

**Firm Brochure
(Part 2A of Form ADV)**

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This brochure provides information about the qualifications and business practices of Family CFO Inc. If you have any questions about the contents of this brochure, please contact us at: 650-218-3551, or by email at: Annamalai Rajendran (raj@familycfoinc.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 does not imply a certain level of skill or training.

Additional information about Family CFO Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Family CFO Inc. is 127335.

**DATE
February 21, 2024**

Item 2: Summary of Material Changes

Annual Update

The Material Changes section of this brochure will be updated when material changes occur since the previous release of the Firm Brochure and whenever there is a material change

Material Changes since the Last Update

Since our last filing in September of 2023, the following material changes have been made to this brochure:

- Item 4 has been amended to reflect our assets under management as of 12/31/2023.
- Item 19 has been removed as we are an SEC-registered investment adviser and not required to complete state-specific disclosures.

In future filings, this section of the Brochure will address only those “material changes” that have been incorporated since our last delivery or posting of this document on the SEC’s public disclosure website (IAPD) www.adviserinfo.sec.gov.

We may, at any time, update this Brochure and send you a copy (either by electronic means (email) or in hard copy form).

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 650-218-3551 or by email at: Annamalai Rajendran (raj@familycfoinc.com).

Within 120 days of our fiscal year end we will deliver our annual Summary of Material Changes if there have been material changes since the last annual updating amendment. With this Summary, we also hereby offer to deliver an updated Investment Advisor Brochure upon your request at any time during the year. You may submit your request to: Annamalai Rajendran at (650)218-3551 or Annamalai Rajendran (raj@familycfoinc.com).

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Advisory Business

Item 4: Advisory Business

Firm Description

Family CFO operated as a sole proprietorship from September 2003 until incorporation in 2006.

Services

We provide personalized confidential financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with you and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

We are strictly a fee-only financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products.

The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted.

We accept discretionary authority to manage securities accounts on behalf of clients. We have the authority to determine, without obtaining your specific consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. We do not act as a custodian of client assets. You always maintain asset control. We place trades for you under a limited power of attorney.

A written evaluation of your initial situation is provided to you, often in the form of a net worth statement. Quarterly reviews are conducted for investment portfolio and communicated to you. Planning issues other than investment portfolio are conducted on an as needed basis.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by you on an as-needed basis. Conflicts of interest will be disclosed to you in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to you.

Our Principal Owner

Rajendran Revocable Family Trust is the sole shareholder. Annamalai & Santhi Rajendran are the trustees.

Types of Advisory Services

We provide investment supervisory services, also known as asset management services; manage investment advisory accounts not involving investment supervisory services and furnish investment advice through consultations.

Manage portfolio of assets:

- Emphasize asset allocation and diversification. This is key to long run success.
- Assess client's risk profile periodically and adjust the portfolio accordingly.

- Allocation between bonds and equities are established or changed with client's concurrence; however sub allocations within equity and within bonds are made without prior consultation with you.
- Once established, portfolio changes, in general will be minor. We do not recommend "market timing"
- All the monies will be in client's names.
- Invest mostly via low cost mutual funds or ETFs
- In general, do not recommend individual stocks.
- Based on client's availability, will hold face-to-face meetings quarterly and review performance.

Perform tax planning and risk planning as required

Co-ordinate estate planning with estate planning attorney.

Emphasize low cost, tax efficiency, diversification and staying the course

On more than an occasional basis, we furnish advice to you on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

Financial Planning

Depending on your needs and interests, we may provide advice in the form of a Financial Plan. The Financial Plan will assess the likelihood of you achieving various goals and objectives dependent on various personal and financial assumptions, including portfolio design, lifestyle, work and retirement plans, pursuit of charitable and/or family goals and normal savings and consumption behavior. Depending on your needs, the Plan may also address elements of tax and estate planning and insurance, including life, disability, health and long term care insurance.

Assets under Management

As of December 31, 2023, we managed approximately \$211,708,046 in assets for approximately 50 clients on a discretionary basis

Tailored Relationships

The goals and objectives for you are documented as a result of our discussions.

