

Item 1 Cover Page



NOBLE FAMILY WEALTH

VISION • DISCIPLINE • LEGACY

Noble Family Wealth
2475 Enterprise Rd.
Clearwater, FL 33763

www.NobleFamilyWealth.com

March 7, 2024

This brochure provides information about the qualifications and business practices of Noble Family Wealth. If you have any questions about the contents of this brochure, please contact us at (727) 674-1462. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration as a registered investment advisor does not imply a certain level of skill or training.

Additional information about Noble Family Wealth also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

Noble Family Wealth has not made any changes to this Brochure since the date of its last annual amendment. The date of the last annual amendment of the Brochure was March 9, 2023.

Item 3 Table of Contents

Brochure

Item 1 Cover Page	1
Item 2 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 and Side-by-Side Management	5
Item 7 Types of Clients	5
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss	6
Item 9 Disciplinary Information.....	9
Item 10 Other Financial Industry Activities and Affiliations.....	9
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	10
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	14
Item 17 Voting Client Securities	14
Item 18 Financial Information.....	14

Item 4 Advisory Business

Noble Family Wealth is an investment advisor firm registered with the U.S. Securities and Exchange Commission (“SEC”).

The principal owner of Noble Family Wealth is Sandra Nesbit, CEO/Managing Partner.

Advisory Services

Noble Family Wealth’s (“NFW” or “Advisor”) principal service is providing fee-based investment advisory services and comprehensive financial planning services.

Investment Supervisory Services

The Advisor practices custom management of portfolios, on a discretionary basis, according to the client’s objectives. The Advisor’s primary approach is to use a tactical allocation strategy aimed at reducing risk and increasing performance. The Advisor does not limit the types of securities it advises on. The Advisor measures and selects mutual funds by using various criteria, such as the fund manager’s tenure, and/or overall career performance. The Advisor may recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The Advisor may recommend specific stocks to increase sector weighting and/or dividend potential. The Advisor may recommend employing cash positions as a possible hedge against market movement which may adversely affect the portfolio. The Advisor may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client’s risk tolerance.

Comprehensive Financial Planning Services

In addition to investment supervisory services, NFW provides comprehensive financial planning services to some of its clients at its discretion. The Advisor’s financial planning services may include recommendations for portfolio customization based on the client’s investment objectives, goals and financial situation, recommendations relating to investment strategies as well as tailored investment advice. Financial planning may also include non-investment advice such as developing strategies to achieve retirement or other financial goals, tax optimization strategies, cash flow and budgeting analysis and recommendations, financing and financial education, estate planning, and asset protection strategies. NFW does not charge a separate fee for providing the comprehensive financial planning services. Financial plans once prepared and delivered are not reviewed unless the client requests an update.

NFW will tailor its advisory services to its client’s individual needs based on meetings and conversations with the client. If clients wish to impose certain restrictions on investing in certain securities or types of securities, the Advisor will address those restrictions with the client to have a clear understanding of the client’s requirements.

NFW does not provide portfolio management services to wrap fee programs.

As of December 31, 2023, NFW had \$362,627,821 million in discretionary and no non-discretionary client assets under management.

Item 5 Fees and Compensation

Asset Management Fees

Pursuant to an Investment Advisory Agreement signed by each client, the client will pay NFW an annual management fee of up to 1.0%, payable monthly in advance, based on the value of portfolio assets of the account managed by the Advisor as of the opening of business on the first business day of each month. New account fees shall commence on the first business day of the first full month after signing the advisory agreement. These fees may be negotiated by NFW at its sole discretion for several reasons, including size of a client's account, a pre-existing client relationship, and account retention. NFW can also choose to cover or reimburse custodian administrative charges (e.g., overnight, wire, and statement charges, etc.) based on these factors as well. These practices create a conflict of interest in that some clients are charged more than other clients. The client will give written authorization permitting the Advisor to be paid directly from their account held by the custodian. The custodian will send a statement at least quarterly to the client and the amount withdrawn from the client account. Where it is not practical to deduct fees directly from client accounts, client will be sent an invoice at the beginning of each month. The invoice is payable upon receipt.

