

ITEM 1  
COVER PAGE

PART 2A OF FORM ADV: FIRM BROCHURE



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April 26, 2024

This brochure provides information about the qualifications and business practices of Dumont & Blake Investment Advisors, LLC., (together, with its relying adviser affiliates, the “**Adviser**,” “**we**,” “**us**,” or “**our**”). If you have any questions about the contents of this brochure, please contact us at 609-514-1899 or by email at: [info@dumontandblake.com](mailto:info@dumontandblake.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the “**SEC**”) or by any state securities authority.

Additional information about us also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

We are a registered investment adviser under the Investment Advisers Act of 1940, as amended (the “**Advisers Act**”). Our registration under the Advisers Act does not imply any level of skill or training.

ITEM 2  
MATERIAL CHANGES

Pursuant to SEC requirements and rules, you will receive a summary of any material changes to this brochure and subsequent brochures within 120 days of the close of our fiscal year.

In *Item 5B*, Fees and Compensation, the Firm has included an Adjustment Method when calculating fees during a billing period.

Our brochure may be requested, free of charge, by contacting us by telephone at: (609) 514-1899 or by email at: [info@dumontandblake.com](mailto:info@dumontandblake.com).

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## **ITEM 4**

### **ADVISORY BUSINESS**

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

Dumont & Blake Investment Advisors, LLC., (“DBIA”) is a limited liability company domiciled in New Jersey and was founded by its principal owner, Morley Goldberg in 1999.

DBIA is an independently owned registered investment advisor, managing investments primarily for individuals, pension and profit-sharing plans, trusts, and business entities, in accordance with the investment objective(s) of the client on a fee-only basis.

#### **B. Description of Advisory Services**

We manage equity, fixed income and balanced portfolios following a disciplined investment approach. Our investment team has extensive experience in the portfolio management and advisory business.

DBIA employs several investment strategies in managing client portfolios and uses a combination of these strategies to achieve the client’s goals and objectives. We discuss the risks and rewards of our various investment strategies with the client and discuss the asset allocation we propose to achieve the clients’ goals within their levels of risk tolerance.

#### **C. Availability of Customized Services for Individual Clients**

Working with DBIA you have direct access to the principals of the firm, real people who know you and your particular investment concerns. We have an important and unique relationship; you are not just an account number. Your portfolio and investment needs are treated with individual attention and care.

DBIA does not act as a custodian of client assets. Assets are always held at a custodian in the client’s name, and the client always maintains asset control. DBIA places trades for clients under a limited power of attorney.

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

DBIA sponsors a wrap fee program (the “Program”) with clients of The GMS Group, LLC., (“GMS”), an SEC registered broker-dealer, in accordance with the terms and conditions of the Program. In addition, DBIA charges a fee that may be more than our standard fee arrangement and shares a percentage of that fee with GMS.

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

As of December 31, 2023, DBIA manages approximately \$490,004,264 in assets. Approximately \$475,012,339 is managed on a discretionary basis, and \$14,991,925 is managed on a non-discretionary basis.

## **ITEM 5**

### **FEES AND COMPENSATION**

#### **A. Advisory Services and Fees**

DBIA bases its fees on a percentage of assets under management and fixed fees. Fees are negotiable.

DBIA charges an annual investment management fee based upon a percentage of the market value of the assets being managed by DBIA. The investment management fee charged shall vary as follows:

### Equity Accounts & Balanced Accounts

	Market Value of Portfolio	% of Assets
<b>First</b>	\$2,000,000	1.00%
<b>Next</b>	\$3,000,000	0.75%
<b>Over</b>	\$5,000,000	0.50%

### Fixed Income Accounts

	Market Value of Portfolio	% of Assets
<b>First</b>	\$ 500,000	0.60%
<b>Next</b>	\$ 500,000	0.50%
<b>Next</b>	\$2,000,000	0.45%
<b>Next</b>	\$2,000,000	0.40%
<b>Over</b>	\$5,000,000	0.30%

#### **B. Payment of Fees**

DBIA will generally require an account minimum of \$400,000.00 for asset management services. The annual investment management fee shall be pro-rated and paid quarterly, in advance, based upon the market value of the assets on the last day of the previous quarter. However, in its sole discretion, DBIA may accept a lesser account minimum or may charge a lesser management fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, etc.).

Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

#### **Adjustment Method**

For the initial period of an engagement, the fee is calculated on a pro rata basis. If assets are deposited into an account after the inception of a billing period, the fee payable with respect to such assets is adjusted and billed on a pro rata basis. In the event the advisory agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding or unearned portion of the fee is charged or refunded to the client, as appropriate.

#### **C. Additional Expenses and Fees**

### **OTHER FEES**

Charles Schwab and Fidelity Investments charges commission rates which are generally considered discounted from customary retail commission rates.

The commissions charged by Charles Schwab and Fidelity Investments may be higher or lower than those charged by other broker-dealers.

However, DBIA will not receive any portion of the brokerage commissions and/or transactions fees charged to the client.

The brokerage commissions and/or transaction fees charged by Charles Schwab and Fidelity Investments, or other designated broker-dealer/custodians are exclusive of, and in addition to, DBIA investment management fee.

Although the commissions paid by DBIA's clients shall comply with DBIA's duty to obtain "best execution," a client may pay a commission that is higher than another qualified broker-dealer might charge to affect the same transaction where DBIA determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received.

In seeking "best execution," the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of broker-dealer services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although DBIA will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions.

The brokerage commissions and/or transaction fees charged by Charles Schwab and Fidelity Investments or other designated broker-dealer/ custodian are exclusive of, and in addition to, DBIA's investment management fee.

In addition to management fees, a client may generally incur a fixed quarterly charge due to increased costs of account administration, maintenance of corporate records, including the cost and expense of internal systems and related personnel.

#### **BUYING SECURITIES AND OTHER INVESTMENTS ON MARGIN AND MARGIN INTEREST**

Margin involves borrowing money from the custodian to buy securities and other investments. If you use margin (subject to DBIA approval based on your stated investment objectives) to buy securities and other investments in your margin account, you will pay interest on the debit balances in your account. The rate varies depending on the size of the average debit balance. In addition, if your account is approved for margin, DBIA can create margin debt in your account as needed to pay monies owed by you, including the Fee and you will be responsible for the interest on any such margin debt.

Margin interest generates additional revenue to DBIA and your custodian. DBIA has a financial incentive to recommend its use. When margin is used to buy securities and other investments, the costs you incur, and the compensation received by DBIA generally increases as the size of the outstanding margin balance increases. Further, you pay more in advisory fees as the gross value of the account increases. There is no incentive for DBIA to recommend the liquidation of any asset to pay down a margin debit.

Margin borrowing involves additional risks. Margin borrowing results in increased gains if the value of the securities and other investments in the account go up, but increased losses if the value of the securities in the account goes down. The custodian has the authority to liquidate all or part of the account to repay any portion of the margin loan, even if the timing would be disadvantageous to you. Upon approval, where applicable, you receive a Truth In Lending Statement from the custodian disclosing the risks, including an explanation of the details and conditions under which interest is charged, the method of computing interest, and the conditions under which additional collateral may be required. For more information, please refer to our Margin Account Risk Disclosure Document.

#### **EXPENSE RATIOS**

If DBIA uses Mutual funds to manage client portfolios we will use only no-load funds or funds that have no sales charge. Mutual funds generally charge a management fee for their services as investment managers and include a charge for other fund expenses. The total expenses are generally referred to as an expense ratio. For example, an expense ratio of 50 basis points (bp) means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to DBIA. DBIA does not receive any fees from mutual funds. Performance figures quoted by mutual fund companies in various publications are after their expenses have been deducted.

## **TERMINATION OF AGREEMENT**

A client may terminate our agreement at any time by giving us written notice. Any unused portion of the fee will be refunded on pro-rata basis.