Our Agreement with you may not be assigned without your consent.

Types of Agreements

The following agreements define the typical client relationships.

Asset Management Agreement

Assets are invested primarily in no-load and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages charge a transaction fee for the purchase and sale of funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. We do not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), and U. S. government securities.

Termination of Advisory Service Agreement

The contract may be terminated by either party upon (30) thirty days prior written notice to the other party.

Financial Planning Agreement

Occasionally, we engage in a planning-only agreement.

A financial plan is designed to help you with all aspects of financial planning.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at your discretion.

Hourly Planning Engagements

Occasionally, we provide hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$500.

Termination of Financial Planning Agreement

You may terminate any of the aforementioned agreement at any time by notifying us in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If you made an advance payment, we will refund any unearned portion of the advance payment.

We may terminate any of the aforementioned agreements at any time by notifying you in writing. If you made an advance payment, we will refund any unearned portion of the advance payment.

Item 5: Fees and Compensation

Description

We base our fees on a percentage of assets under management, hourly charges, and fixed fees (not including subscription fees). Financial plans are priced according to the degree of complexity associated with your situation.

We, in our sole discretion, may waive our minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with you, etc.).

Asset Management Fee

The annual Asset Management Agreement fee is based on a percentage of the investable assets according to the following schedule:

For investable assets under \$5,000,000:

- 1.00% on the first \$1,000,000;
- 0.80% on the next \$1,500,000;
- 0.60% on the assets above \$2,500,000;

For investable assets greater than \$5,000,000:

- 0.60% on all of the assets up to \$10,000,000;
- 0.40% on assets above \$10,000,000.

Financial Planning Fees

The fee for a financial plan is predicated upon the facts known at the start of the engagement. The minimum fee is \$1,000 (the fee range is \$5,000 to \$10,000). Since financial planning is a discovery process, situations occur wherein you are unaware of certain financial exposures or predicaments.

In the event that your situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. You must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary for up to one month. Follow-on implementation work is billed separately at the rate of \$500 per hour.

Fee Billing

Investment management fees are billed quarterly, in arrears, based on the value of the account on the last business day of the previous quarter, as adjusted for inflows and outflows throughout the quarter, meaning that we invoice you after the billing period has ended. Payment in full is expected upon invoice presentation. Fees are usually deducted from an account designated by you to facilitate billing. You must consent in advance to direct debiting of your investment account.

If engaged on an hourly-basis, fees for financial plans are billed 50% in advance, with the balance due upon delivery of the financial plan.

There is a minimum quarterly fee of \$4,500 for investment management clients. However, the minimum fee may be waived at the discretion of the advisor.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to us.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Past due Accounts and Termination of Agreement

We reserve the right to stop work on any account that is more than 30 days overdue. In addition, we reserve the right to terminate any financial planning engagement where you have willfully concealed or have refused to provide pertinent information about financial situations when necessary and appropriate, in our judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded.

Item 6: Performance Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Item 7: Types of Clients

Description

We generally provide investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

For additional information on fees please see Item 5. Fees and Compensation.

Client relationships vary in scope and length of service.

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

Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Investment Strategies

The primary investment strategy used on your accounts is strategic allocation amongst asset classes. Major asset classes used are equities and bonds. There are sub-asset classes within equity and within bond asset classes. Equity asset class is globally diversified across US domestic, International Developed and Emerging markets. Bonds are usually short to intermediate duration. The vehicles used are mutual funds and ETFs. We mostly use passively-managed funds. We also do use some actively-managed funds.

The allocation between equities and bonds for you is based upon the objectives stated by you during consultations. You may change these objectives at any time and accordingly the split between equities and bonds may be changed. Any allocation change between equities and bonds is made with your concurrence. However, changes within sub asset classes are communicated to you after the fact via quarterly reports.

We do not buy individual stocks or bonds in place of mutual funds or ETFs unless specifically requested by clients. We do sell and liquidate individual stocks and bonds transferred in by you, in consultation with

you. In general, the investment portfolios are not concentrated but diversified, do not employ market timing and do not employ leverage.

