

Item 1: Cover Sheet

**FORM ADV PART 2A
INFORMATIONAL BROCHURE**



2101 L Street N.W.,
Suite 300
Washington, DC
20037

251 Riverside
Avenue
Westport, CT
06880

202-320-7242

www.abbingtongroup.com

January 19, 2024

This brochure provides information about the qualifications and business practices of Abbington Investment Group, LLC (“Abbington”). If you have any questions about the contents of this brochure, please contact us at 202-320-7242 or via email at info@abbingtongroup.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. Our registration does not imply a certain level of skill or training.

Additional information about Abbington Investment Group, LLC (CRD # 174407) is also available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2: Statement of Material Changes

Abbington Investment Group, LLC is required to include in this Item 2 any material changes to the Form ADV Part 2A since the last update. This ADV Part 2A is being submitted as part of the firm's annual updating amendment.

There are no material changes to disclose at the time of this amendment.

Item 3: Table of Contents

Item 1:	Cover Sheet	1
Item 2:	Statement of Material Changes	2
Item 3:	Table of Contents	3
Item 4:	Advisory Business	4
Item 5:	Fees and Compensation.....	5
Item 6:	Performance-Based Fees	7
Item 7:	Types of Clients.....	7
Item 8:	Methods of Analysis, Investment Strategies, and Risk of Loss	7
Item 9:	Disciplinary Information	10
Item 10:	Other Financial Industry Activities and Affiliations	10
Item 11:	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	11
Item 12:	Brokerage Practices	11
Item 13:	Review of Accounts	13
Item 14:	Client Referrals and Other Compensation.....	13
Item 15:	Custody.....	13
Item 16:	Investment Discretion.....	13
Item 17:	Voting Client Securities	14
Item 18:	Financial Information	14

INFORMATIONAL BROCHURE
ABBINGTON INVESTMENT GROUP, LLC

Item 4: Advisory Business

Abbingtion Investment Group, LLC has been in business since February 2014. Grace Y. Toh, Peter Van Dessel, and Joseph Connelly are the firm's principal owners.

Abbingtion provides portfolio management, and in some cases, financial planning services. Clients advised may include high net-worth individuals, individuals, families, trusts, charitable organizations and foundations, pensions, and corporations.

Asset Management for Individuals, Families, and Businesses

Abbingtion requires each client to place at least \$3,000,000 with the firm. This minimum may be waived at the discretion of Abbingtion.

Asset management services will generally be provided on a "discretionary" basis. When Abbingtion is engaged to provide asset management services on a discretionary basis, we will monitor your accounts to ensure that they are meeting your asset allocation requirements. If any changes are needed to your investments, we will make the changes. These changes may involve selling a security or group of investments and buying others or keeping the proceeds in cash. You may at any time place reasonable restrictions on the types of investments we may use on your behalf or the allocations to each security type. You will receive written or electronic confirmations from your account custodian after any changes are made to your account. You will also receive statements at least quarterly from your account custodian. Clients engaging us on a discretionary basis will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as an Investment Management Agreement that outlines the responsibilities of both the client and Abbingtion.

In limited circumstances, Abbingtion may provide asset management services on a non-discretionary basis. Services are the same as for discretionary accounts, though in non-discretionary agreements Abbingtion will receive permission from the client before implementing a recommendation.

Financial Planning

In most cases, the client will supply Abbingtion information including income, investments, savings, insurance, age, and many other items that are helpful to the firm in assessing your financial goals. The information is typically provided during personal interviews and supplemented with written information. Once the information is received, we will discuss your financial needs and goals with you and compare your current financial situation with the goals you state. Once these are compared, we will create a financial and/or investment plan to help you meet your goals.

The plan is intended to be a suggested blueprint of how to meet your goals. Not every plan will be the same for every client. Each one is specific to the client who requested it. Because the plan is based on information supplied by you, it is very important that you accurately and completely communicate to us the information

we need. Also, your circumstances and needs may change as your engagement with us progresses. It is very important that you continually update us with any changes so that if the updates require changes to your plan, we can make those changes. Otherwise, your plan may no longer be accurate.

Once you have your financial plan, the decision is yours on how to implement it. If you decide to implement your financial plan through Abbington, you will become an asset management client.

Asset Management for Institutions and Ultra-High Net Worth Clients

Institutional clients may select Abbington to manage their entire portfolio, or a specialized part of their portfolio using an Abbington proprietary investment model. When managing an entire portfolio, Abbington will address specific concerns regarding access to specialized expertise or alternative asset classes. In these cases, Abbington will either develop a plan for the account in conjunction with the client and in keeping with the client's objectives for the account or manage the assets using a proprietary model.

