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This Brochure provides information about the qualifications and business practices of FinSym Partners, LLC. If you have any questions about the contents of this Brochure, you may contact us at (206) 510-9234, or email [brent@finsymllc.com](mailto:brent@finsymllc.com), to obtain answers and additional information. FinSym Partners, LLC is a registered investment advisor with the United States Securities and Exchange Commission ("SEC"). Registration of an investment adviser does not imply any level of skill or training. The information in this Brochure has not been approved or verified by the SEC, the State of Washington or any other state securities regulating body.

Additional information about FinSym Partners, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The firm's IARD number is 153712.

## Item 2 Material Changes

FinSym Partners is required to advise clients and prospective clients of any material changes to this Brochure since our last annual update. Since our last annual update in January 2023, we have made the following material changes:

- **Item 12 – Brokerage Practices:**
  - TD Ameritrade was acquired by Charles Schwab & Co., Inc. Consequently, beginning September 5, 2023, we transitioned from TD Ameritrade's broker/dealer and custodian services to Charles Schwab for all our clients' accounts. The two platforms offer similar services at comparable prices and the conflicts of interest present with Schwab are not materially different from TD Ameritrade.
  - We have added additional details about the benefits we receive through Schwab's institutional advisor platform. These benefits create a conflict of interest in that they give us incentive to recommend Schwab over another custodian with whom we do not have institutional access. We discuss these benefits and conflicts in Item 12 of our Brochure.

We have other, non-material changes throughout this Brochure to clarify our practices and other disclosures. We encourage you to read our Brochure in its entirety.

Clients will receive an annual summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year, typically April 30. At that time, we will offer a copy of our most current Disclosure Brochure. We will also promptly provide ongoing disclosure information about material changes, as necessary. Please note that we do not have to provide this information to a client or prospective client who has not received a previous version of our Brochure.

### Item 3 Table of Contents

Item 2	Material Changes	2
Item 3	Table of Contents	3
Item 4	Advisory Business	4
Item 5	– Fees and Compensation	6
Item 6	– Performance-Based Fees and Side-By-Side Management	7
Item 7	– Types of Clients	7
Item 8	– Methods of Analysis, Investment Strategies and Risk of Loss	8
Item 9	– Disciplinary Information	12
Item 10	– Other Financial Industry Activities and Affiliations	13
Item 11	– Code of Ethics, Participation or Interest in Client Transaction & Personal Trading	13
Item 12	– Brokerage Practices	14
Item 13	– Review of Accounts	19
Item 14	– Client Referrals and Other Compensation	19
Item 15	– Custody	19
Item 16	– Investment Discretion	20
Item 17	– Voting Client Securities	20
Item 18	– Financial Information	21

## **Item 4 Advisory Business**

### **Firm Description**

FinSym Partners, LLC (“FinSym Partners” “we” “us” and “Advisors”) is an independent financial planning and investment management firm. We are a Washington Limited Liability Company and registered as an investment advisor with the Securities and Exchange Commission (“SEC”). Our principal place of business is located in Seattle, Washington. FinSym Partners began conducting business as an independent investment advisory firm in 2010. Robert Davidson is the founder and President of FinSym Partners. On January 1, 2016, Brent Davidson became a partner of the firm. Robert and his brother, Brent Davidson each have 50% ownership interest in the firm.

### **Types of Advisory Services**

FinSym Partners offers Clients a comprehensive approach to wealth management and provides a variety of personalized financial and investment advisory services to our Clients.

Investment advice is an integral part of our services. Initially an analysis is done of a Client’s existing assets and investment portfolio in conjunction with an assessment of their investing goals and objectives. Next, we prepare a customized, high-level portfolio with equity and/or fixed income targets in the form of an Investment Policy Statement (IPS) is created based on a Client’s risk tolerance, return expectations, and time horizon. After agreement on the IPS, we prepare and implement the Client’s specific portfolio, taking into consideration among other things tax implications of current investments. FinSym Partners typically has discretionary authority to trade the account using a limited power of attorney.

Following implementation, the investment portfolio is monitored and rebalanced in accordance with the Client’s objectives. Periodically, new investments and strategies suitable for use within the investment portfolio are evaluated. Typically, an investment performance review is provided quarterly to each client.

### **Financial Planning Services**

FinSym Partners, LLC provides financial planning to our Clients as part of our overall advisory services. The plan considers all of the Client’s assets, liabilities, goals and

objectives. 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 the discretion of the client.

