

# VanderPol Investments LLC

## Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of VanderPol Investments LLC. If you have any questions about the contents of this brochure, please contact us at (616) 723-2637 or by email at: [mark.vanderpol@vanderpolinvestments.com](mailto:mark.vanderpol@vanderpolinvestments.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.*

*Additional information about VanderPol Investments LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). VanderPol Investments LLC's CRD number is: 168174.*

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*Registration does not imply a certain level of skill or training.*

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## **Item 2: Material Changes**

The material changes in this brochure from the last annual updating amendment of VanderPol Investments LLC on 03/25/2024 are described below. Material changes relate to VanderPol Investments LLC's policies, practices or conflicts of interests.

- VanderPol Investments LLC removed reference to Schwab Institutional Intelligent Portfolios. (Item 5)

## Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes.....	ii
Item 3: Table of Contents.....	iii
Item 4: Advisory Business.....	6
A. Description of the Advisory Firm.....	6
B. Types of Advisory Services.....	6
Portfolio Management .....	6
Model Portfolios .....	7
Financial Consulting Services .....	8
Pension Consulting Services .....	8
Participant Account Management (Discretionary) .....	8
Services Limited to Specific Types of Investments .....	9
C. Client Tailored Services and Client Imposed Restrictions .....	9
D. Wrap Fee Programs.....	9
E. Assets Under Management.....	9
Item 5: Fees and Compensation.....	9
A. Fee Schedule.....	9
Portfolio Management .....	9
Financial Consulting Services Fees .....	10
Pension Consulting Services Fees .....	10
Educational Seminars/Workshops .....	11
B. Payment of Fees.....	11
Payment of Portfolio Management .....	11
Payment of Financial Consulting Services Fees.....	11
Payment of Pension Consulting Services Fees.....	12
Payment of Educational Seminar/Workshop Fees .....	12
C. Clients Are Responsible For Third Party Fees .....	12
D. Prepayment of Fees .....	12
E. Outside Compensation For the Sale of Securities to Clients.....	12
Item 6: Performance-Based Fees and Side-By-Side Management .....	12
Item 7: Types of Clients .....	12
Minimum Account Size.....	13
Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss .....	13

A.	Methods of Analysis and Investment Strategies .....	13
	Methods of Analysis .....	13
	Fundamental analysis .....	13
	Cyclical analysis .....	13
	Investment Strategies .....	13
B.	Material Risks Involved .....	13
	Methods of Analysis .....	13
	Fundamental analysis .....	13
	Cyclical analysis .....	13
	Investment Strategies .....	13
C.	Risks of Specific Securities Utilized .....	14
	Item 9: Disciplinary Information .....	16
A.	Criminal or Civil Actions .....	16
B.	Administrative Proceedings .....	16
C.	Self-regulatory Organization (SRO) Proceedings .....	16
	Item 10: Other Financial Industry Activities and Affiliations .....	16
A.	Registration as a Broker/Dealer or Broker/Dealer Representative .....	16
B.	Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor .....	16
C.	Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests .....	16
D.	Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections .....	17
	Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	17
A.	Code of Ethics .....	17
B.	Recommendations Involving Material Financial Interests .....	17
C.	Investing Personal Money in the Same Securities as Clients .....	17
D.	Trading Securities At/ Around the Same Time as Clients' Securities .....	18
	Item 12: Brokerage Practices .....	18
A.	Factors Used to Select Custodians and/or Broker/Dealers .....	18
1.	Research and Other Soft-Dollar Benefits .....	18
2.	Brokerage for Client Referrals .....	20
3.	Clients Directing Which Broker/Dealer/Custodian to Use .....	20
B.	Aggregating (Block) Trading for Multiple Client Accounts .....	20
	Item 13: Reviews of Accounts .....	21
A.	Frequency and Nature of Periodic Reviews and Who Makes Those Reviews .....	21
B.	Factors That Will Trigger a Non-Periodic Review of Client Accounts .....	21
C.	Content and Frequency of Regular Reports Provided to Clients .....	21
	Item 14: Client Referrals and Other Compensation .....	21
A.	Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes) .....	21
B.	Compensation to Non – Advisory Personnel for Client Referrals .....	21

Item 15: Custody .....	21
Item 16: Investment Discretion .....	22
Item 17: Voting Client Securities (Proxy Voting).....	22
Item 18: Financial Information.....	22
A. Balance Sheet .....	22
B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients .....	23
C. Bankruptcy Petitions in Previous Ten Years .....	23
A. Material Relationships That Management Persons Have With Issuers of Securities (If Any) .....	23

## **Item 4: Advisory Business**

### **A. Description of the Advisory Firm**

VanderPol Investments LLC (hereinafter “VPI”) is a Limited Liability Company organized in the State of Michigan. The firm was formed in May 2013, and the principal owner is Mark A. VanderPol.