### **ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

Fees are not based on a share of the capital gains or capital appreciation of managed securities. DBIA does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

### **ITEM 7 TYPES OF CLIENTS**

DBIA generally provides investment advice to individuals, pension and profit-sharing plans, individual retirement plans, trusts, and business entities, in accordance with the investment objective(s) of the client. Client relationships vary in scope and length of service.

### **ACCOUNT MINIMUMS**

The minimum account size is \$400,000 of assets under management. DBIA has the discretion to waive the account minimum. Accounts of less than \$400,000 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total to \$400,000 within a reasonable time. Other exceptions will apply to employees of DBIA and their relatives, or relatives of existing clients.

Clients with assets below the minimum account size may pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management.

### **ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

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

#### **METHODS OF ANALYSIS**

Security analysis methods include fundamental, valuation, and technical analysis.

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

Other sources of information that DBIA may use include government reports, consultations with industry experts, employment of outside consultants and continual consultation with the management of various mutual funds.

#### **INVESTMENT STRATEGIES**

DBIA employs several investment strategies to manage client portfolios. Through its investment advisory services, DBIA offers the following portfolio strategies:

#### **CORE EQUITY STRATEGY**



Our core equity strategy is based on the Multi-Discipline Approach (“MDA”). DBIA has developed and employs the Multi-Discipline Approach to manage client portfolios.

The approach is designed to provide consistent, above-average investment returns, with equal or less risk and volatility than the S&P 500.

There are three major investment disciplines employed by portfolio managers to manage portfolios. Each discipline allows the manager to select stocks based on certain criteria. These disciplines are sometimes referred to as investment styles. They are 1) Growth, 2) Value, and 3) Growth at a Reasonable Price (GARP).

The Growth manager looks for companies that have a good long-term growth of sales and earnings in addition to strong earnings momentum in the short-term. Generally, these are popular well-known companies, and are very rarely priced cheaply.

The Value manager looks for companies that are out of favor and have been beaten down to attractive or cheap prices. Value companies are generally companies that have had a decent long-term record but are experiencing short-term problems which have caused earnings to decline. The Value manager has to assess whether the decline is temporary or the beginning of a major decline or stagnation of earnings.

The Growth at a Reasonable Price (GARP) manager looks for companies that have above average earnings and sales growth but lower than the companies sought out by the Growth manager. Unlike the Growth manager the GARP manager is price sensitive. The GARP manager employs the combined analysis and valuation tools of the Growth and Value managers.

The MDA is based on the concept that in order to outperform the S&P 500 benchmark on a consistent basis you must have a properly diversified portfolio. Just as total portfolio performance is based on the appropriate asset allocation between stocks, bonds, and cash, equity performance is determined by appropriately allocating the stock selection between economic sectors. Further diversification between industry groups within each sector, and stock selection within each industry group, contribute to outperforming the standard benchmark.

Our core equity discipline diversifies the portfolio into eleven economic sectors with weightings close to the weighting of these sectors in our benchmark, the S&P 500. Basically, the portfolio is sector neutral to the S&P 500. We choose our individual stocks within each sector using our relative valuation model. The model determines a fair value, cheap value and an expensive value for any stock relative to the present S&P 500 valuation. From many companies within each sector we select those companies that are selling at fair value or below fair value to do further research. Theoretically, a stock selling below relative fair value has a positive risk/reward ratio or a higher probability of outperforming the S&P 500. Based upon our research and the relative valuations we construct a portfolio that is sector neutral and comprised of stocks that have a positive risk/reward ratio. Our core equity discipline is designed to outperform the benchmark with lower volatility because, based on the structure, the portfolio has a positive risk/reward ratio.

### **EXCHANGE TRADED FUNDS (“ETF”) STRATEGY**

An Exchange Traded Fund (ETF) is a basket of common stocks designed to replicate a particular index, segment, or sector of the market. The performance and risk of each ETF closely matches the performance and risk of the particular index, segment, or sector being replicated. It has been customary to mix and match different mutual funds to obtain a diversified equity portfolio but with the evolving of ETF's it has become more efficient and cost-effective to use ETF's instead of mutual funds.

