan. The services provided in this phase are ongoing.

Description of Investment Advisory Services

If a client chooses to engage Dedicated for investment advisory services we will work with the client to develop an investment profile which determines risk tolerance, time horizon and other factors that may impact the clients’ investment needs. Dedicated ensures that clients’ investments are suitable for their investment needs, goals, objectives and risk tolerance.

Clients are advised to promptly notify Dedicated if there are changes in their financial situation or investment objectives or if they wish to impose any reasonable restrictions upon Dedicated's investment advisory services. Clients may impose reasonable restrictions or mandates on the management of their account (example: requests that a portion of their assets be allocated to socially responsible or impact investments) if, in Dedicated's sole discretion, the conditions will not materially impact the performance of a portfolio strategy or prove overly burdensome to its management efforts.

Clients can engage Dedicated to advise all or a portion of their assets on a discretionary or non-discretionary basis. Dedicated primarily allocates clients' investment advisory assets among Independent Managers (collectively "Managers" as defined below) in accordance with the investment objectives of the client. In addition, Dedicated may recommend that clients who are "accredited investors" as defined under Rule 501 of the Securities Act of 1933, as amended, invest in private placement securities, which may include debt, equity, and/or pooled investment vehicles when consistent with the clients' investment objectives.

Dedicated also may render non-discretionary investment management services to clients relative to variable life/annuities that they may own, their individual employer-sponsored retirement plans, private placements or funds, or other products that may not be held by the client's primary custodian. In so doing, Dedicated either directs or recommends the allocation of client assets among the various investment options that are available with the product.

Dedicated tailors its advisory services to the individual needs of clients. Client assets are maintained at the specific insurance company or custodian designated by the product.

Use of Managers

As indicated above, Dedicated recommends that certain clients authorize the active discretionary management of a portion of their assets by and/or among certain Independent investment managers ("Managers"), based upon the stated investment objectives of the client. Dedicated currently recommends Fort Point Capital Partners LLC ("Fort Point") and/or Frontier Asset Management, LLC ("Frontier") under this program.

Clients will be required to execute a separate co-advisory agreement with Dedicated and the selected Manager(s) which outlines the terms and conditions of the relationship and the applicable advisory fees.

When recommending or selecting Managers for a client, Dedicated reviews information about the Manager such as its disclosure brochure and/or material supplied by the Manager or independent third parties for a description of the Manager's investment strategies, past performance and risk results to the extent available. Factors that Dedicated generally considers in recommending a Manager include the client's stated investment objectives, as well as the Manager's management style, performance, reputation, financial strength, reporting, pricing, and research. The investment management fees charged by Managers, together with the fees charged by the corresponding designated broker-dealer/custodian of the client's assets, are generally exclusive of, and in addition to, Dedicated's planning engagement fees. The investment advisory fees are set forth below. In addition to Dedicated's written disclosure brochure, the client will receive the written disclosure brochure of the designated Managers upon commencement of the co-advisory relationship and annually thereafter.

For more information about our investment strategy, please refer to Item 8 below.

Advisory Services to Retirement Investors

When Dedicated provides investment advice to Clients regarding retirement plan accounts or individual retirement accounts, Dedicated are fiduciaries 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. The way Dedicated makes money creates some conflicts with Client interests, so Dedicated operates under a special rule that requires Dedicated to act in the best interest of the Client and not put Dedicated's interests ahead of the Client's interests.

Under this special rule's provisions, Dedicated must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put Dedicated's financial interests ahead of a Client's interests when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that Dedicated gives advice that is in the Client's best interest;
- Charge no more than is reasonable for the services provided; and
- Give Clients basic information about conflicts of interest.

Wrap Fees

Dedicated does not participate in wrap fee programs.

Assets Under Management

As of December 31, 2021, the Dedicated had approximately \$79.7 million regulatory assets under management on a discretionary basis and approximately \$38 million on a non-discretionary basis, for a total of approximately \$117.7 million in total regulatory assets under management.

ITEM 5 – FEES AND COMPENSATION***Financial Planning Services***

Dedicated offers its financial planning services through a multi-phase holistic planning process of Discovery, Planning, Implementation and Management which are described in further detail in Item 4.

