

FUND MANAGEMENT

(Highland Investment Advisors LLC DBA Fund Management)

Form ADV Part 2A

December 5, 2024

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This brochure provides information about the personnel and business practices of Highland Investment Advisors, LLC. This brochure has not been approved by the U.S. Securities and Exchange Commission, or by any state securities authority. If you have any questions regarding this brochure, please call us at 414-755-2309, or by email at adrake@highlandinvestmentadvisors.com. Being licensed as an Investment Advisor does not imply any level of skill or training.

Additional information about **Highland Investment Advisors, LLC** is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Summary of Material Changes

Since the last filing of this brochure on July 1, 2024, the following material changes have occurred:

- Item 4 assets under management calculation updated.
- Cover pages updated to reflect new Branch office address.
- 2B removed for Ken Karr, now a stand alone document.

Item 3 – Table of Contents

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Item 4 Advisory Business

- A. Fund Management Corporation (FMC) was founded by Paul A. Presti in 1984. On November 18, 2014, Fund Management Corporation entered into a purchase agreement with Highland Investment Advisors, LLC (HIA).
- B. Effective December 31, 2020, FMC was dissolved as a Wisconsin corporate entity and withdrew its registration as an IARD investment advisor. On January 1, 2021, former clients of FMC were reassigned to Highland Investment Advisors, LLC. DBA Fund Management. ("FM")
- C. FM provides investment advice primarily for securities, including but not limited to mutual funds, exchange traded funds (ETF), closed end funds (CEF), and individual securities which are relevant to meet the individual needs of the client. FM continuously evaluates the investment recommendations to be consistent with the investment objectives and risk tolerance of the client.
- D. FM also provides financial planning services to its investment advisory clients upon request. Financial planning may include, but is not limited to: retirement planning, education, cash flow analysis, estate planning, insurance planning, investment management, and tax planning. Clients are not charged for financial planning services
- E. FM does not participate in wrap fee programs.
- F. As of November 29, 2024, HIA has approximately \$314,108,378 in discretionary client assets under management and \$0 in non-discretionary assets under management.

Item 5 Fees and Compensation

Advisory fees are paid in advance quarterly based on total client household assets under management at quarter end. This Schedule may be amended from time to time by the Adviser upon thirty (30) days' written notice to the Client:

Advisory fees are charged according to the following fee schedule:

<u>Account Objective: Equity based</u>	<u>Annual Fee as % of Total Assets</u>
\$ 0 to \$ 99,999	1.75%

\$100,000 to \$149,999	1.25%
\$150,000 or greater	1.00%
<u>Account Objective: Income based</u>	<u>Annual Fee as % of Total Assets</u>
All dollar amounts	0.50%

Fee Calculation Examples:

<u>Total Asset Value of Account</u>	<u>Fee %</u>	<u>Fee Paid (annualized)</u>
\$140,000 - Equity	1.25	\$1,750
\$150,000 – ½ Equity + ½ Income	0.75	\$1,125
\$150,000 - Income	0.5	\$750

- A. FMC bills clients quarterly, on a forward basis at the beginning of each calendar quarter. Advisory fees are calculated based on the market value of investments under management as of the just completed quarter end. For new client accounts opened mid- quarter, management fees are prorated from the date assets are transferred into the account. Management fees are not assessed on accounts open less than 15 calendar days during the quarter.
- B. The basic fee schedule is negotiable and may vary based on the scope of the total relationship between FM and the client. Fees may vary based on factors such as; client type, account objective, pre-existing relationship, service levels, portfolio complexity, account size or other special circumstances or requirements. Some existing clients may pay lower fees than newer clients.
- C. Clients may choose to pay fees or have the fees deducted directly from their account. Clients whose fees are withdrawn from a custodian account authorize the custodian to pay FM the fees due from the client's assets. FM agrees to notify the client in writing, by at least first class mail, the exact amount of the withdrawal based on the above Fee Schedule. The custodian shall notify the Client as least quarterly of the amount that has been paid to FM. The Client, rather than the custodian, shall verify the accuracy of FM's fee calculation.
- D. All mutual funds and other pooled investments such as ETFs pay fees for portfolio management services which reduce the net asset value of the fund's shares. In addition, FM bills its clients an advisory fee based on the value of their total portfolio. Additionally, the Client may have to pay fees charged by the custodian such as transaction fees, account closing fees, etc.
- E. FM does not accept commissions for the sale of investment securities.

Item 6 Performance-Based Fees and Side-By-Side Management

All advisory fees charged by FM are based on a percentage of the assets under management. FM does not charge fees based upon performance.