### **Client-Tailored Relationships**

Our advice and services are tailored to the stated objectives of each Client. As we explain above, we develop a written IPS for each client. The IPS is informed by the client's financial plan and emotional tolerance for risk. It serves as the foundational roadmap for the investment portfolio. Developing and consistently adhering to an investment policy allows our clients to focus on the long-term goals of their financial plan, rather than become caught up in the short-term movements of the equity markets. All transactions in a Client's account are made in accordance with the directions and preferences provided to us by the Client.

In order to best serve their needs, we encourage our Clients to notify us of any life events or financial changes that could affect their individual financial circumstances and needs.

### **Important Information for Retirement Investors**

When we recommend that you roll over retirement assets or transfer existing retirement assets (such as a 401(k) or an IRA) to our management, we have a conflict of interest. This is because we will generally earn additional revenue when we manage more assets. In making the recommendation, however, we do so only after determining that the recommendation is in your best interest. Further, in making any recommendation to transfer or rollover retirement assets, we do so as a "fiduciary," as that term is defined in ERISA or the Internal Revenue Code, or both. We also acknowledge we are a fiduciary under ERISA or the Internal Revenue Code with respect

to our ongoing investment advisory recommendations and discretionary asset management services, as described in the advisory agreement we execute with you. To the extent we provide non-fiduciary services to you, those will be described in the advisory agreement.

### **Participation in Wrap Fee Programs**

We do not participate in or sponsor any wrap-fee programs.

### **Assets Under Management**

As of December 31, 2023, FinSym Partners managed a total of \$136,151,582 of Client assets of which \$131,293,128 is on a discretionary basis and \$4,858,455 on a non-discretionary basis.

## **Item 5 – Fees and Compensation**

We are compensated for our services in accordance with “Schedule A” of our Investment Advisory Agreement (“IAA”) that each Client enters into at the beginning of our professional engagement. Fees may only be modified with Client notification and consent as permitted by our IAA.

### Standard Fee Schedule

1.00% on assets up to \$750,000

0.75% on assets between \$750,000 and \$1,500,000

0.50% on assets over \$1,500,000

For defined benefit or retirement plan assets, which are not held by our recommended independent custodian, we charge .50%, which is assessed to that portion of a Client’s portfolio held away.

Our fees are negotiable.

Fees for each quarter are paid at the end of the quarter based on the total value of assets under management at the close of trading on the last business day of the quarter. The fee will be equal to the agreed upon rate per annum (set forth in the IAA entered into each Client), times the market value of the account, divided by four, the quarters in a

year. The market value will be construed to equal the sum of the values of all assets in the account, not adjusted by any margin debit.

Fees for partial quarters at the commencement or termination will be billed on a pro-rated basis contingent on the number of days the account was open during the quarter.

FinSym Partners deducts fee directly from the Client's account custodian as authorized by the IAA and custodian paperwork. Payment of fees may result in the liquidation of a Client's securities if there is insufficient cash in the account. For purposes of determining value, we will rely on your custodian's valuation as of the end of the calendar quarter.

Each Client's account custodian charges fees, which are in addition to and separate from the investment advisory service fee we charge. All brokerage commissions, stock transfer fees, and other similar charges incurred in connection with transactions for the account will be paid out of the assets in the account and are in addition to the investment management fees paid to us. Clients bear responsibility for verifying the accuracy of fee calculations. In addition to our fee, Clients also pay a proportionate share of any mutual fund's fees and charges.

FinSym Partners is a fee-only advisor meaning we do not receive any compensation from the sale of securities or other investment products. We do not sell commissioned products; we are not affiliated with entities that sell financial products or securities; no commissions in any form are accepted; and no finder's fees are accepted or paid for client referrals.

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

We do not charge any performance-based fees for our services. Accordingly, this item is not applicable to our firm.

#### **Item 7 – Types of Clients**

FinSym Partners provides investment advice and portfolio management to individuals, some percentage of whom are high net worth individuals, as well as trusts, and estates. We also work with employer retirement plan sponsors.