### **B. Types of Advisory Services**

VPI is a registered investment adviser in the state of Michigan. We provide investment advisory services to individuals, and high net worth individuals concerning various securities including equities, fixed income, and derivatives. As a registered investment adviser, we are held to the highest standard of client care - a fiduciary standard. As a fiduciary we always put our client's interests first and must fully disclose any potential conflict of interest. We do not directly hold customer funds or securities and all transactions are sent to our qualified custodian which executes, compares, allocates, clears, and settles them. Our custodian also maintains our clients' accounts and may grant clients access to them. We accept and enter trades on both a discretionary and a non-discretionary basis.

VPI offers the following services to advisory clients:

#### ***Portfolio Management***

VPI offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. This service may include financial planning, tax planning or other unrelated consulting for those clients that desire extra service. VPI creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). VPI can review all financial issues for our clientele, allowing for a balanced approach towards investments and risks in life. We will consider any additional insurance they may need, and the most appropriate investment strategy to achieve any and all of their goals.

Portfolio management services include, but are not limited to, the following:

- Customized Portfolio Management
- Automatic Rebalancing
- Periodic Reviews and Adjustments
- Access to a Broad Range of Investments
- Transparent Reporting and Communication
- Educational Resources and Support

For clients who maintain assets of more than \$250,000 in management with VPI will also receive:

- Tax Optimization Strategies
- Estate Planning
- Charitable Gift Planning
- Insurance Planning
- Tax Planning

VPI evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client. VPI seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of VPI's economic, investment or other financial interests. To meet its fiduciary obligations, VPI attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and, accordingly, VPI's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is VPI's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

### ***Model Portfolios***

VPI maintains twelve model portfolios that range from high risk to low risk that are implemented in a variety of ways depending on cost effectiveness, client tax situations, and successful execution of strategy. These portfolios may be made up of ETFs, mutual funds, individual stocks and or individual bonds. VPI emphasizes a Pastor-Stambaugh Model within each of these model portfolios that emphasizes small-capital weighted, value-oriented, illiquid equities relative to an appropriate benchmark. VPI considers the global equities benchmark of MSCI ACWI USD NR to be an appropriate measure of its equity's exposure and the Barclays US Aggregate Bond index an appropriate measure of its fixed income exposure and provides performance reports against these benchmarks to individual accounts based on the current percentage of equities held in the account rounded to the nearest ten percent and the remainder measured against the fixed income benchmark.

In our most basic models, VPI utilizes only low-cost ETFs that are highly diversified and are our favorite selection within their asset class. Going another step further, VPI may allocate those securities differently across Roth IRAs compared to traditional IRAs or taxable accounts in order to potentially generate higher after-tax returns. With more scale, VPI may find it more beneficial to incur a small custodial transaction fee for more precise implementation of the overall strategy and utilize mutual funds with large factor

tilts in conjunction with extremely low-cost index ETFs. When accounts are large enough for effective implementation, VPI may use a stratified sampling direct-indexing technique to provide optimal tax loss harvesting or donation options within the large cap US equities and or international equities allocations. Finally, VPI may utilize alternative investments (private equity funds, private real estate funds, private credit funds, hedge funds) to hopefully earn the illiquidity premium illustrated within the Pastor-Stambaugh model.

### ***Financial Consulting Services***

VPI provides financial consulting services to the Client on an hourly or retainer basis. Services shall include, but not be limited to, personal budgeting advice, evaluations of capital expenditure opportunities within their business, and other finance-related consulting services as requested by the Client. The exact nature of the services to be provided will be determined on a case-by-case basis, allowing for a broad interpretation of the financial consultancy remit.

### ***Pension Consulting Services***

VanderPol Investments offers ongoing consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans) based on the demographics, goals, objectives, time horizon, and/or risk tolerance of the plan's participants.

Pension consulting services may involve the direct investment management of one or more 401(k) participant accounts, provide the selection and monitoring process for the various mutual funds offered to plan participants, develop and maintain an Investment Policy Statement for the plan, and/or provide group and individual employee education on investment options, asset allocation, and retirement planning.