Dedicated charges flat fees for its financial planning services based on the complexity and scope of work required for each phase of service. Fees are negotiable and range from 0.25%-1% of assets planned.

Prior to engaging Dedicated for any of the foregoing services, the client is required to enter into one or more written agreements with Dedicated, which set forth the fee schedule as well as the terms and conditions of the services to be rendered.

Investment Advisory Services

Dedicated offers its investment advisory services on a fee basis based upon assets under management. Our compensation is negotiable, and arrangements with individual clients may vary.

The typical annual fee schedule for our investment advisory service co-managed by Fort Point (exclusive of expenses referred to on the following page) is as follows:

| | Account Size | Fee |
|--------------|------------------------------|------------|
| First | \$0 to \$3 million | 1.25% |
| Next | \$3 to \$10 million | 0.90% |
| Next | \$10 to \$20 million | 0.80% |
| Next | \$20 to \$50 million | 0.60% |
| Next | \$50 to \$100 million | 0.40% |
| Next | \$100 million and up | Negotiable |

The typical annual fee schedule for our investment advisory service co-managed by Frontier (exclusive of expenses referred to on the following page) is as follows:

| Account Size | Gross Fee | Admin |
|------------------------------|------------------|--------------|
| \$0 to \$3 million | 1.00% | \$400 |
| \$3 to \$5 million | 0.95% | None |
| \$5 to \$10 million | 0.90% | None |
| \$10 to \$30 million | 0.75% | None |
| \$30 to \$50 million | 0.60% | None |
| \$50 to \$100 million | 0.50% | None |
| \$100 million and up | 0.30% | None |

Dedicated reserves the right to negotiate different fee structures with individual clients.

We believe these fees are competitive with those charged by other investment advisors for comparable services, however, comparable services may be available from other sources for lower fees than those disclosed above.

All advisory fees will be collected by the Manager and a portion of the fee, as disclosed in the agreement, will be payable to Dedicated. It should be noted that the Manager's method of billing (advance or arrears), manner of billing (quarterly or monthly) and basis for billing (average daily balance versus the last day of a calendar quarter or month, or some other method) may differ. Clients will receive an explanation of the Managers' billing practices in the co-advisory agreement or the Manager's Form ADV.

Expenses

The investment advisory fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses, which shall be incurred by the client. Clients may incur certain charges imposed by custodians such as custodial fees, wire transfer and electronic fund fees. Mutual funds and exchange-traded funds also charge internal management fees, which are disclosed in a fund's

prospectus. Private placements charge internal fees which are disclosed in the confidential offering documents.

Such charges, fees and commissions are exclusive of and in addition to the investment advisory fee. Dedicated does not receive any portion of these commissions, fees, and costs.

Our Managers currently use TD Ameritrade and Fidelity as the platform for client accounts and custodial services. TD Ameritrade and Fidelity are SEC registered broker-dealers and members of FINRA/SIPC. Dedicated does not receive any compensation from TD Ameritrade or Fidelity.

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

Dedicated does not charge performance based compensation.

ITEM 7 – TYPES OF CLIENTS

Dedicated provides its services primarily to high net worth individuals and their related family and business entities.

There is a minimum of \$1,000,000 for opening or maintaining an account with Dedicated. The Managers may, however, impose more restrictive account requirements than Dedicated. In such instances, Dedicated may alter its corresponding account requirements to accommodate those of the Managers.

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

General

Method of Analysis in relation to the firm involves deciding which Managers will service client accounts. The Manager will employ various methods of analysis of its own in the course of providing the actual management services.

Investment Strategies

Dedicated strives to provide each client with a sustainable investment experience. Dedicated pursues a consistent strategy tailored to each client's risk tolerance, as described in each client's investment profile, to build client portfolios. Dedicated Capital builds client profiles according to the following process:

- Identifies client's risk tolerance;
- Defines the client's time horizon;
- Ensures that the client's liquidity needs are assessed and met; and
- Defines market metrics, which include volatility and correlation.

Dedicated will allocate client assets to one or more Managers, which employ a variety of portfolio strategies to assist us in accomplishing the above goals.