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

### Methods of Analysis

FinSym Partners provides investment guidance on a wide range of investment securities including (but not limited to) the following:

- Investment company securities such as mutual fund shares
- Equity securities such as:
  - Exchange-listed securities
  - Securities traded over-the-counter
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- United States government securities
- Private company partnerships and investments
- Interests in partnerships investing in real-estate

Our core investing philosophy centers on extensive financial science and research and a belief in efficient capital markets. Based on this research, FinSym Partners employs investing strategies that adhere to the following principles:

- Risk and return are highly correlated; providing investors with investments that match their risk/return profile is a core tenet of FinSym Partners
- Asset allocation and diversification are key determinants of a portfolio's risk and return, and FinSym Partners provides Client with highly diversified portfolios and an asset allocation that is tailored to their specific objectives
- Structured investing (passive investing or indexing) is the preferred investing style versus active investing which is based on speculative stock picking and market timing
- Value and small capitalization stocks have historically outperformed growth and value stocks. Consequently, we tend to overweight portfolios in value and small cap stocks.
- Companies that have higher profits have historically outperformed the general market. So, we also overweight portfolios with high profit companies.



We primarily use fundamental analysis for research and review of securities including mutual funds. The main sources of information we rely on to provide advice include financial publications, research materials prepared by others, annual reports, prospectuses, filings with the Security and Exchange Commission, and company press releases. We also subscribe to various professional publications deemed to be consistent and supportive of our investment philosophy.

### **Investment Strategies**

FinSym Partners' primary investment strategy is centered on long-term purchases (securities held at least one year) but may include short-term purchases (securities sold within a year).

We focus on developing a customized investing strategy that targets an appropriate return commensurate with the associated level of risk. To achieve this, we build portfolios containing multiple assets classes (e.g., value funds, small-cap funds, international market funds, etc.). We focus on investments that do not rely on stock picking and market timing to achieve their returns. In doing so we seek to reduce risk and lower cost associated with actively managed portfolios.

### **Risk of Loss**

We will use our best judgment and good faith efforts in rendering services to Client. However, we cannot warrant or guarantee any particular level of account performance, or that account will be profitable over time. Not every investment decision or recommendation made by Advisor will be profitable. Clients assume all market risk involved in the investment of account assets under the Investment Advisory Agreement and understand that investment decisions made for this account are subject to various market, currency, and economic, political and business risks. Because Clients assume all market risk involved in the investment of account assets, they must understand that investing in securities involves risk of loss that each Client should be prepared to bear.

Below are some of the risks present with investing generally, as well as some key risks of different types of investments. In general, investing in securities with concentrated exposures to (i) particular asset class(es) and/or (ii) a particular sector and/or (iii) one or a select few markets involves greater risk than investing in investments that have greater diversification.

Asset Allocation Risk: The primary risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the proportions of different asset types will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals. We mitigate this risk through quarterly reviews and rebalancing.

Diversification Risk: The chance an investment's performance may be hurt disproportionately by the poor performance of an investment's holdings – the use of indexed funds is not guaranteed to track an intended market and may carry additional product risks.

Equity Risk: Prices of common stock react to the economic conditions of the company that issued the security; industry and market conditions; as well as other factors, and may fluctuate widely. Investments related to the value of stocks may rise and fall based on an issuer's actual and anticipated earnings, changes in management, the potential for takeovers and acquisitions, and other economic factors. Similarly, the value of other equity-related securities, including preferred stock, warrants and options may also vary widely. Market conditions may affect certain types of stocks (such as large-cap or technology-related) to a greater extent than other types of stocks. If the stock market declines, the value of a portfolio will also likely decline and, although stock values can rebound, there is no assurance that values will return to previous levels.

Exchange-Traded Funds: Exchange-traded funds ("ETFs") are funds bought and sold on a securities exchange that attempt to track the performance of a specific index (such as the S&P 500), a commodity, or a basket of assets (such as a set of technology-focused, country-specific, or other sector-specific stocks). The risks of owning an ETF generally reflect the risks of owning the underlying securities they are designed to track, although lack of liquidity in an ETF could result in its being more volatile than the underlying securities. ETFs have management fees that increase their costs. ETFs are also subject to other risks, including: the risk that their prices may not correlate perfectly with changes in the underlying index (tracking error); the risk that the ETF will trade at prices that differ, sometimes materially,

from the ETF's net asset value; and illiquidity risk, especially for narrowly-focused ETFs, including the risk of possible trading halts due.

