

**Item 1: Cover Page  
Form ADV Part 2A – Disclosure Brochure  
Effective: November 2024**

**ONESOURCE ADVISORS, LLC**

**d/b/a  
OneSource Wealth Management  
OneSource Health & Wealth Management  
Wise Money Guys  
("OneSource", "Our firm", or the  
"Advisor")**

**4080 CAVITT STALLMAN ROAD, SUITE 200  
GRANITE BAY, CA 95746**

**[www.HealthWealthAdvisory.com](http://www.HealthWealthAdvisory.com)**

**Firm Contact:  
Giuseppe Visconti**

**Chief Compliance Officer  
Phone: (916) 967-3500**

This Form ADV2A ("Disclosure Brochure") provides information about the qualifications and business practices of OneSource Wealth Management (OneSource). If you have any questions about the contents of this Disclosure Brochure, please contact us at (916) 967-3500.

OneSource is a registered investment advisor with offices in California. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through OneSource to assist you in determining whether to retain the Advisor. Additional information about OneSource Wealth Management and its advisory persons are available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by our firm name or by our CRD#319078.

## **Item 2 – Material Changes**

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of OneSource.

OneSource believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. OneSource encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

Since the last update on March 22, 2023, changes to the fee schedule have been made.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of OneSource.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our company name or by our Firm CRD number (319078).

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (916) 967-3500.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

OneSource Advisors, LLC d/b/a OneSource Wealth Management, OneSource Health & Wealth Management, Wise Money Guys (“OneSource” or the “Advisor”) is a registered investment advisor with offices in the State of California. OneSource is organized as a limited liability company (“LLC”) under the laws of the State of California. OneSource was founded in March 2015, and is owned primarily by Legacy Capital Management, LLC. Due to a succession, our firm used to be registered under a different CRD number. John Scambray is the majority owner of Legacy Capital Management, and serves as the CEO and Chief Compliance Officer of OneSource Advisors, LLC d/b/a OneSource Wealth Management, OneSource Health and Wealth Management, Wise Money Guys. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by OneSource.

All material conflicts of interest under CCR Section 260.238 (k) are disclosed below regarding our firm, our representatives or our employees, which could be reasonably expected to impair the rendering of unbiased and objective advice. To comply with CCR Section 260.238(j), we disclose that lower fees for comparable services may be available from other sources.

### **B. Advisory Services Offered**

OneSource offers investment advisory services to individuals, high net worth individuals, pension & profit-sharing plans, trusts, estates and business clients in California and other states (each referred to as a “Client”).

#### **Investment Management Services**

OneSource provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. OneSource works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. OneSource will then construct a portfolio, consisting of diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks and bonds and other types of securities, as appropriate, to meet the needs of its Clients.

OneSource’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. OneSource will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

OneSource evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. OneSource may recommend, on occasion, redistributing investment allocations to diversify the portfolio. OneSource may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

OneSource will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will OneSource accept or maintain custody of a Client’s funds or securities, except for authorized deduction of the Advisor’s fees. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client investment advisory agreement.

As part of our Investment Management service, our firm also provides financial planning and consulting services.

CCR Section 260.235.2 requires that we disclose to our financial planning clients that a conflict of interest

exists between us and our clients. The client is under no obligation to act upon the investment adviser's recommendation. If the client elects to act on our recommendations, the client is under no obligation to effect the transaction through our firm.

#### Retirement Plan Consulting:

Our firm provides retirement plan consulting services to employer plan sponsors on an ongoing basis. Generally, such consulting services consist of assisting employer plan sponsors in establishing, monitoring and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising may include:

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

In providing services for retirement plan consulting, our firm does not provide any advisory services with respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly traded REITS), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs (collectively, "Excluded Assets"). All retirement plan consulting services shall be in compliance with the applicable state laws regulating retirement consulting services. This applies to client accounts that are retirement or other employee benefit plans ("Plan") governed by the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). If the client accounts are part of a Plan, and our firm accepts appointment to provide services to such accounts, our firm acknowledges its fiduciary standard within the meaning of Section 3(21) or 3(38) of ERISA as designated by the Retirement Plan Consulting Agreement with respect to the provision of services described therein.