DBIA has developed a diversified portfolio comprised of ETF's with the objectives of consistent returns with low risk and volatility. There are four parts to the portfolio: market indexes, market segments, economic sectors, and international indexes. Areas to invest and changes within those areas are based on our fundamental and market analysis, and the output of our price momentum model, which helps us make decisions on when to buy and sell a particular ETF.

DBIA believes our ETF portfolio will produce consistent risk adjusted returns. The portfolio will be more tax efficient and cost effective than a portfolio of mutual funds. While we are taking some additional risk in the segment and sector parts to increase the performance of the portfolio the risk is measured and controllable.

## **ENHANCED INCOME OPTION STRATEGY (“EIOS”)**

The EIOS strategy is designed to complement a core equity strategy by providing excellent returns in a flat to low return stock market. It is also used to increase income in a diversified equity portfolio strategy.

The strategy involves selling put and call options on individual stocks and market indexes. A call option gives the buyer the right to buy the underlying stock or index at a given price (strike price) for a given period of time (expiration date). Once it expires it is worthless. The buyer pays what is called a premium for this option. The seller gets the premium in exchange for allowing the buyer to buy or sell the stock to him at the agreed upon price (strike price).

Since the majority of put and call options are never exercised the seller ends up keeping the premiums and the underlying stock or index on which the option is sold. In other words, option sellers generally do better than option buyers. The EIOS strategy is a seller of options not a buyer of options.

The EIOS strategy writes options on individual stocks and market indexes. We sell put and call options and collect premiums for both. At expiration one or both of these options are worthless. The portfolio diversifies the options by both maturity date and strike price.

The portfolio will have 20% to 25% invested in 6 to 10 stocks with both puts and calls written against each position. The remaining portfolio will be invested in market indexes, primarily SPY's (S&P 500 Index) and DIA's (Dow Jones Ind. Avg.) with both puts and calls written against them.

## **DIVIDEND STRATEGY**

The Dumont & Blake Dividend Strategy Portfolio invests primarily in dividend-paying stocks that offer the potential for income growth and capital appreciation over time. DBIA believes companies that raise their dividends consistently each year and maintain strong balance sheets are attractive investments for the long-term investor.

We invest in small, mid, and large capitalization companies, and use broad sector diversification in order to reduce the risk of the portfolio. We screen for stocks that exhibit some or all of the following criteria: have raised dividends consistently over a long time period, are trading at the low end of their earnings valuation versus the market, are undervalued based on a conservative discounted cash flow model, have solid balance sheets, and are showing positive analyst earnings estimate revisions. We maintain a portfolio of 65-75 stocks and initially equally weight each position and rebalance periodically.

## **MID-CAP QUANT STRATEGY**

The Dumont & Blake Mid-Cap Quant Portfolio invests primarily in mid-capitalization stocks. DBIA believes that certain quantitative factors can predict stock movements, and that the mid-cap market offers mis-pricings allowing us to capitalize on those discrepancies. We begin with the 400 stocks in the MDY, the SPDR Mid-Cap ETF. We rank those stocks based on a number of factors, including but not limited to: valuation, fundamental growth, cash flow, analyst revisions and surprises, technical and sentiment factors. We buy the top ranked 50-55 stocks, maintaining broad sector diversification. If a stock's ranking drops below a certain threshold, we sell and replace it with the next best stock on our list. We rebalance periodically throughout the year, and occasionally reconstitute the portfolio.

## **TACTICAL STRATEGY**

The Tactical Investment Strategy is designed to maximize upside capture and minimize downside capture depending on market conditions. The investment selection process entails diversification by equities, fixed income, mutual funds and ETF's. The allocation is based on market trends, overall market conditions, and the client's goals and objectives, at the discretion of the advisor. The strategy uses both fundamental and technical analysis.

### **B. Risk of Loss**

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

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate.