Item 7 Types of Clients

FM provides investment advice to individuals, corporations and other business entities. As of January 1, 2021, the minimum account size of new accounts is \$100,000. This minimum may be waived in certain instances.

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

- A. Methods of Analysis: FM's method of analysis is based on a combination of fundamental, technical and psychological factors.

Fundamental Analysis – Fundamental analysis incorporates a broad array of economic indicators. This would include analyzing the overall health of the economy based on such indicators as GDP (gross domestic product), LEI (leading economic indicators), manufacturing indexes, service center indexes, and monthly economic conditions known as the Federal Reserve Board's (Fed) "beige book" reported by twelve districts across the nation. Inside the more broadly based economic reports, more specific information on retail sales, home sales, employment, auto sales, factory orders, consumer sentiment, etc. is analyzed. The broad economic indicators provide insight into corporate earnings projections, along with the direction of interest rates. Review of other leading indicators, such as the ECRI (Economic Cycle Research Institute) which act as a precursor to expansion or contraction of the economy, helps to determine its direction. The fundamentals help to provide the direction of interest rates as to whether the Fed provides easy money (expansionary) or tight money (contracting environment). The fundamental underpinnings provide insight for stock analysts, corporate earnings projection, dividends and valuation levels.

Technical Analysis – This method primarily utilizes information in chart form to determine market information. This analysis employs many techniques to determine the underlying basic market trend. The technical aspects confirm the

directional trend whether it be up, down or sideways environment. Reviewing the internal workings of the market include volume, stocks hitting new highs and new lows and advance-decline data, e.g. number of stocks advancing minus declining stocks provides a positive increasing or negative declining trend. Trend analysis is also performed on various sectors of the stock market such as basic materials, financial stocks, etc. and how they compare to the major financial averages such as the Dow Jones Industrials, Dow Jones Transports, Dow Jones Utilities, and the NASDAQ index. Cycle research is also utilized as it pertains to the business cycle (expansion or contraction), presidential election cycle, and decennial cycle (10-year) patterns. Combining various elements of technical indicators helps to provide a systematic approach to trend interpretation.

Psychological Analysis - Market psychology or market sentiment is a feeling the market is expressing at any particular time. Greed, fear, expectations and circumstances are all factors that contribute to the group's investing mentality. This is usually a contrary indicator. Surveys taken from newsletter writers, individual investor's surveys, option players, etc. are used for the basis of this analysis. When the public is euphoric, the market risk proves to be high. The majority of market participants have already bought and valuations levels are usually extended. Conversely, when the majority of participants become pessimistic, depressed, and selling is at extremes, the market environment is usually less risky.

Risk of Loss: Although FM utilizes a broadly diversified approach to investing, there is always a material or market risk when investing in stocks or bonds. Clients should be prepared to bear losses any time they have exposure to stock or bond markets. By using a broadly diversified approach, a client could underperform market equity indexes in a strong rising market. Conversely, the client may have a reduced exposure to market indexes in a declining market.

- B. Investment Strategy: FM investment strategy seeks long term growth of capital appreciation and/or income (or total return) with an emphasis on risk control to obtain prudent investment returns over a longer period of time. This is accomplished by investing the portfolio in a number of diversified investments to meet the client's investment objectives. This includes investing in securities in a wide range of asset classes in the United States and around the world. Some of these funds might be classified as "flexible funds" or "strategic asset allocation funds" that allocate investments among common stocks (large, mid, small-cap), both domestically and internationally, in addition to bonds and other debt instruments; such as US Treasury notes and bonds, investment grade corporate bonds, and debt securities below investment grade, in addition to money market instruments. Investment in a number of diversified and global allocation funds across a broad spectrum of stocks, bonds and cash helps to further mitigate

unnecessary risk.

- C. Mutual fund holdings are sold for various reasons. In the event the mutual fund in question underperforms its investment objective for a period of time, the fund could be sold. Also a change in investment management might prove detrimental to the fund's performance and would be reason for liquidation. Various core holding funds might be held for a number of years or longer. During significant market events, fund holdings could be partially reduced for preservation of capital. There are no significant or unusual risks or frequent trading associated with the type of investment strategy employed.