#### **C. Client Account Management**

Prior to engaging OneSource to provide investment advisory services, each Client is required to enter into an investment advisory agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy – OneSource will assist the Client's in determining their investment goals and objectives and recommend strategy[ies] to be employed to meet those objectives.
- Asset Allocation – OneSource will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – OneSource will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – OneSource will provide investment management and ongoing oversight of the Client's portfolio and overall account.

#### **D. Wrap Fee Programs**

OneSource does not offer or sponsor a wrap fee program.

#### **E. Assets Under Management**

Our firm manages \$95,000,000 on a discretionary basis and \$5,000,000 on a non-discretionary basis as of February 20, 2024.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign an investment advisory agreement that details the responsibilities of OneSource and the Client.

### **A. Fees for Advisory Services**

#### **Investment Management Services**

Investment advisory fees are calculated either quarterly in arrears or quarterly in advance (the “billing period”), pursuant to the terms of the investment advisory agreement with each Client. Investment advisory fees range from 0.50% to 2.00% of assets under management, depending on the size and complexity of the Client relationship. Our firm accounts for deposits and withdrawals during the quarter. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee. Larger relationships are often charged a lower fee. Our firm bills on cash unless otherwise noted in writing.

Investment advisory fees in the first billing period of service are prorated from the inception date of the account[s] to the end of the first billing period. Fees may be negotiable at the discretion of the Advisor. The Client's fees will take

into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by OneSource will be independently valued by the designated Custodian. OneSource will not have the authority or responsibility to value portfolio securities.

Investment advisory fees in the first billing period of service are prorated from the inception date of the account[s] to the end of the first billing period. Fees may be negotiable at the discretion of the Advisor. The Client's fees will take

into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by OneSource will be independently valued by the designated Custodian. OneSource will not have the authority or responsibility to value portfolio securities.

### **B. Fee Billing**

#### **Investment Management Services**

Investment advisory fees will be calculated by the Advisor and deducted by the custodian. Fees are negotiable. As part of this process, if our firm deducts fees directly from the client's account(s), clients understand the following:

- a) Clients must provide our firm with written authorization permitting direct payment of advisory fees from their account(s) maintained by a custodian who is independent of our firm; Custodians send quarterly statements to the client showing the fee amount, the value of the assets upon which the fee is based, and the specific manner in which the fee is calculated as well as disclosing that it is the client's responsibility to verify the accuracy of fee calculation, and that the custodian does not determine its accuracy.

#### **Retirement Plan Consulting:**

Our Qualified Retirement Plan Consulting services are billed based on a percentage of managed Plan assets will not exceed 2.00%. The fee is based on the scope and complexity of our engagement with the client. The fee-paying arrangements will be determined on a case-by-case basis and will be detailed in the signed consulting agreement.

### **C. Other Fees and Expenses**

Clients will incur transaction fees for trades executed by their chosen custodian, with the options of Interactive Brokers, LLC or Charles Schwab & Co via individual transaction charges. These transaction fees are separate from our firm's advisory fees and will be disclosed by the chosen custodian.

In addition, all fees paid to OneSource for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees

and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of OneSource, but would not receive the services provided by OneSource which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by OneSource to fully understand the total fees to be paid.

#### **D. Advance Payment of Fees and Termination**

##### **Investment Management Services**

Either party, client or OneSource, may request to terminate the investment advisory agreement by providing advance written notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid fees from the effective date of termination to the end of the billing period. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior approval.

#### **E. Compensation for Sales of Securities**

OneSource does not buy or sell securities on a commission basis and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above. Certain Supervised Persons of the Advisor may also be licensed insurance professionals and will receive commissions for the implementations of insurance recommendations. Please see Item 10.

### **Item 6 – Performance-Based Fees and Side-By-Side Management**

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OneSource does not charge performance-based fees for its investment advisory services. The fees charged by OneSource are as described in "Item 5 – Fees and Compensation" above and are not based upon the capital appreciation of the funds or securities held by any Client.

OneSource does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

### **Item 7 – Types of Clients**

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OneSource offers investment advisory services to individuals, profit sharing plans, and businesses. The relative percentage of each type of Client is available on OneSource's Form ADV Part 1. These percentages will change over time. OneSource generally does not impose a minimum account or relationship size for establishing an advisory account.