For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Margin Risk:** Margin borrowing involves additional risks. Margin borrowing results in increased gains if the value of the securities and other investments in the account go up, but increased losses if the value of the securities in the account goes down. The custodian has the authority to liquidate all or part of the account to repay any portion of the margin loan, even if the timing would be disadvantageous to you. Upon approval, where applicable, you receive a Truth In Lending Statement from us disclosing the risks, including an explanation of the details and conditions under which interest is charged, the method of computing interest, and the conditions under which additional collateral may be required.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Shorter term investment strategies** require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer-term investment strategy.

### **C. Recommendation of a Particular Type of Security**

There are no material limitations to the types of securities in which we may invest our Clients (subject to anything to the contrary in the relevant advisory agreement, offering document, or organizational documents of a particular Client).

## **ITEM 9 DISCIPLINARY INFORMATION**

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

**ITEM 10**  
**OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

**A. Broker-Dealer Registration**

DBIA and its employees do not have any relationships or arrangements with other financial services companies that pose material conflicts of interest.

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

DBIA and its employees do not have any relationships or arrangements with other financial services companies that pose material conflicts of interest.

**C. Material Relationships and Conflicts of Interests with Industry Participants**

DBIA has arrangements that are material to its advisory or its clients with a related person who is an insurance agent. In this regard, DBIA's principal, Morley Goldberg is a licensed insurance agent, and in such capacity may introduce clients to insurance agencies, if insurance is part of the client's financial plan, and/or to obtain certain insurance-related products. Accordingly, DBIA does not exercise any discretionary authority with respect to a client's decision to obtain such insurance-related products but may receive fees in connection therewith.

**D. Material Conflicts of Interest Relating to Other Investment Advisers**

DBIA and its employees do not have any relationships or arrangements with other financial services companies that pose material conflicts of interest.

**ITEM 11**  
**CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

**A. Code of Ethics**

The employees of DBIA have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

**B. Recommending, Buying, or Selling Securities in which We or a Related Person Have a Material Financial Interest, Invest, or Buy or Sell at the Same Time; Conflict of Interests**

**PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS**

DBIA and its employees may buy or sell securities that are also held by clients. Employees may trade along with clients in the same trade. Generally, employees may not trade their own securities ahead of client trades if that trade would negatively impact the price of the stock purchased for a client. Because the stocks we trade are highly liquid the compliance officer will determine if an employee trade would have any impact on the price paid or received by a client. Employees comply with the provisions of the DBIA's Compliance Manual.

**PERSONAL TRADING**

The Chief Compliance Officer of DBIA is Morley Goldberg. He pre-approves all employee trades and has designated a qualified supervisor to pre-approve trades in his absence. The Chief Compliance Officer's trades are reviewed by other supervisory personnel. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that employees of the firm do not receive preferential treatment.

## **ITEM 12 BROKERAGE PRACTICES**

### **A. Selection of Broker-Dealers and Reasonableness of Compensation**

DBIA does not have any affiliation with product sales firms. Specific custodian recommendations are made to clients based on their need for such services. DBIA recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

DBIA recommends discount brokerage firms and trust companies (qualified custodians), such as Charles Schwab, and Fidelity Investments. Clients may choose any broker-dealer to custody their assets, but DBIA has no control over the commissions charged.

The client has to negotiate the commission rate at that custodian. DBIA does not receive fees or commissions from any of these arrangements.

It should be noted that for those accounts held at Charles Schwab, commission rates for equities and ETFs are \$0 per trade and option trades are charged \$0.65 per contract. Enrollment in electronic delivery and household account value do not apply.

It should be noted that for those accounts held at Fidelity Investments, commission rates for equities and ETFs are charged \$0 per trade up to 10,000 shares, trades for 10,000 shares and over are charged 0.01/share and option trades are charged \$0.65 per contract for accounts enrolled in electronic delivery of statements and confirms regardless of household account value. The rate for household accounts under \$1 million and not enrolled in electronic delivery are charged \$4.95 per trade up to 10,000 shares, for trades 10,000 shares or more are charged 0.01/share.

## **BEST EXECUTION**

DBIA reviews the execution of trades at each custodian each quarter. The review is documented in the annual compliance review performed by LSCG, Inc. Trading fees charged by the custodians is also reviewed on a quarterly basis. DBIA does not receive any portion of the trading fees.