If you request, Abbington may recommend the services of other professionals for implementation purposes. You are under no obligation to engage the services of any such recommended professional. You retain absolute discretion over all such implementation decisions and are free to accept or reject any recommendation from Abbington. If you engage any professional recommended by Abbington, and a dispute arises thereafter relative to such engagement, you agree to seek recourse exclusively from and against the engaged professional.

Assets Under Management

As of December 31, 2023, Abbington has \$107,425,376 of discretionary assets under management across 87 client accounts and \$1,170,535 of non-discretionary assets under management across 2 client accounts.

Item 5: Fees and Compensation

A. Fees Charged

All investment management clients will be required to execute an Investment Management Agreement that will describe the type of management services to be provided and the fees, among other items. Clients are advised that they may pay fees that are higher or lower than fees they may pay another advisor for the same services and may pay lower fees for comparable services from other sources. Clients are under no obligation at any time to engage or to continue to engage, Abbington for investment services.

Asset Management

Generally, fees vary from 0.60% to 1.50% per annum of the market value of a client's assets managed by Abbington. The fee range stated is a guide. Fees are negotiable and may be higher or lower than this range, based on the nature of the account. Factors affecting fee percentages include the size of the account, the complexity of asset structures, and other factors. As discussed in Item 4, larger clients may be serviced using a variety of approaches and therefore fees for such engagements will be based on negotiations with the specific client.

Financial Planning

Financial Planning is provided as an additional service to asset management.

All clients, but especially those with smaller accounts, should be advised they may receive similar services from other professionals for higher or lower overall costs.

B. Fee Payment

Asset Management:

Investment advisory fees will be debited directly from each client's account for all accounts held at Fidelity or Schwab. The advisory fee is paid monthly, in arrears, and the value used for the fee calculation is the net value as of the last market day of the previous month. This means that if your annual fee is 1.00%, then each month we will multiply the value of your account by 1.00% and then divide by the number of days in the year (365 or 366) multiplied by the days in that month to calculate our fee. Once the calculation is made, we will instruct the custodians to deduct the fee from your account and remit it to Abbington.

The value used to calculate Abbington's fee will include any allocation to cash or cash-like instruments, such as money market funds or accounts, of the client's investable assets. Investable cash means cash that is in client accounts as an asset allocation. Cash that is not in investable cash is cash that has been identified by the client as designated for a specific purpose.

Clients will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. The client will receive a statement from their account custodian showing all transactions in their account, including the fee.

C. Other Fees

There are a number of other fees that can be associated with holding and investing in securities. You will be responsible for fees including transaction fees for the purchase or sale of a mutual fund or Exchange Traded Fund, or commissions for the purchase or sale of a stock. Expenses of a fund will not be included in management fees, as they are deducted from the value of the shares by the mutual fund manager. For a complete discussion of expenses related to each mutual fund, you should read a copy of the prospectus issued by that fund. Abbington can provide or direct you to a copy of the prospectus for any fund that we recommend to you.

Please make sure to read Item 12 of this informational brochure, where we discuss broker-dealer and custodial issues.

D. *Pro-rata* Fees

If you become a client during a month, you will pay a management fee for the number of days left in that month. If you terminate our relationship during a month, you will be entitled to a refund of any management fees for the remainder of the month. Once your notice of termination is received, we will assess pro-rated

fees for the number of days between the end of the prior billing period and the date of termination to be paid in whatever way you direct (check, wire). Abbington will cease to perform services, including processing trades and distributions, upon termination. Assets not transferred from terminated accounts within 30 (thirty) days of termination may be “de-linked”, meaning they will no longer be visible to Abbington and will become a retail account with the custodian.

E. Compensation for the Sale of Securities.

This item is not applicable.

Item 6: Performance-Based Fees

Abbington will not charge performance-based fees.

Item 7: Types of Clients

Clients advised may include individuals, families, trusts, charitable organizations and foundations, pensions, and corporations. Abbington requires each client to place at least \$3,000,000 with the firm for the discretionary program. This minimum may be waived at the discretion of Abbington.

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

It is important for you to know and remember that all investments carry risks. **Investing in securities involves the risk of loss that clients should be prepared to bear.**

Methods of Analysis and Investment Strategies

Clients' portfolios are invested in a macro-economic-environment typified by higher rates of inflation and lower inflation-adjusted levels of economic growth. We do this by focusing on the four components that drive our investment returns.