Investment Instruments Used

Dedicated recommend the use of Managers for clients, and the investment instruments used by these Managers include, but are not limited to, the following:

- Exchange Listed Securities
- OTC Securities
- Exchange Listed Options
- Exchange Listed Futures
- Exchange Listed Master Limited Partnerships
- Exchange Listed Closed-End Funds
- Exchange Listed ETFs or ETNs
- Fixed Income (bonds, notes, or loans)
- Non-US Equities
- Hedge Funds
- Private Equity

Fort Point Capital Partners and Dedicated Capital Advisors Joint Strategy

In addition to the strategies and methods described above, for clients who will be co-advised by Fort Point and Dedicated there may be additional strategies employed including, but not limited to, the selection of additional sub-advisers.

Risks

These methods, strategies and investments involve risk of loss to the clients. Investors must be prepared to bear the loss of their entire investment.

The principal strategies of the Managers are subject to several risks, any of which could cause an investor to lose money. The following risks are not a complete explanation of the risks involved in a strategy. Investors are encouraged to review each individual Manager's offering documents. The principal risks of investing are as follows:

General Securities Investment Risk - Clients may invest in securities, including ETFs and options. Markets for securities in general are subject to fluctuations and the market value of any particular investment may vary substantially. No assurance can be given that the client's portfolio will generate any income or will appreciate in value or that the client will be able to realize any appreciation that may occur. Investing in securities involves the risk of loss. Clients should be prepared to bear such loss.

Use of Independent Managers Risk - Dedicated recommends the use of Managers for certain clients. Dedicated will continue to do ongoing due diligence of such managers, but such recommendations rely, to a great extent, on the Managers ability to successfully implement their investment strategy. In addition, Dedicated does not have the ability to supervise the Managers on a day-to-day basis. There is a risk that Managers may fail to abide by their respective stated investment policies and guidelines when managing client assets on our recommendation.

Additionally, concentration of an investment in a particular Manager materially increases the risk to the client that the Manager will lose key personnel, be engaged in fraud or fail to achieve the investment objective. Further, some Managers may consist of only one or a limited number of principals. If any such person died or became incapacitated, a client that invests its assets with such a Manager might sustain substantial losses. More information about each Manager's risks can be found in the respective Managers' Form ADV Brochures.

Stock Market Risk - This is the chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising prices and periods of falling prices. When the stock market is subject to significant volatility, the risks associated with investing may increase.

Foreign Securities and Emerging Markets Risk - This is the risk associated with investments in foreign countries and emerging markets. The following factors make foreign securities more volatile: political, economic, and social instability; foreign securities may be harder to sell, brokerage commissions and other fees may be higher for foreign securities; and foreign companies may not be subject to the same disclosure and reporting standards as U.S. companies.

Smaller and Mid-sized Companies Risk – This is the risk that the securities of such issuers may be comparatively more volatile in practice than those of companies with larger capitalizations, and may lack the depth of management, diversity in products, and established markets for their products and/or services that may be associated with investments in larger issuers.

Currency Risk - This is the risk that the value of foreign securities may be affected by changes in currency exchange rates. Additionally, positions may be held in foreign currencies, which are affected by changes in exchange rates to the investor's home currency.

Interest Rate Risk – This is the chance that the value of debt securities overall will decline because of rising interest rates.

Income Risk – This is the chance that income will decline because of falling interest rates.

Credit Risk – This is the chance that a debt issuer will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of that debt to decline.

Options Trading Risk – With any investment there are material risks involved when utilizing option overlay strategies and these strategies may not achieve the stated goals and the Client risks the loss of his/her investment and the Client should be prepared to bear such losses. The trading of options and other derivatives is highly speculative and may entail risks that are greater than those present when investing in other securities.

Clients may buy or sell (write) both call options and put options, and when they write options, they may do so on a "covered" or an "uncovered" basis. A call option is "covered" when the writer owns securities of the same class and amount as those to which the call option applies. A put option is covered when the writer has an open short position in securities of the relevant class and amount. Clients' option transactions may be part of a hedging strategy (i.e., offsetting the risk involved in another securities position) or a form of leverage, in which the client has the right to benefit from price movements in a large number of securities with a small commitment of capital. These activities involve risks that can be substantial, depending on the circumstances.