Item 9 Disciplinary Information

Neither FM nor any of its associates is currently, or have ever been, subject to:

- A. Criminal or civil action in a domestic, foreign or military court of competent jurisdiction; nor have they:
1. ever been convicted of, or plead guilty or *nolo contendere* ("no contest") to (a) any *felony*; (b) a *misdemeanor* that involved *investments* or an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
 2. ever been named the subject of a pending criminal *proceeding* that involves an *investment-related business*, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion; or a conspiracy to commit any of these offenses;
 3. ever been *found* to have been *involved* in a violation of an *investment-related* statute or regulation; or
 4. ever been the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, FM or a *management person* from engaging in any *investment-related* activity, or from violating any *investment-related* statute, rule or order.
- B. An administrative *proceeding* before the SEC, any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority*, nor have they
1. been *found* to have caused an *investment-related* business to lose its authorization to do business; or
 2. been *found* to have been *involved* in a violation of an *investment-related* statute or regulation or been the subject of an *order* by the agency or authority (a) denying, suspending, or revoking the authorization of FM or a

management person to act in an *investment-related* business; (b) barring or suspending FM's or a *management person's* association with an *investment-related* business; (c) otherwise significantly limiting FM's or a *management person's investment-related* activities; or imposing a civil money penalty of more than \$2,500 on FM or a *management person*.

- C. A *self-regulatory organization (SRO)* proceeding nor were they
1. *found* to have caused an *investment-related* business to lose its authorization to do business; or
 2. *found* to have been *involved* in a violation of the *SRO's* rules and were: (i) barred or suspended from membership or from association with other members or were expelled from membership; (ii) otherwise significantly limited from *investment-related* activities; or (iii) fined more than \$2,500.

Item 10 Other Financial Industry Activities and Affiliations

Neither FM nor any of its associates:

- A. have an application pending to register as a broker/dealer or registered representative of a broker/dealer.
- B. are registered, or have an application pending to register, as futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.
- C. have any relationship or arrangement that is material to its advisory business or its clients that would create a material conflict of interest with clients.
- D. On November 18, 2014, FMC entered into a purchase agreement with HIA wherein FMC became a wholly owned subsidiary of HIA. Effective January 1, 2021, FMC clients were reassigned to Highland Investment Advisors LLC DBA Fund Management ("FM) as a result of HIA restructuring.

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

- A. Code of Ethics - FM has a legal fiduciary duty to its clients and endeavors at all times to put the interests of its clients first.

- B. FM is an SEC-registered adviser, and has developed a Code of Ethics designed to detect and prevent violations of applicable investment advisory laws, and to ensure compliance with the internal policies and procedures of FM such as: protection of material non-public client information; supervision of personal securities trading activity; and identification of, and prevention of, using insider information. Employees of FM have received a copy of the Code of Ethics and acknowledge having read and understood it. A copy of the Code of Ethics is available to existing and prospective clients upon request.
- C. FM's Code of Ethics is applicable to all employees who either participate in the formulation or delivery of investment advisory services to clients or otherwise have access to confidential client records or to recommendations being made for client accounts ("access persons"). The Code of Ethics sets forth procedures intended to prevent conflicts of interest between clients and our access persons, and is designed to comply with Rule 204A-1 under the Investment Advisers Act of 1940 and rules of individual jurisdictions. This Code establishes rules of conduct for all of our access persons and is designed among other things to govern personal securities trading activities in the account of access persons. The Code is based upon the principle that FM owes a fiduciary duty to its clients. This requires that all access persons conduct the affairs of FM, including personal securities transactions, in such a manner as to avoid
(1) serving personal interests ahead of clients, (2) taking inappropriate advantage of positions within the firm, and (3) any actual or potential conflicts of interest or abuse of positions of trust and responsibility.
- D. FM prohibits employees or associated persons from recommending any investment wherein FM is incentivized or would derive any economic benefit, directly or indirectly, other than our normal advisory fee. Neither FM nor any of its employees recommends to clients, or buys or sells for client accounts, securities in which FM, affiliated firms, or any of its employees or associates has a material financial interest.
- E. FM and its employees may buy or sell for themselves, securities that are also recommended to clients. FM believes such transactions do not have a significant impact on market prices of the securities or client opportunities in those securities. FM employees are prohibited from purchasing or selling for themselves the same securities (with the exception of mutual funds, or exchanged traded funds) purchased or sold for clients' accounts within two business days of such client purchase or sale.
- F. If transactions by FM or any of its employees are likely to have a significant impact

on market prices, no transactions will be made by FM or its employees until the client's transactions have been entered. If the position in a security held by FM or its employees is significant, the client will be informed of these positions.

- F. FM maintains a list of all securities purchased for itself or its employees, and all securities transactions are reviewed on a regular basis by Adam Drake, President.
- G. A copy of our Code of Ethics is available upon request.