Inflation:

With over-leveraged government and private balance sheets, we continue to expect higher-for-longer rates of inflation. In this environment, we favor investments that can quickly adapt to, and even benefit from, this macroeconomic backdrop. Inflation-linked bonds and shorter-dated Treasury bills are associated assets of choice for Abbington.

Real Assets - including precious and base metals:

Resource-related equities, commodities, and energy stocks can act as a hedge against inflation. They are also a valuable source of returns during times of strong economic growth.

Equities with an international focus:

Equity markets, particularly non-US, are an attractive source of risk premia and are an important source of currency diversification (for US-domiciled investors). Having pursued economic orthodoxy and indulged less in the huge fiscal surge seen in the US, many international economies, and their associated stock markets, offer outright and relative value.

Managed Futures:

In an investment landscape where bonds no longer offer appropriate diversification and at a time when uncertainty prevails, this non-correlated return stream is a valuable portfolio diversifier.

Portfolio Structure:

We target a 12% level of portfolio volatility, that being circa 20% less than that of the S&P 500, and a 50% return (6% annualized return) for each unit of risk taken.

On occasion, we may invest according to a client's bespoke investment requirement. That objective will be agreed upon in advance with the client and asset allocations will reflect such an understanding.

Risk of Loss

There are always risks to investing. **Clients should be aware that all investments carry various types of risk including the potential loss of principal that clients should be prepared to bear.** It is impossible to name all possible types of risks. Among the risks are the following:

- **Political Risks.** Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences for markets around the world.
- **General Market Risks.** Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.
- **Currency Risk.** When investing in another country using another currency, the changes in the value of the currency can change the value of your security value in your portfolio.
- **Regulatory Risk.** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure, or laws impact the return on these investments.
- **Tax Risks Related to Short-Term Trading:** Clients should note that Abbington may engage in short-term trading transactions. These transactions may result in short-term gains or losses for federal and state tax purposes, which may be taxed at a higher rate than long-term strategies. Abbington endeavors to invest client assets in a tax-efficient manner, but all clients are advised to consult with their tax professionals regarding the transactions in client accounts.
- **Purchasing Power Risk.** Purchasing power risk is the risk that your investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does, which is the same thing. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- **Business Risk.** This can be thought of as certainty or uncertainty of income. Management comes under business risk. Cyclical companies (like automobile companies) have more business risk because of the less

steady income stream. On the other hand, fast food chains tend to have steadier income streams and therefore, less business risk.

- **Financial Risk.** The amount of debt or leverage determines the financial risk of a company.
- **Default Risk.** This risk pertains to the ability of a company to service its debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.
- **Margin Risk.** “Margin” is a tool used to maximize returns on a given investment by using securities in a client account as collateral for a loan from the custodian to the client. The proceeds of that loan are then used to buy more securities. In a positive result, the additional securities provide additional return on the same initial investment. In a negative result, the additional securities provide additional losses. Margin therefore carries a higher degree of risk than investing without margin. Any client account that will use margin will do so in accordance with Regulation T. Abbington may utilize margin on a limited basis for clients with higher risk tolerances.
- **Short Sales.** “Short sales” are a way to implement a trade in a security Abbington feels is overvalued. In a “long” trade, the investor is hoping the security increases in price. Thus, in a long trade, the amount of the investor’s loss (without margin) is the amount paid for the security. In a short sale, the investor is hoping the security decreases in price. However, unlike a long trade where the price of the security can only go from the purchase price to zero, in a short sale, the price of the security can go infinitely upwards. Thus, in a short sale, the potential for loss is unlimited and unknown, where the potential for loss in a long trade is limited and knowable. Abbington utilizes short sales only when the client’s risk tolerances permit.
- **Information Risk.** All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an adviser who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the adviser to reach satisfactory investment conclusions.
- **Small Companies.** Some investment opportunities in the marketplace involve smaller issuers. These companies may be starting up or are historically small. While these companies sometimes have potential for outsized returns, they also have the potential for losses because the reasons the company is small are also risks to the company’s future. For example, a company’s management may lack experience, or the company’s capital for growth may be restricted. These small companies also tend to trade less frequently than larger companies, which can add to the risks associated with their securities because the ability to sell them at an appropriate price may be limited as compared to the markets as a whole. Not only do these companies have investment risk, if a client is invested in such small companies and requests immediate or short-term liquidity, these securities may require a significant discount to value in order to be sold in a shorter time frame.
- **Concentration Risk.** While Abbington selects individual securities, including mutual funds, for client portfolios based on an individualized assessment of each security, this evaluation comes without an overlay of general economic or sector specific issue analysis. This means that a client’s equity portfolio may be concentrated in a specific sector, geography, or sub-sector (among other types of potential concentrations), so that if an unexpected event occurs that affects that specific sector or geography, for example, the client’s equity portfolio may be affected negatively, including significant losses.
- **Transition Risk.** As assets are transitioned from a client’s prior adviser(s) to Abbington there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the asset allocation

strategy selected by Abbington. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client's holdings into recommendations of Abbington may adversely affect the client's account values, as Abbington's recommendations may not be able to be fully implemented.