### ***Participant Account Management (Discretionary)***

VPI uses a third party platform, Pontera, to facilitate management of atypical accounts, such as current 401k's and other defined contribution plan participant accounts, with discretion. The platform allows VPI to avoid having custody of client funds since VPI does not have direct access to client log-in credentials to affect trades. VPI is not affiliated with the platform in any way and receives no compensation from them for using their platform. A link will be provided to the client allowing them to connect an account(s) to the platform. Once client account(s) is connected to the platform, VPI will review the current account allocations. When deemed necessary, VPI will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client account(s) will be reviewed at least quarterly, and allocation changes will be made as deemed necessary.



VPI may also provide its clients newsletters for no additional charge.

### ***Services Limited to Specific Types of Investments***

VPI generally limits its investment advice to mutual funds, equities, fixed income securities, ETFs (including ETFs in the gold and precious metal sectors), real estate funds (including REITs), non-U.S. securities, hedge funds, private equity funds, private credit funds, venture capital funds, and insurance products, including annuities.

### **C. Client Tailored Services and Client Imposed Restrictions**

VPI offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels), and cost efficient implementation for its clients. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent VPI from properly servicing the client account, or if the restrictions would require VPI to deviate from its standard suite of services, VPI reserves the right to end the relationship.

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

A wrap fee program is an investment program wherein the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. VPI does not participate in any wrap fee programs.

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

VPI has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 123,126,425	\$0.00	December 2023

## **Item 5: Fees and Compensation**

### **A. Fee Schedule**

#### ***Portfolio Management***

Total Assets Under Management	Annual Fee
Up to \$1,000,000	1.00%

Total Assets Under Management	Annual Fee
Next \$1,000,001	0.750%
Next \$8,000,000	0.625%
Additional Amounts	0.500%

These fees, which cover portfolio management and overall planning for client finances, are generally negotiable and the final fee schedule is attached as Exhibit II of the contract.

VPI uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

### ***Financial Consulting Services Fees***

The Client agrees to VPI the Service Provider a retainer fee at VPI, as specified in Exhibit A of the Hourly Consulting Agreement. Any services rendered beyond the retainer hours will be billed at an applicable hourly rate as shown on the table within Exhibit A in advance. The specifics of the retainer package, including the number of included hours and the hourly rate for additional services, will be outlined in Exhibit A. Exhibit A will also include a breakdown of each advisor's rates and expected monthly use for your desired services. The chart below includes the details of the retainer package, such as the number of hours included in the retainer fee, the hourly rate for additional services, and any other relevant information.)

	Mark VanderPol, CFP	Richard Toth, CFA, CAIA	Noah Hoekstra
Hourly Rate	\$250	\$175	\$100
Typical Services	Business Consulting, Capital Expenditures, Estate Communication	Valuations, Porter's Five Forces Report, Industry Outlooks	Budgeting, General Research

### ***Pension Consulting Services Fees***

VPI offers ongoing consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans).

<b>Total Assets Under Management</b>	<b>Annual Fee</b>
Up to \$1,000,000	1.00%
Next \$1,000,001	0.750%
Next \$8,000,000	0.625%
Additional Amounts	0.500%

These fees are negotiable depending upon the needs of the client and complexity of the situation. Fees are paid quarterly in advance. Refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. Clients may terminate the contract without penalty, for full refund of the adviser's fees, within five business days of signing the contract. Thereafter, client may terminate the contract with thirty days written notice.

### ***Educational Seminars/Workshops***

VPI provides periodic educational seminars and workshops to clients and the general public.

### ***Termination of Agreement***

Clients may terminate the agreement without penalty, for full refund of VPI's fees, within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with fifteen (15) days' written notice.

## **B. Payment of Fees**

### ***Payment of Portfolio Management***

The fees are withdrawn directly from the client's accounts with client's written authorization, or, in VPI's sole discretion, may instead be billed to the client. Fees are paid monthly. VPI may agree to other permissible methods of payment, in its sole discretion.

### ***Payment of Financial Consulting Services Fees***

VPI will invoice the Client monthly for the retainer fee and any additional hours worked beyond the scope of the retainer, as applicable. Payment is due immediately and will be charged to your account at the beginning of each month or is expected to be paid. Should billing fall below 50% of the retainer amount over a 12-month period a new estimate will be created alongside an amended exhibit A of the Hourly Consulting Agreement.

### ***Payment of Pension Consulting Services Fees***

Pension Consulting Fees are withdrawn directly from the client's accounts with client's written authorization or may be invoiced and billed directly to the client and clients may select the method in which they are billed.

### ***Payment of Educational Seminar/Workshop Fees***

Educational seminars and workshops are offered free of charge.

### **C. Clients Are Responsible For Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by VPI. Please see Item 12 of this brochure regarding broker/custodian.

### **D. Prepayment of Fees**

VPI collects its fees in arrears. It does not collect fees in advance.