The comprehensive financial planning services described in Item 4 are included in the annual management fee described above. NFW does not charge separately for the financial planning services.

All fees paid to NFW for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange traded funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee and other fund expenses.

The client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Advisor's fee is separate and distinct from the custodian and execution fees.

NFW's management fee is payable in advance. Upon termination, any fees paid in advance will be prorated to the date of termination and any unearned fees will be refunded to client.

Neither NFW nor its supervised persons accept 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

NFW does not charge performance-based fees.

Item 7 Types of Clients

The Advisor will offer its services to individuals, trusts, estates, and charitable organizations. We generally impose a minimum aggregated value of \$2 million per client relationship but may waive this requirement for smaller accounts at our discretion.

When NFW provides investment advice to a client regarding their retirement plan or individual retirement account, NFW is a fiduciary within the meaning of Title I of ERISA and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way NFW makes money creates some conflicts with a retirement client's interests, so NFW operates under a special rule that requires NFW to act in a retirement client's best interest and not put NFW's interest ahead of them. Under this regulation's provisions, NFW must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Not put NFW's financial interests ahead of a retirement client's when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that NFW gives advice that is in a retirement client's best interest;
- Charge no more than is reasonable for NFW's services; and
- Give a retirement client basic information about conflicts of interest.

NFW has an economic incentive to encourage a client to rollover a retirement plan or IRA into an IRA NFW manages. This arrangement creates a conflict of interest in that it creates an incentive for NFW to recommend that a client rollover their account for advisory services rather than retaining it with an unaffiliated third party.

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

NFW manages portfolios based on multi-asset class diversification across equities, fixed-income, and alternative assets. The specific allocation is tailored to the objectives of each individual portfolio considering return requirement, risk tolerance, time-horizon, liquidity needs, and taxes.

Allocation decisions are based on the tendency for asset classes to revert to long-term performance over time with an understanding that the diversions from long-term performance can be meaningful in scale and duration. NFW analyzes long-term and short-term performance of each asset classes both on an absolute and relative basis. In addition, NFW uses sentiment indicators such as fund-flow data to assist in allocation and timing decisions.

NFW primarily utilizes exchange-traded funds (ETFs) to fulfill each portfolio allocation, although where appropriate other investment vehicles may be used. Individual ETFs are selected based on one or more of the following characteristics: tracking error to the desired benchmark, liquidity, expense ratio, and length of history.

The investment strategies the Advisor will implement may include: long term purchases of securities held at least for one year; short term purchases for securities sold within a year; trading of securities sold within 30 days; short sales; margin transactions; and option writing, including covered options, uncovered options, or spreading strategies.

The methods of analysis and investment strategies followed by the Advisor are utilized across all of the Advisors clients, as applicable. One method of analysis or investment strategy is not more significant than the other as the Advisor is considering the client's portfolio, risk tolerance, time horizon and individual goals. However, the client should be aware that with any trading that occurs in the client account, the client will incur applicable transaction and administrative costs.

Investing includes the risk that the value of an investment can be negatively affected by factors specifically related to the investment (e.g., capability of management, competition, new inventions by other companies, lawsuits against the company, labor issues, patent expiration, etc.), or to factors related to investing and the markets in general (e.g., the economy, wars, civil unrest or terrorism around the world, concern about oil prices or unemployment, etc.).

All investments involve some degree of risk. In finance, risk refers to the degree of uncertainty and/or potential financial loss inherent in an investment decision. In general, as investment risks rise, investors seek higher returns to compensate themselves for taking such risks. Clients need to be aware that investing in securities involves risk of loss that clients need to be prepared to bear.

Every saving and investment product has different risks and returns. Differences include how readily investors can get their money when they need it, how fast their money will grow, and how safe their money will be. The primary risks faced by investors include:

Business Risk

With a stock, you are purchasing a piece of ownership in a company. With a bond, you are loaning money to a company. Returns from both of these investments require that the company stays in business. If a company goes bankrupt and its assets are liquidated, common stockholders are the last in line to share in the proceeds. If there are assets, the company's bondholders will be paid first, then holders of preferred stock. If you are a common stockholder, you get whatever is left, which may be nothing.