Item 12 Brokerage Practices

- A. FM recommends Fidelity Investments as the client's broker/dealer based upon our belief that Fidelity Investments offers an exceptional value to the client due to the high quality of the electronic interface between the broker and FM. This allows greater productivity and efficiency in the conduct of the Client's account.

FM suggests broker/dealers to clients based primarily on competitive transaction costs and FM attempts to minimize all investment related expenses as a paramount factor in its work on behalf of its clients. FM does not consider client referrals when selecting a broker/dealer.

FM does not receive any soft dollar benefits for using Fidelity Investments. Additionally, FM does not receive client referrals from Fidelity Investments.

Other broker/dealers may be used if it is a requirement of the account, such as in the case of an employer sponsored retirement plan, etc. In these cases, FM may not be able to achieve the most favorable execution of client transactions which may cost the client more money, for example, higher commissions.

- B. FM does not aggregate mutual fund purchases. All assets are held individually by account owners.

Item 13 Review of Accounts

- A. FM investment advisors continuously evaluate investment recommendations and portfolio composition to be compatible with the personal financial objectives, risk tolerances and goals of the client.
- B. Since accounts are only invested in publicly traded securities, they can be

expeditiously reviewed and quickly adjusted if necessary. All clients' securities pricing is obtained electronically daily.

- C. Clients receive account statements from their custodian at least quarterly showing the value of the account and account holdings as of the statement end date. FM also provides condensed account statements on a quarterly basis showing account balances and performance. Ad hoc account reports are available upon request.

Item 14 Client Referrals and Other Compensation

- A. Neither FM nor any employee or representative of FM receives compensation or any other economic benefit for client referrals.
- B. Neither FM nor any employee or representative of FM directly or indirectly compensates any unrelated entity for client referrals.

Item 15 Custody

Under no circumstances will FM have custody of client funds or securities. All client funds and securities are held by a broker/dealer or qualified custodian who provides clients with a statement of their account at least quarterly.

Clients should compare information contained in FM's statement with the statement received from the qualified custodian for accuracy.

Item 16 Investment Discretion

All accounts managed by FM are discretionary. FM requires a signed Limited Power of Attorney from each client. The Limited Power of Attorney enables FM to buy and sell shares of securities without first receiving approval from the client.

Item 17 Voting Client Securities

- A. As a matter of firm policy and practice, FM does not have any authority to, and does not vote proxies on behalf of advisory clients.

- B. Clients are responsible for receiving and voting proxies for any and all securities maintained in their portfolios.

Item 18 Financial Information

- A. FM does not require or solicit prepayment of any dollar amount per client six months or more in advance.
- B. FM does not solicit prepayment of more than \$1,200 in fees per client six months or more in advance, and therefore, is not required to submit a financial statement audited by an independent public accountant.
- C. FM has not been the subject of a bankruptcy petition at any time during the past ten years or at any time prior to that.



**Highland Investment Advisors, LLC
Client Relationship Summary ("Form
CRS")**

December 5, 2024

Highland Investment Advisors, LLC ("Highland"), also doing business as Highland Investment Advisors, LLC DBA Fund Management ("Fund Management"), is a federally registered Investment Advisor with the US Securities & Exchange Commission (SEC). Investment advisory services and fees differ from broker-dealers, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisors, and investing.

What investment services and advice can you provide to me?

Conversation Starters: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

As a fiduciary, Highland offers comprehensive financial planning and discretionary investment advisory services

to individuals and their trusts and estates ("you", "clients", or our "retail investors"). This includes services such as retirement planning and ongoing investment portfolio management. Our services may also include education planning, budgeting, and, when coordinating with outside professionals, tax and estate planning. We rely upon client submitted data which we do not independently verify when we provide these services.

We manage portfolios based on each client's unique investment objectives, risk tolerance, investment time horizon, withdrawal requirements and other special circumstances. We monitor your portfolio, investment strategy, and investments on at least a quarterly basis. Monitoring is a standard service we provide. Your portfolio is managed on a discretionary basis, which means we have the authority to buy and sell investments in your account without speaking to you prior to doing so. We will contact you at least annually to discuss your investments and financial plan.

Although we have access to a very broad spectrum of investments, we do not have to limit the scope of securities that we use in managing client accounts. However, we generally construct our client portfolios using a combination of no-load mutual funds or exchange traded funds ("ETFs"). In some limited instances we may include individual stocks, bonds, no load annuities, or CD's, based upon the unique needs of the client and portfolio. Buying or selling some types of these securities may result in you paying commissions to the custodian.

Our account minimum is \$500,000, although we may waive that amount under certain conditions, such as client extended family members. For additional information about our advisory business and clients we serve please see Item 4 and Item 7 of our Form ADV, Part 2A Brochure here:

<http://www.highlandinvestmentadvisors.com/brochure>

What fees will I pay?