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

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#### **A. Methods of Analysis**

OneSource primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from OneSource is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted above, OneSource generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. OneSource will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, OneSource may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

Margin Transactions: Our firm does not recommend margin accounts, but will facilitate clients who currently utilize margin transactions and margin strategies. As such, our firm may purchase stocks, mutual funds, and/or other

securities for your portfolio with money borrowed from your brokerage account. This allows you to purchase more stock than you would be able to with your available cash, and allows us to purchase stock without selling other holdings. Margin accounts and transactions are risky and not necessarily appropriate for every client. The potential risks associated with these transactions are (1) You can lose more funds than are deposited into the margin account; (2) the forced sale of securities or other assets in your account; (3) the sale of securities or other assets without contacting you; and (4) you may not be entitled to choose which securities or other assets in your account(s) are liquidated or sold to meet a margin call.

**Options:** An option is a financial derivative that represents a contract sold by one party (the option writer) to another party (the option holder, or option buyer). The contract offers the buyer the right, but not the obligation, to buy or sell a security or other financial asset at an agreed-upon price (the strike price) during a certain period of time or on a specific date (exercise date). Options are extremely versatile securities. Traders use options to speculate, which is a relatively risky practice, while hedgers use options to reduce the risk of holding an asset. In terms of speculation, option buyers and writers have conflicting views regarding the outlook on the performance of a:

- **Call Option:** Call options give the option to buy at certain price, so the buyer would want the stock to go up. Conversely, the option writer needs to provide the underlying shares in the event that the stock's market price exceeds the strike due to the contractual obligation. An option writer who sells a call option believes that the underlying stock's price will drop relative to the option's strike price during the life of the option, as that is how he will reap maximum profit. This is exactly the opposite outlook of the option buyer. The buyer believes that the underlying stock will rise; if this happens, the buyer will be able to acquire the stock for a lower price and then sell it for a profit. However, if the underlying stock does not close above the strike price on the expiration date, the option buyer would lose the premium paid for the call option.
- **Put Option:** Put options give the option to sell at a certain price, so the buyer would want the stock to go down. The opposite is true for put option writers. For example, a put option buyer is bearish on the underlying stock and believes its market price will fall below the specified strike price on or before a specified date. On the other hand, an option writer who sells a put option believes the underlying stock's price will increase about a specified price on or before the expiration date. If the underlying stock's price closes above the specified strike price on the expiration date, the put option writer's maximum profit is achieved. Conversely, a put option holder would only benefit from a fall in the underlying stock's price below the strike price. If the underlying stock's price falls below the strike price, the put option writer is obligated to purchase shares of the underlying stock at the strike price.

The potential risks associated with these transactions are that (1) all options expire. The closer the option gets to expiration, the quicker the premium in the option deteriorates; and (2) Prices can move very quickly. Depending on factors such as time until expiration and the relationship of the stock price to the option's strike price, small movements in a stock can translate into big movements in the underlying options.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. OneSource will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

**Options Risk:** Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Additionally, options have an expiration date, which makes them "decay" in value over the amount of time they are held and can expire worthless. Purchasing and writing put and call options are highly



specialized activities and entail greater than ordinary investment risks.

Strategy Risk: There is no guarantee that the investment strategies discussed herein will work under all market conditions and each investor should evaluate his/her ability to maintain any investment he/she is considering in light of his/her own investment time horizon. Investments are subject to risk, including possible loss of principal.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. **Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

### **Item 9 – Disciplinary Information**

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

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

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John Scambray is a licensed insurance agent, however he is not currently affiliated with an outside insurance agency.

Giuseppe Visconti is a registered representative of a Broker Dealer and does receive commissions on insurance products. A conflict of interest exists as these commissionable securities sales create an incentive to recommend products based on the compensation earned. To mitigate this potential conflict, our firm will act in the client's best interest.

Neither the firm or any of its management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Our firm does not select other advisers for our clients.

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

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

OneSource has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all Supervised Persons associated with OneSource. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. OneSource and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of OneSource Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (916)967-3500.