In general, without taking into account other positions or transactions a Client may enter into, the principal risks involved in options trading can be described as follows: When a Client buys an option, a decrease (or inadequate increase) in the price of the underlying security in the case of a call, or an increase (or inadequate decrease) in the price of the underlying security in the case of a put, could result in a total loss of their investment in the option (including commissions). A Client could mitigate those losses by selling short, or buying puts on, the securities for which it holds call options, or by taking a long position (e.g., by buying the securities or buying calls on them) in securities underlying put options.

When a Client sells (writes) an option, the risk can be substantially greater than when it buys an option. The seller of an uncovered call option bears the risk of an increase in the market price of the underlying security above the exercise price. The risk is theoretically unlimited unless the option is "covered." If it is covered, the Client would forego the opportunity for profit on the underlying security should the

market price of the security rise above the exercise price. If the price of the underlying security were to drop below the exercise price, the premium received on the option (after transaction costs) would provide profit that would reduce or offset any loss the client might suffer as a result of owning the security.

If prospective Clients do not understand options, we strongly encourage them to read *CHARACTERISTICS AND RISKS OF STANDARDIZED OPTIONS*. The document may be obtained by contacting us directly or may be obtained by going to the following link: <http://www.optionsclearing.com/about/publications/character-risks.jsp>.

Leverage Risk - Leveraging strategies can increase risk of loss and volatility. In addition, margin trading requires the pledge of assets of the Client as collateral, and margin calls can result in the Client being required to pledge additional collateral or in liquidation of the Client's holdings, which can result in selling, closing or covering portfolio positions at substantial losses that would not otherwise be realized.

Risks Associated with Investments in Private Placements - Dedicated may recommend client's invest assets in limited partnerships, private investment programs, and other private placements. Such investments may be subject to a variety of risks, including, but not limited to, lack of operating history, reliance on key personnel of the investment program or limited partnership, absence of regulatory oversight, limited withdrawal rights, substantial fees and expenses, illiquidity of interests, and potential mandatory withdrawal. Dedicated strongly encourages clients to carefully consider the risk disclosures contained in the offering documents, which clients sign and agree to before any investments in such private investment programs are made.

ITEM 9 – DISCIPLINARY INFORMATION

Dedicated is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management. Dedicated does not have any required disclosures to this Item.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Some associated individuals of Dedicated may also be compensated by the sale of insurance products. This information would be disclosed to clients as appropriate. More information about the individuals selling insurance products can be found in their respective ADV Part 2B Brochure Supplements.

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

Dedicated has adopted a Code of Ethics ("Code"), pursuant to SEC rule 204A-1, that describes the standards of business conduct that it requires of employees and accounts owned predominantly by persons associated with Dedicated and establishes procedures intended to prevent Dedicated and its personnel and certain of their relatives, from inappropriately benefiting from Dedicated's relationships with its clients. The Code provides that:

- (i) Dedicated's clients' interests come before Dedicated's or employees' interests;
- (ii) Dedicated must disclose to clients all material facts about conflicts of which it is aware between Dedicated and its employees' interests on the one hand and clients' interests on the other;
- (iii) Employees must operate on Dedicated's and their own behalf consistently with Dedicated disclosures to and arrangements with clients regarding conflicts and its efforts to manage the impacts of those conflicts;
- (iv) Dedicated and its employees must not take inappropriate advantage of Dedicated's clients or their positions of trust with or responsibility to clients; and
- (v) Dedicated and its employees must comply with all applicable securities laws.

The Code generally prohibits employees from trading in any securities held by client accounts and requires employees to report personal securities holdings on an annual basis. In addition, Dedicated monitors all employees' securities transactions. The Code includes procedures for and restrictions on employee trading intended to prevent employees from benefiting from, or appearing to benefit from, any price movement that may be caused by client transactions or Dedicated's recommendations regarding securities. Among other things, these include requirements that employees make a written request for and receive clearance from Dedicated's Chief Compliance Officer (or his or her designee) before they buy or sell any security (other than certain government securities, shares of mutual funds not managed by Dedicated and certain other types of securities that Dedicated does not believe create a potential for conflicts of interest). Pre-cleared transactions must be completed within a specified time frame. The Code also contains restrictions on and procedures to prevent inappropriate trading while Dedicated is in possession of material nonpublic information.