- **Restriction Risk.** Clients may at all times place reasonable restrictions on the management of their accounts. However, placing these restrictions may make managing the accounts more difficult, thus lowering the potential for returns.

- **Risks Related to Investment Term & Liquidity.** Securities do not follow a straight line up in value. All securities will have periods of time when the current price of the security is not an accurate measure of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had the investment had the opportunity to regain its value. Further, some investments are made with the intention of the investment appreciating over an extended period of time. Liquidating these investments prior to their intended time horizon may result in losses.

- **Excess Cash Balance Risk.** Client accounts may have cash balances in excess of \$250,000, which is the insurance limit of the Federal Deposit Insurance Corporation. For cash balances in excess of that amount, there is an enhanced risk that operation-related counterparty risk related to the account custodian could cause losses in the account. We mitigate this risk by carrying cash balances in amounts either subject to protection or as limited as you, the client, direct. You may elect to participate in a "cash sweep" program through your account custodian which automatically moves excess cash from your investment account into a cash account and then invests that cash into cash-based investments, such as money market funds. We do not receive compensation of any kind for facilitating your participation in such cash sweep accounts.

Item 9: Disciplinary Information

There are no disciplinary items to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Broker-dealer

Neither principals of Abbington, nor any related persons are registered or have an application pending to register, as a broker-dealer or as an associated person of the foregoing entities.

B. Futures Commission Merchant/Commodity Trading Advisor

Neither principals of Abbington, nor any related persons are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

C. Relationship with Related Persons

Neither principals nor any related persons have any material relationships to this advisory business that would present a possible conflict of interest.

D. Recommendations of Other Advisers

Abbington does not utilize nor select other advisers or third-party managers. All assets are managed by Abbington.

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

- A. A copy of our Code of Ethics is available upon request. Our Code of Ethics includes discussions of our fiduciary duty to clients, political contributions, gifts, entertainment, and trading guidelines.
- B. Not applicable. Abbington does not recommend to clients that they invest in any security in which Abbington or any principal thereof has any financial interest.
- C. On occasion, an employee of Abbington may purchase for his or her own account securities which are also recommended for clients. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades must be reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.
- D. On occasion, an employee of Abbington may purchase for his or her own account securities which are also recommended for clients at the same time the clients purchase the securities. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades must be reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

Item 12: Brokerage Practices

A. Recommendation of Broker-Dealer

Abbington recommends that investment accounts be held in custody by Fidelity Institutional Brokerage Group ("Fidelity") or Charles Schwab ("Schwab"). Fidelity and Schwab offer enhanced services to independent investment advisors. These services include custody of securities, trade execution platforms, and access to research not available to the general public. Fidelity and Schwab are wholly independent from Abbington. It is expected that most, if not all, transactions in a given client account will be cleared through the custodian of that account in its capacity as a broker-dealer.

Abbington recommends Fidelity or Schwab to its clients based on a variety of factors. These include, but are not limited to, commission costs. Fidelity and Schwab have what can be considered discounted

commission rates. However, in choosing a broker-dealer or custodian to recommend, we are most concerned with the value the client receives for the cost paid, not just the cost. Abbington does not receive or share in any of the commissions that Fidelity or Schwab charges. Fidelity and Schwab add value beyond commission cost. Other factors that may be considered in determining overall value include speed and accuracy of execution, financial strength, knowledge and experience of staff, research and service. Fidelity and Schwab also have arrangements with many mutual funds that enable us to purchase these mutual funds for client accounts at reduced transaction charges (as opposed to other broker-dealers). Abbington re-evaluates the use of Fidelity and Schwab at least annually to determine if they are still the best value for our clients.