### **E. Outside Compensation For the Sale of Securities to Clients**

Neither VPI nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

VPI does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **Item 7: Types of Clients**

VPI generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Corporations
- ❖

### ***Minimum Account Size***

\$250,000 is the minimum account size.

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

### **A. Methods of Analysis and Investment Strategies**

#### ***Methods of Analysis***

VPI's methods of analysis include fundamental analysis and cyclical analysis.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Cyclical analysis** involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

#### ***Investment Strategies***

VPI uses long term trading, short term trading, short-term purchases, short sales, margin transactions, and options trading (including covered options, uncovered options, or spreading strategies).

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **B. Material Risks Involved**

#### ***Methods of Analysis***

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Cyclical analysis** assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles these investors are trying to exploit.

#### ***Investment Strategies***

VPI's use of short term trading, short sales, margin transactions, and options trading generally holds greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Short term trading** risks include liquidity, economic stability and inflation, in addition to the long term trading risks listed above. Frequent trading, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

**Short sales** entail the possibility of infinite loss. An increase in the applicable securities' prices will result in a loss and, over time, the market has historically trended upward.

**Margin transactions** use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired.

**Options** writing or trading involves a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value and the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **C. Risks of Specific Securities Utilized**

VPI's use of short sales, margin transactions, and options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned below).

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry market conditions and general economic environments.

**Hedge Funds** often engage in leveraging and other speculative investment practices that may increase the risk of investment loss; can be highly illiquid; are not required to provide periodic pricing or valuation information to investors; May involve complex tax structures and delays in distributing important tax information; are not subject to the same regulatory requirements as mutual funds; and often charge high fees. In addition, hedge funds may invest in risky securities and engage in risky strategies.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary and include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile, and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). The price of Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) may be negatively impacted by several factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

**Real Estate** funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

**Options** are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or

expiration dates, which helps limit the risk of other option trading strategies. Option writing also involves risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

**Non-U.S. securities** present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither VPI nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither VPI nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Mark VanderPol is the owner of MVP Housing LLC, a limited partner at U.S. Signal, a large telecommunications provider.



Mark VanderPol is a licensed life and health insurance agent. The license is for advising purposes only and I don't receive compensation from the sale of insurance products. From time to time, he may offer clients advice from those activities but does not receive compensation from the sale of insurance products.

#### **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

VPI does not utilize nor select third-party investment advisers. All assets are managed by VPI management.

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

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

VPI has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

#### **B. Recommendations Involving Material Financial Interests**

VPI does not recommend that clients buy or sell any security in which a related person to VPI or VPI has a material financial interest.

#### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of VPI may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of VPI to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. VPI will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

## **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of VPI may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of VPI to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, VPI will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

Custodians/broker-dealers will be recommended based on VPI's duty to seek "best execution," which is the obligation to seek to execute securities transactions for a Client on terms that are the most favorable to the Client under the circumstances. The client will not necessarily pay the lowest commission or commission equivalent, and VPI may also consider the market expertise and research access provided by the payment of commissions, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers to aid in the research efforts of VPI. VPI will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian. Schwab Institutional, a division of Charles Schwab & Co., Inc., TIAA-CREF Individual & Institutional Services, LLC, and American Funds are recommended by VPI.

#### ***1. Research and Other Soft-Dollar Benefits***

While VPI has no formal soft dollars program in which soft dollars are used to pay for third party services, VPI may receive research, products, or other services from its broker/dealer in connection with client securities transactions ("soft dollar benefits") consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended, and may consider these benefits in recommending brokers. There can be no assurance that any particular client will benefit from any particular soft dollar research or other benefits. VPI benefits by not having to produce or pay for the research, products or services, and VPI will have an incentive to recommend a broker dealer based on receiving research or services. Clients should be aware that VPI's acceptance of soft dollar benefits may result in higher commissions charged to the client.

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. Through Schwab Advisor Services, CS&Co provides us and our clients, both those enrolled in the Program and our clients not enrolled in the Program, with access to its institutional brokerage services – trading, custody, reporting and related services – many of which are not typically

available to CS&Co retail customers. CS&Co 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. CS&Co's support services described below are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The availability to us of CS&Co's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients. Here is a more detailed description of CS&Co's support services:

CS&Co'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. CS&Co's services described in this paragraph generally benefit the client and the client's account.