### **A. Aggregating Orders for Various Client Accounts**

When executing a trade in various accounts we aggregate the trade by purchasing the security during the day and averaging the price paid. Each client pays the average price.

### **B. Trade Errors**

Trade and other clerical errors resulting in gains will be for the benefit of the client and will not be retained by DBIA. DBIA is under no obligation, however, to reimburse the client for trade and other clerical errors made by DBIA, its agents and affiliates, as such errors are considered by DBIA to be a cost of doing business.

Notwithstanding the foregoing, DBIA will be obligated to reimburse the client for any trade or other clerical error resulting from the DBIA's willful misconduct, gross negligence, or material breach under the exculpation of liability and indemnification provisions of the Investment Management Agreements maintained with the client. DBIA, subject to its fiduciary obligations, will determine whether or not any trade or other clerical error is required to be reimbursed in accordance with such liability and exculpation provisions. DBIA, in its sole discretion, reserves the right to reimburse the client for any trade or other clerical error. DBIA's reimbursement of the client for any particular error will not constitute a waiver of any policy to cause the client to bear the losses from other trade or other clerical errors.

## **ITEM 13 REVIEW OF ACCOUNTS**

### **A. Periodic Review of Client Accounts**

Account reviews are performed quarterly by Morley Goldberg, President. Account reviews are performed more frequently when market conditions dictate.

### **B. Additional Review of Client Accounts**

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation. Performance variation from the norm will also trigger a portfolio review.

Account reviewers are members of the firm's Investment Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

### **C. Contents and Frequency of Account Reports to Clients**

Clients receive periodic communications on at least a quarterly basis. Investment Management clients can receive written reports upon request. Portfolio performance and asset allocation are reviewed at individual client meetings and conferences.

## **ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION**

### **A. Economic Benefits for Providing Services to Clients**

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

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

### **B. Compensation to Non-Supervised Persons for Client Referrals**

DBIA renders services for clients of The GMS Group, LLC ("GMS"), an SEC registered broker-dealer, in accordance with the terms and conditions of a wrap fee program (the "Program") sponsored by DBIA exclusively to serve the investment management needs of GMS' clients. All wrap program participants shall receive a copy of both the Registrant's written disclosure statement and a copy of DBIA's wrap fee brochure which discusses the terms and conditions for participation in the Program.

All GMS clients that are referred by GMS to DBIA for participation in the Program should read both the DBIA's disclosure statement and the wrap fee brochure prior to becoming a Program participant. GMS shall serve as the broker-dealer for all Program securities transactions.

Each Program participant understands and acknowledges that in the event that the transactions for a client's account(s) are effected through a broker-dealer that refers investment management clients to the Registrant, there exists the potential for conflict of interest if the account(s) incur higher commission or transaction costs than the account(s) would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through DBIA. GMS shall also serve as the solicitor for the Program.

Specifically, DBIA formed the Program for the exclusive purpose of servicing the investment management needs of GMS' brokerage clients. In addition to serving as the Program broker-dealer, GMS also serves as the Program solicitor, pursuant to which GMS shall receive a portion of the Program Fee for each of its clients that choose to participate in the Program.

GMS shall apply the referral fee as a credit to all brokerage fees due under the Program such that the maximum total annual compensation to be received by GMS under the Program (referral fee plus brokerage) with respect to any referred client shall not exceed the amount of the referral fee.

## **ITEM 15 CUSTODY**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

With respect to SEC Rule 206(4)-2, DBIA is deemed to have custody of client's funds when an employee of DBIA serves as a trustee and/or co-trustee for an advisory account. Pursuant to SEC Rule 206(4)-2, DBIA is required to have a qualified Public Company Accounting Oversight Board Member ("PCAOB") to conduct annual surprise examination audits for those accounts. This will ensure the allowance of an independent third-party review of DBIA's records and other procedures in conformity with the amendments to SEC Rule 206(4)-2 under the Investment Advisers Act of 1940.