Fixed Income Risk: Prices of fixed income instruments (e.g., bonds) can exhibit some volatility and change daily. Investments in fixed income instruments present numerous risks, including credit, interest rate, reinvestment and prepayment risk, all of which affect the price of the instruments. For instance, a rise in interest rates will generally cause the price of bonds to go down. If the security is held to maturity and the issuer does not default, the client should receive the face amount of the bond at the maturity date, as well as stated interest payments while the bond is held. In this case, the change in price prior to maturity may not affect the client. If the client needs to sell prior to maturity, however, the investor will likely experience a loss. Where a client's fixed income exposure is to bond funds or fixed-income ETFs, the fund or ETF does not itself "mature," although different issues held by the fund/ETF will mature and will experience price fluctuations. Investors are therefore highly dependent on the manager's ability to accurately anticipate the impact of rate changes and to appropriately manage the portfolio to achieve both adequate returns and reasonable risk. When the US experiences a prolonged period of low interest rates, future increases in rates could have a material negative impact on the value of current fixed income holdings. In addition, the value of fixed income instruments may decline in response to events affecting the issuer, its credit rating or any underlying assets backing the instruments.

Inflation Risk: When 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. This affects all investments, but longer-term fixed income securities are particularly susceptible.

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. This risk is especially significant for existing holdings. Longer-term fixed income securities are particularly susceptible to this risk.

Market Risk: The price of any security, including ETFs, equities, bonds or mutual funds 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.

Mutual Funds: These are professionally managed investments that pool money from multiple investors to purchase securities. Mutual funds may be broad-based (e.g., focused on the market overall, or focused on large-capitalization companies), or they can be narrower in scope, such as those focused on the technology industry or the securities of specific country. The risks of mutual funds are generally connected to the risks of the underlying securities they hold. Mutual funds do not trade on an exchange but are priced daily based on the net asset value of the securities held in the fund. Investors buy or sell fund shares based on that end-of-day price.

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 bonds, notes, and similar securities.

Sector Risk: the chance that significant problems will affect a particular sector, or that returns from that sector will trail returns from the overall market; and style risk (for example growth investing risk and mid-cap company risk).

Small- and Mid-Cap Company Risk: Investments in small- and mid-cap companies may be riskier than investments in larger, more established companies. The securities of these companies may trade less frequently and in smaller volumes than securities of larger companies. Small- and mid-cap companies may be more vulnerable to economic, market, and industry changes.

## **Item 9 – Disciplinary Information**

We are required to disclose all material facts regarding any legal or disciplinary event that would be material to your evaluation of our firm, or the integrity of our management. We have no information to disclose applicable to this Item.

## Item 10 – Other Financial Industry Activities and Affiliations

The principal business of FinSym Partners is that of a registered investment advisor. We do not participate in any other financial industry activities or affiliations.

## Item 11 – Code of Ethics, Participation or Interest in Client Transaction & Personal Trading

FinSym Partners has adopted a Code of Ethics, which outlines proper conduct related to all services provided to Clients. The Code covers a range of topics including general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code, and review and enforcement processes. Current or prospective Clients may request a copy of the firm's Code of Ethics by contacting Brent Davidson at (206) 510-9234 or [brent@finsymllc.com](mailto:brent@finsymllc.com).

FinSym Partners or individuals associated with our firm may buy and sell some of the same securities for their own account that we buy and sell for our Clients. In all instances, where appropriate FinSym Partners or individuals associated with our firm will purchase a security for all of our existing accounts for which the investment is appropriate before purchasing any of the securities for our own account and, likewise, when we determine that securities should be sold, where appropriate will cause these securities to be sold from all of its advisory accounts prior to permitting the selling of the securities from its accounts. In some cases we may buy or sell securities for its own account for reasons not related to the strategies adopted by our Clients.

Occasionally, we may recommend, buy and/or sell securities for our personal accounts that we may also recommend for our Client portfolios. However, there is no conflict of interest or commingling of funds, as the securities are widely held and publicly traded, and we are too small an advisor/investor to affect the market. In all cases, we place the Client's interest ahead of our own.

FinSym Partners has established the following restrictions in order to ensure its fiduciary responsibilities:

1. Associated persons of FinSym Partners will not buy or sell securities for his personal portfolio where his decision is substantially derived, in whole or in part, by reason of his employment unless the information is also available to the investing public or reasonable inquiry. No associated person of FinSym Partners shall prefer his or her own interest to that of the advisory Client.
2. Advisor maintains a list of all securities holdings for associated persons. An appropriate officer of the Advisor reviews these holdings on a regular basis.
3. Advisor emphasizes the unrestricted right of the Client to decline to implement any advice rendered.
4. Advisor requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.