The pre-clearance process is used to prevent front-running in accordance with Dedicated's policy that client interests come before the interests of Dedicated and its employees. If a conflict of interest does arise, then the client account always comes first. In an instance of allocation, better prices will always be given to client accounts.

Dedicated will provide a copy of its Code of Ethics to any client or prospective client upon request. Such a request may be made by submitting a written request to Dedicated at the address on the cover page of this brochure.

ITEM 12 – BROKERAGE PRACTICES

Use of Outside Managers

Managers will determine which brokers will be selected for executing client transactions. Dedicated will monitor the Managers to ensure that clients are receiving the following:

- 1) Efficient execution
- 2) Efficient trade settlement
- 3) Financial strength
- 4) Costs – commissions lower than industry average
- 5) Platform that handles all the client accounts in an efficient manner

The Managers recommended by Dedicated Capital require clients to utilize the custodial services of TD Ameritrade or Fidelity. Clients should refer to the Managers Brochure for more information on how the Manager determines broker-dealers used to execute client orders, receipt

of any soft dollar benefits from those broker-dealers, directed brokerage policy and use of order aggregation.

Soft Dollars

Dedicated does not have any “soft dollar” arrangements with brokers and/or dealers.

ITEM 13 – REVIEW OF ACCOUNTS

Dedicated will perform client account reviews on at least a quarterly basis or more frequently as a result of a dramatic change in economic or market conditions or changes in a client’s personal or financial circumstances. Results of these reviews are typically documented.

On at least an annual basis, Dedicated schedules a face-to-face meeting with each of its clients. At that time, the client is asked to update changes in its risk profile, balance sheet, income statement, tax situation, and any investment objectives. Dedicated reviews with the client the performance of the client’s account, including Manager performance, and discusses any changes to client restrictions or portfolio rebalancing. All such portfolio reviews are documented in the client’s file. If a client cannot or will not meet with the Dedicated, or cannot be reached, all such attempts are documented and recorded to the client’s file.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

Dedicated is required to disclose any relationship or arrangement where it receives an economic benefit from a third party (non-client) for providing advisory services. In addition, Dedicated is required to disclose any direct or indirect compensation that it provides for client referrals. Dedicated has no such arrangements to disclose.

Client Referrals

Dedicated does not currently engage third parties to solicit advisory clients on its behalf.

ITEM 15 – CUSTODY

It is Dedicated policy to not take custody of client funds or securities; all client funds and securities will be maintained at a qualified custodian.

The qualified custodians recommended by the Managers selected by Dedicated have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid directly to Dedicated. Clients should carefully review the statements sent directly by the qualified custodians.

Clients may receive account performance reports from Dedicated and/or the Manager. Clients should carefully review such reports and compare them to the official statement from the qualified custodian (TD Ameritrade or Fidelity as applicable).

ITEM 16 – INVESTMENT DISCRETION

Dedicated and/or the Manager receive discretionary authority from the client at the onset of an advisory relationship, upon execution of a limited power of attorney, granting of trading

authorization or limited trading authorization, to select the identity and amount of securities to be bought or sold, and in the case of Fort Point to hire or fire subadvisors. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities, determining amounts, and choosing Managers, Dedicated observes the investment policies, limitations and restrictions of the clients it advises.

As described above, Dedicated and Fort Point or Frontier will be acting in a co-advisory capacity for certain clients. Under each such arrangement, clients will sign a co-advisor investment advisory agreement that delineates the specific responsibilities of Dedicated and Fort Point or Frontier.

Investment guidelines and restrictions, and any subsequent changes thereto, must be provided to the Dedicated in writing.

ITEM 17 – VOTING CLIENT SECURITIES

As a matter of firm policy and practice, Dedicated does not have any authority to and does not vote proxies on behalf of advisory clients. Each of the Managers recommended by Dedicated will have a proxy voting policy which will be disclosed in the co-advisory agreement and or the Managers' Form ADV Brochure.

ITEM 18 – FINANCIAL INFORMATION

Dedicated does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance. In addition, Dedicated is required to disclose any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. Dedicated has no disclosures pursuant to this Item.