Conversation Starters: If I give you \$10,000 to invest, how much will go to fees and costs and how much will be invested for me? Help me understand how these fees and costs might affect my investments.

Retail investors pay a quarterly asset-based fee for our services. Our advisory fee is calculated based upon your

assets under our management including cash and securities in your account. Fees are determined based on aggregate account valuation and range from 0.45% to 1.75% annually. Fees may be negotiable based upon account size, scope/complexity, services offered, or client type. We may also charge an hourly fee for financial planning.

We only receive fees from you, our client. We do not accept commissions or receive other sources of revenue from any third parties in connection with our services.

The fee we charge is based on the value of your account. Therefore, we have an inherent conflict because our interests would be best served by making recommendations that result in either retaining or increasing assets under management. Clients should understand that financial planning recommendations such as paying off a mortgage, or

A copy of our Form ADV Part 2A is available at www.highlandinvestmentadvisors.com/brochure

withdrawing money for other reasons, reduce our assets under management, thus creating a conflict of interest.

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CRS")**

December 5, 2024

Your account will be held with a custodian, such as Charles Schwab & Co., Inc. or Fidelity. Custodians charge transaction costs, brokerage commissions, and potentially other account service fees, which are in addition to the fees you pay us. These custodian fees are paid to the custodian, not us.

Some securities which may be bought for your account may include mutual funds and ETFs. These securities charge their own fees. You will pay these fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. Please see Item 5.A., B., C., and D., of our Form ADV, Part 2A Brochure.

What are your legal obligations to me when acting as my investment advisor? How does your firm make money and what conflicts of interest do you have?

Conversation Starters: How might your conflicts of interest affect me, and how will you address them?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means:

Custodians provide free services to us, including; access to research, access to conferences, and practice management services. These services may give us an incentive to recommend that clients maintain accounts with these custodians. For more detailed information about our conflicts of interest, please review our Form ADV Part 2A.

How do your financial professionals make money?

Conversation Starters: How do you make money? How do I pay you?

Our financial professional's compensation is based on the total amount of client fees generated by the accounts we manage. We may also receive hourly fees for financial planning services provided to clients with whom we have no investment management relationship.

Do you or your financial professionals have legal or disciplinary history?

Conversation Starters: As a financial professional, do you have any disciplinary history? If so, for what type of conduct?

No for our firm. Yes for our financial professionals. Please visit www.investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Where can I get additional information?

Conversations Starters: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

Call us at 414-755-2309 x-100 at any time to request a current copy of our Form CRS or Form ADV Part 2A and 2B. Retail investors can find additional information about our investment advisory services by calling us, or visiting our firm's website at <http://www.highlandinvestmentadvisors.com/brochure>. Additional information about our firm and financial professionals can also be found at: <https://brokercheck.finra.org/> or www.adviserinfo.sec.gov



PRIVACY POLICY

Highland Investment Advisors and its affiliates are committed to respecting your privacy. We value your trust and have policies and procedures in place to maintain the confidentiality and security of your personal information. We treat client information (both past and present) in a confidential manner.

Information We Collect

The following nonpublic information may be obtained directly from you.

- Name, address, phone number and email address
- Social Security or Taxpayer Identification Number
- Family and general health data
- Assets and liabilities
- Account balances and activity
- Accounts at other institutions

We do not solicit information about you from other external sources.

How We Use Information

We obtain nonpublic information to provide you with the professional services you have requested and to properly manage and coordinate professional services for your investment account.

Disclosures to Unaffiliated Third Parties

We do not disclose your information to outside parties. We do not share, sell or rent your personal information.

The use of, and access to, your personal information by Highland Investment Advisors, LLC is restricted to those employees who need to know that information to process transactions or provide financial services to you.

We will keep information about current, former, and prospective clients confidential unless: 1) the information concerns illegal activities on the part of the client or prospective client, 2) disclosure is required by law, to comply with subpoenas, or court or government agency orders, or 3) the client or prospective client provides written permission allowing disclosure of the information. This includes disclosing information to professionals such as: attorneys, accountants, and/or financial professionals in order to provide services on your behalf.

How We Protect Your Data

We maintain physical, electronic and procedural safeguards to limit access to your nonpublic personal information. This includes physical and electronic data security measures, as well maintaining fault tolerant data processing capabilities.

Highland Investment Advisors, LLC appreciates your business. If you have any questions or comments about this Privacy Policy, please call (414) 755-2309 x100