## Item 12 – Brokerage Practices

FinSym Partners does not maintain custody of your assets, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account to pay our fees or to direct funds to third parties you authorize (see Item 15—Custody, in this brochure). In all cases, client assets must be held with a “qualified custodian,” generally a broker-dealer or a bank. We recommend Charles Schwab & Co., Inc. (“Schwab”), a registered broker-dealer, member SIPC, as the qualified custodian. We will work with another custodian only for employer retirement plan clients, e.g., 403(b) and 401(k) plan sponsors.

We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities as we instruct them to. While we recommend you use Schwab, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We don’t open the account for you, though we assist you with the process and handle the administrative aspects.

When considering whether the terms Schwab provides are overall most advantageous to you when compared with other available providers and their services, we take into account a range of factors, including:

- Combination of transaction execution services and asset custody services, generally without a separate fee for custody
- Capability to execute, clear, and settle trades
- Capability to facilitate transfers and payments to and from accounts
- Breadth of available investment products
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services and willingness to negotiate prices
- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Services delivered or paid for by Schwab
- Availability of other products and services that benefit us, as discussed below

### **Schwab's Brokerage and Custody Costs**

Schwab generally does not charge clients separate for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Schwab is also compensated by earning interest on the uninvested cash in Schwab's Cash Features Program or on any margin balance maintained in Schwab accounts, and from other ancillary services.

Most trades no longer incur commissions, though there are exceptions. Schwab discloses its fees and costs to clients, and we take those costs into account when executing transactions on your behalf. Schwab charges you a flat dollar amount as "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought, or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute trades for your account.

Certain mutual funds and ETFs are also made available for no transaction fee; as a result many confirmations show "no commission" for a particular transaction. Typically, the custodian (but not FinSym Partners) earns additional remuneration from such services as recordkeeping, administration, and platform fees, for the funds and ETFs on their no-transaction fee lists. This additional revenue for the custodian will tend to increase the

internal expenses of the fund or ETF. FinSym Partners selects investments based on our assessment of a number of factors, including liquidity, asset exposure, reasonable fees, effective management, and low execution cost. Where we choose a no-transaction fee fund or ETF, it is because it has met our criteria in all applicable categories.

### **Products and Services Available to Us from Schwab**

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like FinSym Partners. They provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), some of which are not typically available to Schwab retail customers. Certain retail investors, though, may be able to get institutional brokerage services from Schwab without going through us or another advisor. 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 are generally available on an unsolicited basis (we don't have to ask for them) and at no charge to us. Following is a more detailed description of Schwab's support services.

### **Schwab's Services that Benefit Clients**

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. These services generally benefit you and your account.

### **Schwab's Services that do not Directly Benefit Clients**

Schwab also makes available to us other products and services that benefit us but do not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts and operating our firm. 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, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provides access to client account data



- Facilitates trade execution, rebalancing, and the allocation of blocked orders for multiple accounts
- Provide pricing and other market data
- Facilitate payment of FinSym Partners' fees directly from your account, if authorized in your advisory agreement
- Assistance with back-office functions, recordkeeping and client reporting

### **Schwab's Services that Generally Benefit Only Us**

Schwab also offers other services intended to help us manage and further develop our business enterprise, a number of which we make no use of (such as access to employee benefits providers and marketing consulting) but which are available. The services we do tend to make use of include:

- Consulting on technology and business needs
- Consulting on legal and related compliance needs
- Educational conferences and events
- Publications and conferences on practice management, business management, and industry data

Schwab provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. If you did not maintain your account with Schwab, we would be required to pay for these services from our own resources. The software, technology, and account access Schwab provides create an operational and compliance benefit for FinSym Partners that does not necessarily translate directly into a client benefit. The availability to FinSym Partners of Schwab's products and services is not contingent upon us committing to custodian any specific amount of business (assets in custody or trading commissions).

While we believe that Schwab is quite competitive and provides good value to our clients overall, the efficiencies provided to FinSym Partners create an incentive for us to recommend Schwab over other custodians, even though other custodians offer similar services and support. This incentive could indirectly influence our choice of broker-dealer for custody and brokerage services. In some cases, clients could pay more through the custodian we recommend than through others.

As part of our fiduciary duty to our clients, we endeavor at all times to put the interest of our clients first. We review Schwab's financial health, capacities, additional services, and costs periodically to ensure that our clients are receiving quality executions and competitive pricing, as well as more intangible service benefits. We believe our selection of Schwab as custodian and brokers is in the best interest of our clients because of the scope, quality, and price of their services.