## **B. Personal Trading with Material Interest**

OneSource allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. OneSource does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. OneSource does not have a material interest in any securities traded in Client accounts. No related person of OneSource recommends to clients or buys or sells for clients' accounts investments in which the related person has a material financial interest.

## **C. Personal Trading in Same Securities as Clients**

OneSource allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of OneSource may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by OneSource requiring reporting of personal securities trades by its Supervised Persons for review by the CCO. We have also adopted written policies and procedures to detect the misuse of material, non- public information.

In addition, the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

## **D. Personal Trading at Same Time as Client**

While OneSource allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will OneSource, or any Supervised Person of OneSource, transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

OneSource does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian. Our firm recommends Interactive Brokers LLC and Charles Schwab & Co. (herein the "custodian") to safeguard Client assets and authorize OneSource to direct trades to this custodian as agreed in the investment advisory agreement. Further, OneSource does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where OneSource does not exercise discretion over the selection of the custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by OneSource.

OneSource may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. OneSource does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers. OneSource will generally recommend that Clients establish their account[s] at Interactive Brokers Institutional, a division of Interactive Brokers, Inc., ("Interactive Brokers") member FINRA/SIPC. Interactive Brokers will serve as the Client's "qualified custodian". OneSource maintains an institutional relationship with Interactive Brokers, whereby the Advisor receives economic benefits from Interactive Brokers (Please see Item 14 below.).

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. OneSource does not participate in soft dollar programs sponsored or offered by Interactive Brokers. One Source does participate in a soft dollar program offered by Charles Schwab.

**2. Brokerage Referrals** - OneSource does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

**3. Brokerage** - All Clients are serviced where OneSource will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the custodian, OneSource will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

#### **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. OneSource will execute its transactions through an unaffiliated broker-dealer selected by the Client. OneSource may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

### **Item 13 – Review of Accounts**

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#### **A. Frequency of Reviews**

Securities in a Client's account[s] are monitored on a regular and continuous basis. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

#### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify OneSource if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

#### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

### **Item 14 - Client Referrals and Other Compensation**

#### **A. Compensation Received by OneSource**

OneSource does not receive any economic benefit from another person or entity for soliciting or referring clients.

#### **B. Client Referrals from Solicitors**

OneSource does not currently receive referrals from unaffiliated third parties ("solicitors"), but may do so in the future. OneSource may compensate a solicitor for the referral of new relationships. The Advisor will ensure the solicitor is properly licensed (if required) in the jurisdictions where the Client resides. Compensation paid to a solicitor will not result in the Client being charged a higher fee than they would otherwise be charged. The solicitor will provide all prospective clients with a disclosure statement regarding the fee sharing arrangement with OneSource.

## **Item 15 – Custody**

State Securities Bureaus generally take the position that any arrangement under which a registered investment adviser is authorized or permitted to withdraw client funds or securities maintained with a custodian upon the adviser's instruction to the custodian is deemed to have custody of client funds and securities. As such, our firm has adopted the following safeguarding procedures:

- a) Clients must provide our firm with written authorization permitting direct payment of advisory fees from their account(s) maintained by a custodian who is independent of our firm;
- b) Our firm sends quarterly statements to the client showing the fee amount, the value of the assets upon which the fee is based, and the specific manner in which the fee is calculated as well as disclosing that it is the client's responsibility to verify the accuracy of fee calculation, and that the custodian does not determine its accuracy; and
- c) Our firm sends the custodian a copy of the invoice at the same time that it sends a copy to the client.
- d) The account custodian sends a statement to the client, at least quarterly, showing all account disbursements, including advisory fees.

Clients are encouraged to raise any questions with us about the custody, safety or security of their assets and our custodial recommendations.

## **Item 16 – Investment Discretion**

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OneSource generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by OneSource. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by OneSource will be in accordance with each Client's investment objectives and goals.

## **Item 17 - Voting Client Securities**

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OneSource does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

### **Inclusion of a Balance Sheet**

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Our firm does not require nor is prepayment solicited for more than \$500 in fees per client, 6 months or more in advance. Therefore, our firm has not included a balance sheet for our most recent fiscal year.

### **Disclosure of Financial Condition**

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Our firm has nothing to disclose in this regard.

### **Bankruptcy Petition**

Our firm has nothing to disclose in this regard.