Other strategies may include long-term purchases, short-term purchases and trading.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind.

Investors face the following investment risks:

Portfolios likely will have some small cap bias and value bias; such bias may generate higher returns, but for sure they increase the volatility risk.

Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Pandemic Risk – Large-scale outbreaks of infectious disease that can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.

Item 9: Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10: Other Financial Industry Activities and Affiliations

As a fiduciary, Family CFO, Inc. has certain legal obligations, including the obligation to act in clients' best interest. Family CFO, Inc. maintains a Business Continuity and Succession Plan and seeks to avoid a disruption of service to clients in the event of an unforeseen loss of key personnel, due to disability or death. To that end, Family CFO, Inc. has entered into a succession agreement with a certain Registered Investment Adviser, effective October 5, 2015. Family CFO, Inc. can provide additional information to any current or prospective client upon request to Raj Rajendran, President at 650-218-3551 or raj@familycfoinc.com

Financial Industry Activities

We are not involved in any other financial industry activities. We do not recommend or select other advisors.

Affiliations

We have no arrangements that are material to our advisory business or you with any other entity.

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

Code of Ethics

We have adopted a Code of Ethics. The Code sets forth our expectations of as respects standards of conduct, fiduciary duties, required compliance with all securities regulations, required reporting of personal trading, pre-approval of participation in any initial public offering or private placement, required reporting of violations of the Code to the Chief Compliance Officer, and required written acknowledgement of receipt of the Code by personnel. A copy of the Code of Ethics is available to you and prospects upon request.

Participation or Interest in Client Transactions

We and our employees may buy or sell securities that are also held by you. Employees may not trade their own securities ahead of your trades. Employees comply with the provisions of our Compliance Manual.

Personal Trading

The Chief Compliance Officer is Annamalai Rajendran. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that you receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Item 12: Brokerage Practices

Selecting Brokerage Firms

The firm currently implements our investment management services through Charles Schwab & Co. Inc. (“Schwab”), Vanguard Group of companies, Dimensional Fund Advisors, and American Funds.

We do not have any affiliation with product sales firms. Specific custodian recommendations are made to you based on your need for such services. We recommend custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

We do not receive fees or commissions from any of these arrangements.

As stated above, we sometimes recommend Charles Schwab & Co., Inc. (“Schwab”), a registered broker-dealer, member SIPC, as the qualified custodian.

Family CFO is independently owned and operated and is not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as a custodian, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so.

Products and services available to the Firm from Schwab

Schwab Advisor Services™ is Schwab’s business serving independent investment advisory firms like us. Schwab provides Family CFO and our clients with access to institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts while others help us manage and grow our business. Schwab’s support services described below are generally available on an unsolicited basis (i.e., we do not have to request them) and at no charge to us. Here is a more detailed description of Schwab’s support services:

Services that Benefit Clients Directly

Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit each client.

Services that May Not Directly Benefit Clients

Schwab also makes available to us other products and services that benefit us but may not directly benefit a specific client. These products and services assist us in managing and administering our clients’ accounts. They include investment research, both Schwab’s own and that of third parties. We use this research to service all or a substantial number of our clients’ accounts. In addition to investment research, Schwab also makes available software and other technology that:

- Provides access to client account data (such as trade confirmations and account statements);
- Facilitates trade execution and allocate aggregated trade orders for multiple client accounts;
- Provides pricing and other market data;
- Facilitates payment of our fees from our clients’ accounts; and

- Assists with back-office functions, recordkeeping and client reporting.

Services that Generally Benefit Only Us

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include (among others) the following:

- Educational conferences and events
- Technology, compliance, legal, and business consulting
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants and insurance providers

Schwab will provide some of these services itself or will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third-party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

Our Interest in Schwab's Services

The availability of the services described above from Schwab benefits us because we do not have to produce or purchase them. They are not contingent upon Family CFO committing any specific amount of business to Schwab in trading commissions or assets in custody. The fact that we receive these benefits from Schwab is an incentive for us to recommend the use of Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate our recommendation of Schwab as a custodian and broker is in the best interest of our clients. Our selection is primarily supported by the scope, quality and price of Schwab's services, and not Schwab's services that benefit only us.