CS&Co also makes available to us other products and services that benefit us but may not directly benefit the client or its account. 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 may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at CS&Co. In addition to investment research, CS&Co also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist with back-office functions, recordkeeping and client reporting.
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CS&Co also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

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

## **2. *Brokerage for Client Referrals***

VPI receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

## **3. *Clients Directing Which Broker/Dealer/Custodian to Use***

VPI may permit Clients to direct it to execute transactions through a specified broker-dealer. Clients must refer to their advisory agreements for a complete understanding of how they may be permitted to direct brokerage. If a client directs brokerage, the client will be required to acknowledge in writing that the Client's direction with respect to the use of brokers supersedes any authority granted to VPI to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; the client may be unable to participate in block trades (unless VPI is able to engage in "step outs"); and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

Client accounts enrolled in the Program are maintained at, and receive the brokerage services of, CS&Co., a broker-dealer registered with the Securities and Exchange Commission and a member of FINRA and SIPC. While clients are required to use CS&Co. as custodian/broker to enroll in the Program, the client decides whether to do so and opens its account with CS&Co. by entering into a brokerage account agreement directly with CS&Co. We do not open the account for the client. If the client does not wish to place his or her assets with CS&Co., then we cannot manage the client's account through the Program. CS&Co. may aggregate purchase and sale orders for ETFs across accounts enrolled in the Program, including both accounts for our clients and accounts for clients of other independent investment advisory firms using the Platform.

## **B. Aggregating (Block) Trading for Multiple Client Accounts**

If VPI buys or sells the same securities on behalf of more than one client, it might, but would be under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple Clients in order to seek more favorable prices, lower brokerage commissions or more efficient execution. In such case, VPI would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. VPI would determine the appropriate number of shares to place with brokers and will select the appropriate brokers consistent with the Adviser's duty to seek best execution, except for those accounts with specific brokerage direction (if any).

## **Item 13: Reviews of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

All client accounts are reviewed at least annually only by Mark A. VanderPol, President, with regard to clients' respective investment policies and risk tolerance levels. The client may be able to come in at any time and receive an updated investment plan.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Review may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client will receive at least annually a written report that details the client's account including assets held and asset value, which report will come from VPI.

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

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us. These products and services, how they benefit us, and the related conflicts of interest are described above under *Item 12 Brokerage Practices*. The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

### **B. Compensation to Non – Advisory Personnel for Client Referrals**

VPI may enter into written arrangements with third parties to act as solicitors for the Adviser's investment management services and any such arrangements will be fully disclosed. However, VPI currently does not have any such solicitor relationships in place.

## **Item 15: Custody**

VPI, with client written authority, has limited custody of client's assets through direct fee deduction of VPI's fees only. If the client chooses to be billed directly by Schwab or the client's

chosen custodian, VPI would have custody over that account and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

## **Item 16: Investment Discretion**

VPI provides discretionary and non-discretionary investment advisory services to clients. The Investment Advisory Contract established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, VPI generally manages the client's account and makes investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, the price per share. In some instances, VPI's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to VPI).

## **Item 17: Voting Client Securities (Proxy Voting)**

VPI acknowledges its fiduciary obligation to vote proxies on behalf of those clients that have delegated to it, or for which it is deemed to have, proxy voting authority. VPI will vote proxies on behalf of a client solely in the best interest of the relevant client. VPI has established general guidelines for voting proxies. VPI may also abstain from voting if, based on factors such as expense or difficulty of exercise, it determines that a client's interests are better served by abstaining. Further, because proxy proposals and individual company facts and circumstances may vary, VPI may vote in a manner that is contrary to the general guidelines if it believes that it would be in a client's best interest to do so. If a proxy proposal presents a conflict of interest between VPI and a client, then VPI will disclose the conflict of interest to the client prior to the proxy vote and, if participating in the vote, will vote in accordance with the client's wishes.

Clients are not required to have VPI vote proxies on their behalf and may vote Proxies themselves.

Clients may obtain a complete copy of the proxy voting policies and procedures by contacting VPI in writing and requesting such information. Each client may also request, by contacting VPI in writing, information concerning the manner in which proxy votes have been cast with respect to portfolio securities held by the relevant client during the prior annual period. Clients can send written requests to the Chief Compliance Officer at [Mark.Vanderpol@Vanderpolinvestments.com](mailto:Mark.Vanderpol@Vanderpolinvestments.com).

## **Item 18: Financial Information**

### **A. Balance Sheet**

VPI neither requires nor solicits prepayment of more than \$1200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

**B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

None.

**C. Bankruptcy Petitions in Previous Ten Years**

VPI has not been the subject of a bankruptcy petition in the last ten years.

**A. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

Neither VPI, nor its management persons, has any relationship or arrangement with issuers of securities.