### **Directed Brokerage**

Because we execute your investment transactions through the custodian holding your assets, we are effectively requiring that you "direct" your brokerage to your custodian, absent other specific instructions as discussed below. Because we are not choosing brokers on a trade-by-trade basis, we may not be able to achieve the most favorable executions for clients and this may ultimately cost clients more money. Not all investment advisers require directed brokerage.

We do not use, recommend, or direct activity to brokers in exchange for client referrals. We only use a client's chosen custodian, not Schwab, when it's an employer retirement plan. Working with an outside custodian gives us little or no ability to negotiate commissions or influence execution price. This may result in greater costs to you.

### **Aggregated or Block Transactions**

We do not typically aggregate client transactions with those of other client accounts at the same custodian. Aggregation, or block trading, is where a block of client trades are executed together and billed at the same price. Given that we primarily buy and sell mutual funds and ETFs for our client portfolios, we don't find block trading offers a material cost advantage for our clients.

### **Best Execution**

As indicated above, we typically require that clients open brokerage/custodial accounts at custodians not affiliated with us – typically Schwab. We are not compensated directly for recommending custodians to clients, though we may receive indirect economic benefits from those custodians as outlined above. The criteria for recommending a custodian include reasonableness of commissions and other costs of trading, ability to facilitate trades, securities lending needs, access to client records, computer trading

support and other operational considerations. These factors will be reviewed from time to time to ensure that the best interests of our clients are upheld.

In seeking “best execution” for clients, the key factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, considering the full range of services, including execution capability, technological processes used for submitted trades and other valuation services.

### **Item 13 – Review of Accounts**

Accounts are reviewed by Robert Davidson or Brent Davidson. The frequency of reviews is based on the Client’s investment objectives, but generally occurs no less than annually. In addition, we periodically revisit each Client’s goals and objectives to ensure that we are on track. This level of attention to each Client’s account enables us to respond quickly if there is a change to a Client’s financial position.

Special reviews are conducted when material changes occur, such as a change in a Client’s investment objectives, tax considerations, large deposits or withdrawals, large sales or purchases, loss of confidence in corporate management, or changes in the macro-economic climate.

All investment advisory Clients receive quarterly reports from FinSym Partners reflecting their managed portfolios. Investment advisory clients also receive routine account statements from the custodian of their accounts on a monthly or quarterly basis.

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

FinSym Partners has no arrangements, written or oral, in which it compensates any individuals or entities for referrals of clients, nor are there arrangements by which other economic benefits (such as sales awards or incentives) are derived.

### **Item 15 – Custody**

FinSym Partners’ clients’ funds and securities are maintained with a qualified custodian; we don’t take physical possession of client assets. You will receive account statements and transaction confirmation notices directly from the custodian at least quarterly,

which you should carefully review. We urge you to carefully compare the custodian's account statements with the periodic reports you receive from us and to notify us promptly of any discrepancies.

We have the ability to deduct our advisory fees directly from your accounts based on your written authorization to do so, and this ability is technically considered "custody" but doesn't require separate reporting or a surprise audit of FinSym Partners.

In some cases clients execute standing letters of authorization ("SLOAs"), which are written directives from the client authorizing us to initiate payments from their custodial accounts to client-specified third parties. Although SLOAs are client-initiated and client-authorized, our ability to facilitate the payments covered by the SLOAs is considered "custody" under SEC guidance and requires us to report that we have custody over these account assets on our ADV 1A. To the extent the SLOAs comply with certain conditions, however, including that clients have the right to terminate the SLOA, and that the qualified custodian will confirm the status of the SLOA annually directly with the client, we are not subject to a surprise custody audit.

#### **Item 16 – Investment Discretion**

FinSym Partners accepts discretionary authority to manage securities accounts on behalf of clients. FinSym Partners has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing. If a client does not grant discretionary trading authority to FinSym Partners, we will obtain your approval of each specific transaction prior to executing investment recommendations.

#### **Item 17 – Voting Client Securities**

FinSym Partners does not vote proxies on issues held in the Client's account or receive annual reports.

## Item 18 – Financial Information

FinSym Partners does not require prepayment of fees of more than \$1,200 per client six months or more in advance, therefore disclosures required in this section to not apply to our firm.

FinSym Partners has no financial commitment that would impair or impede its ability to meet contractual and fiduciary commitments to Clients.

Neither FinSym Partners, nor our principals, has ever been the subject of a bankruptcy petition.