Best Execution

Family CFO has a fiduciary obligation of best execution. Family CFO will perform annual evaluations of the performance of broker/dealers executing client transactions. This evaluation may just be a review of the studies done by AAII (American Association of Individual Investors) or Barron's or some such entity.

Soft Dollars

We do not receive any soft dollars.

Family CFO does receive the usual discounts available to advisers that use Schwab, Vanguard, DFA, and American Funds as custodian.

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

Trade Errors

From time-to-time we may make an error in submitting a trade order on your behalf. When this occurs, we may place a correcting trade with the broker-dealer which has custody of your account. If an investment gain results from the correcting trade, the gain will remain in your account unless the same error involved other client account(s) that should have received the gain, it is not permissible for you to retain the gain, or we confer with you and you decide to forego the gain (e.g., due to tax reasons). Our

policy is that you will not bear any loss resulting from errors committed by us or our third-party service providers.

Item 13: Review of Accounts

Periodic Reviews

Account reviews are performed quarterly by Annamalai Rajendran. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in your own situation.

Regular Reports

Clients receive communications each quarter from their custodian.

Item 14: Client Referrals and Other Compensation

Incoming Referrals

We have been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

Referral Fees Paid

We do not compensate any one for client referrals.

Referrals Out

We do not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Other Compensation

We do not receive any commissions or referral fees for any recommendations we make to other professionals.

Item 15: Custody

Account Statements

Custody means holding, directly or indirectly, client funds or securities or having any authority to obtain possession of them.

Family CFO does not have direct custody of any client funds and/or securities. Family CFO will not maintain physical possession of client funds and securities. Instead, clients' funds and securities are held by a qualified custodian.

While Family CFO does not have physical custody of client funds or securities, payments of fees may be paid by the custodian from the custodial brokerage account that holds client funds pursuant to the client's account application.

In certain jurisdictions, the ability of Family CFO to withdraw its management fees from the client's account may be deemed custody. Prior to permitting direct debit of fees, each client provides written authorization permitting fees to be paid directly from the custodian.

As part of the billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period. The custodian does not calculate the amount of the fee to be deducted and does not verify the accuracy of Family CFO's advisory calculation. Therefore, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation. Clients should contact Family CFO directly if they believe that there may be an error in their statement.

Custody is also disclosed in Form ADV because Family CFO has authority to transfer money from client account(s), which constitutes a standing letter of authorization (SLOA). The firm endeavors to comply with the SEC no-action letter to the Investment Adviser Association dated February 21, 2017 in this regard.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by us.

Item 16: Investment Discretion

Discretionary Authority for Trading

We accept discretionary authority to manage securities accounts on your behalf. We have the authority to determine, without obtaining your specific consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

You approve the custodian to be used and the commission rates paid to the custodian. We do not receive any portion of the transaction fees or commissions paid by you to the custodian.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment strategy that we have agreed upon.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute trades.

Item 17: Voting Client Securities

Proxy Votes

We do not vote proxies. Therefore, although we may provide investment advisory services relative to your investment assets, you maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by you shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to your investment assets. We and/or you shall correspondingly instruct each custodian of the assets to forward to you copies of all proxies and shareholder communications relating to your investment assets.

Item 18: Financial Information

Financial Condition

We do not have any financial impairment that will preclude the firm from meeting contractual commitments to you.

A balance sheet is not required to be provided because we do not serve as a custodian for your funds or securities, and do not require prepayment of fees of more than \$1,200, and six months or more in advance. We have never been the subject of a bankruptcy petition.

Privacy Notice

We are committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us. The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf. We also share such information with a third party that provides back office support to generate the portfolio reports. This relationship is governed by a confidentiality agreement.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal

information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information will be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this Privacy Notice to you annually, in writing.