Fidelity and Schwab provides us with some non-cash benefits (not available to retail customers) in return for placing client assets with them or executing trades through them. Such non-cash benefits are referred to as “soft dollars”. Currently, these benefits come in the form of investment research and sponsored attendance at various investment seminars. We may also receive such items as investment software, books and research reports. These products, services, or educational seminars are items that will play a role in determining how to invest client accounts. If there is any item that has a multi-use aspect, mixed between investment and non-investment purposes, Abbington will determine a reasonable allocation of investment to non-investment use and soft dollars will be allocated only to the investment portion of the product (and we will pay the remaining cost). Abbington receives a benefit from these services, as otherwise, we would be compiling the same research ourselves. This may cause us, or another adviser, to want to place more client accounts with a broker-dealer/custodian such as Fidelity or Schwab, solely because of these added benefits. However, the value to all of our clients of these benefits is included in our evaluation of custodians. Products and services received via soft dollars will generally be used for the benefit of all clients. However, it is possible that a given client’s trades will generate soft dollars that acquire products and/or services that are not ultimately utilized for that same client’s account. Soft dollars provide additional value and are accordingly considered in determining which broker-dealer or custodian to utilize as part of our best execution analysis.

We do not consider whether Fidelity, Schwab, or any other broker-dealer/custodian, refers clients to Abbington as part of our evaluation of these broker-dealers.

For assets managed directly by Abbington, Abbington will allow directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer.) In such client-directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Abbington will not seek better execution services or prices from other broker-dealers or be able to “batch” the client’s transactions for execution through other broker-dealers with orders for other accounts managed by Abbington. As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

B. Aggregating Trades

Commission costs per client may be lower on a particular trade if all clients whose accounts the trade is to be made are executed at the same time. This is called aggregating trades. Instead of placing a number of trades for the same security for each account, we will, when appropriate, execute one trade for all accounts and then allocate the trades to each account after execution. If an aggregate trade is not fully executed, the securities will be allocated to client accounts on a *pro-rata* basis, except where doing so would create an unintended adverse consequence (For example, if a *pro rata* division would result in a client receiving a fraction of a share or a position in the account of less than 1%.)

Item 13: Review of Accounts

All accounts will be reviewed by a senior professional on at least a quarterly basis. However, it is expected that market conditions, changes in a particular client's account, or changes to a client's circumstances will trigger a review of accounts.

The annual report in writing provided by Abbington is intended to review asset allocation. All clients will receive statements and confirmations of trades directly from Fidelity or Schwab. Additionally, all clients will receive monthly itemized bills from Abbington. Please refer to Item 15 regarding Custody.

Item 14: Client Referrals and Other Compensation

A. Economic Benefit Provided by Third Parties for Advice Rendered to Client.

Please refer to Item 12, where we discuss recommendation of Broker-Dealers.

B. Compensation to Non-Advisory Personnel for Client Referrals.

Abbington does compensate Price Value Partners 30% of the asset management fees received from clients referred to Abbington. This arrangement is governed by the marketing agreement between Abbington and Price Value Partners. The marketing name utilized by Abbington and Price Value Partners to refer clients to Abbington is Abbington Value Partners.

Item 15: Custody

Abbington deducts fees from client accounts but would not have custody of client funds otherwise. Clients will receive statements directly from Fidelity and Schwab, and copies of all trade confirmations directly from Fidelity and Schwab.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. The client will receive a statement from their account custodian showing all transactions in their account, including the fee.

We encourage clients to carefully review the statements and confirmations sent to them by their custodian, and to compare the information on your monthly report prepared by Abbington against the information in the statements provided directly from Fidelity and Schwab. Please alert us of any discrepancies.

Item 16: Investment Discretion

When Abbington is engaged to provide asset management services on a discretionary basis, we will monitor your accounts to ensure that they are meeting your asset allocation requirements. If any changes are needed to your investments, we will make the changes. These changes may involve selling a security or group of investments and buying others or keeping the proceeds in cash. You may at any time place restrictions on the types of investments we may use on your behalf, or on the allocations to each security type. You may

receive at your request written or electronic confirmations from your account custodian after any changes are made to your account. You will also receive monthly statements from your account custodian. Clients engaging us on a discretionary basis will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as an Investment Management Agreement that outlines the responsibilities of both the client and Abbington.

Item 17: Voting Client Securities

Copies of our Proxy Voting Policies are available upon request.

From time to time, shareholders of stocks, mutual funds, exchange traded funds or other securities may be permitted to vote on various types of corporate actions. Examples of these actions include mergers, tender offers, or board elections. Clients are required to vote proxies related to their investments, or to choose not to vote their proxies. Abbington will not accept authority to vote client securities. Clients will receive their proxies directly from the custodian for the client account. Abbington will not give clients advice on how to vote proxies.

Item 18: Financial Information

Abbington does not require the prepayment of fees more than six (6) months or more in advance and therefore has not provided a balance sheet with this brochure.

There are no material financial circumstances or conditions that would reasonably be expected to impair our ability to meet our contractual obligations to our clients.