It should be noted that DBIA is deemed to have custody only for those accounts where a DBIA employee acts as a trustee/co-trustee. The PCAOB is conducting the audit only on those accounts.

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

## **ITEM 16 INVESTMENT DISCRETION**

### **DISCRETIONARY AUTHORITY FOR TRADING**

DBIA accepts discretionary authority to manage securities accounts on behalf of clients. DBIA 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.

However, DBIA consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

The client approves the custodian to be used and the commission rates paid to the custodian. DBIA does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

### **LIMITED POWER OF ATTORNEY**

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

## **ITEM 17 VOTING CLIENT SECURITIES**

We have accepted, and in the future will continue to accept, the authority to vote our clients' securities. As such, we have adopted policies and corresponding procedures to comply with Rule 206(4)-6 promulgated under the Advisers Act and with our fiduciary obligations (the "**Proxy Voting Policies**"). The Proxy Voting Policy applies to voting securities held by our Clients and has been designed to ensure that we vote proxies in the best interest of our Clients.

For most matters, our policy is not to vote a proxy if we believe the proposal is not adverse to the best interest of the Funds or, if adverse, the outcome of the vote is not in doubt in order to avoid the unnecessary expenditure of time and the cost to review the proxy materials in detail and carry out the vote. In the situations where we do vote a proxy, our primary objective is to make decisions in the best interest of our Clients. In fulfilling our obligations to our Clients, we will act in a manner deemed to be prudent and diligent to enhance the economic value of the underlying securities held by each of our Clients.

In acting upon these matters on behalf of our Clients, we will seek to avoid material conflicts of interest between our interests and the interests of our Clients.

A member of our senior management will be responsible for making voting decisions with regard to all of our clients' proxies. When voting proxies, or determining not to vote, some, but not all, of our considerations include:

- the view and opinion of management of the portfolio companies in which our Client holds a position and the effect of management's position on the value of our Client's investment;
- with regard to corporate governance matters, the purpose underlying the Client's investment position, including the investment horizon and the current or planned ownership position and degree of our involvement, on behalf of our Client, in management;
- with regard to proposals related to stock option plans and other management compensation issues, the portfolio company's need to recruit and retain highly qualified individuals in competitive labor markets and the relevant industry standards and practices;
- the purpose of proposed changes to the capital structure of a portfolio company and the likely effect of the change on the Client's investment; and
- with regard to proposals related to social and corporate responsibility, we will generally defer to company management, but will not support any proposals that may conflict with the portfolio company's ability to maximize long-term profits or may have an adverse effect on our client's investment.

When deciding whether and how to vote proxies, certain conflicts of interest may arise. For example, portfolio companies in which different Clients are invested may be competing for or involved in similar transactions, investments, lines of business, or types of research. Voting a proxy with regard to one Client's portfolio company may adversely affect the prospects or business of another Client's portfolio company. Because we serve as investment advisers to several Clients, a proxy vote in one manner may benefit one Client and a proxy vote in the same manner would adversely affect other Clients. In acting upon these matters on behalf of our Clients, we will seek to avoid material conflicts between our interests on the one hand and the interests of our Clients on the other. In addition, each Client's organizational documents may include provisions for the identification and mitigation of conflicts of interest.

If a Client has authorized us to vote proxies on its behalf, we will generally not accept instructions from the Client regarding how to vote on a particular proxy or solicitation. We will maintain proper records in connection with our Proxy Voting Policies, as required under the Advisers Act. Our Clients can obtain a copy of our Proxy Voting Policy and how we voted their securities from us at (609) 514-1899 or by email at: [info@dumontandblake.com](mailto:info@dumontandblake.com).

## **ITEM 18**

### **FINANCIAL INFORMATION**

#### **A. Balance Sheet**

A balance sheet is not required to be provided because DBIA does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.



**B. Contractual Commitments to Our Clients**

DBIA does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

**C. Bankruptcy Petitions**

DBIA has never filed for bankruptcy and is not aware of any financial condition that is expected to affect its ability to manage client accounts.