Volatility Risk

Even when companies aren't in danger of failing, their stock price may fluctuate up or down. Large company stocks as a group, for example, have lost money on average about one out of every three years. A stock's price can be affected by factors inside the company, such as a faulty product, or by events the company has no control over, such as political or market events.

Inflation Risk

Inflation is a general upward movement of prices. Inflation reduces purchasing power, which is a risk for investors receiving a fixed rate of interest. The principal concern for individuals investing in cash equivalents is that inflation will erode returns.

Interest Rate Risk

Interest rate changes can affect a bond's value. If bonds are held to maturity the investor will receive the face value, plus interest. If sold before maturity, the bond may be worth more or less than the face value. Rising interest rates will make newly issued bonds more appealing to investors because the newer bonds will have a higher rate of interest than older ones. To sell an older bond with a lower interest rate, you might have to sell it at a discount.

Liquidity Risk

This refers to the risk that investors won't find a market for their securities, potentially preventing them from buying or selling when they want. This can be the case with the more complicated investment products. It may also be the case with products that charge a penalty for early withdrawal or liquidation such as a certificate of deposit (CD).

The Advisor does primarily recommend portfolio construction using ETFs. However, clients are advised that many unexpected broad environmental factors can negatively impact the value of portfolio securities causing the loss of some or all of the investment, including changes in interest rates, political events, natural disasters, and acts of war or terrorism. Further, factors relevant to specific securities may have negative effects on their value, such as competition or government regulation. Also, the factors for which the company was selected for inclusion in a client portfolio may change, for example, due to changes in management, new product introductions, or lawsuits.

Mutual Fund and ETF Risks:

Every type of investment, including mutual funds and ETFs, involves risk. Risk refers to the possibility that you will lose money (both principal and any earnings) or fail to make money on an investment. A fund's investment objective and its holdings are influential factors in determining how risky a fund is. Reading the prospectus will help you to understand the risk associated with that particular fund.

Pledged Assets Risks:

Pledging securities to secure a loan involves the risk that the lender has the authority to liquidate all or part of the securities at any time without giving the client prior notice in order to maintain required maintenance levels, or to call a loan at any time. The cost of loan interest can affect an accounts overall performance.

Margin Risks:

Margin transactions are generally effected using capital borrowed from a broker-dealer, which is secured by a client's securities holdings ("collateral") in the broker-dealer's account. A broker-dealer can demand an increase in the underlying collateral. If the client is unable to provide the additional collateral, the broker-dealer can liquidate account securities to satisfy the client's outstanding obligations, which could have extremely adverse consequences. In addition, fluctuations in the amount of a client's borrowings and the corresponding interest rates can have a significant effect on the profitability and stability of the client's portfolio.

Options Risks:

Trading options is speculative in nature and involves a high degree of risk. Purchasing options involves the risk that the underlying security will not change price in the manner expected so the investor loses their premium. Options investing involves risks such as liquidity, interest rate, market, credit and the risk that a position could not be closed timely. The purchase or sale of an option involves the payment or receipt of a premium by the investor and the corresponding right or obligation to either purchase or sell the underlying security for a specific price at a certain time or during a certain period. Selling options involves the possibility of greater risk because the investor is exposed to the extent of the actual price movement in the underlying security rather than only the premium payment received, which could result in a potentially unlimited loss.

Short Sale Risks:

A short sale involves selling a borrowed security for a specified time with the expectation that the price of the security will decrease at which time the security can be purchased back to return to the lender. Short sales are considered a risky trading strategy because gains are limited to the difference in price the security was borrowed at from the price it is repurchase if the security's value decreases, while the loss can be unlimited if the at security increases in price.

Generally speaking, risk and potential return are related. This is the risk/return trade-off. Higher risks are usually taken with the expectation of higher returns at the cost of increased volatility. While an investment with higher risk has the potential for higher return, it also has the greater potential for losses or negative returns. The school of thought when investing in mutual funds and ETFs suggests that the longer your investment time horizon is the less affected you should be by short-term volatility. Therefore, the shorter your investment time horizon, the more concerned you should be with short-term volatility and higher risk.

Below is a list of some of the other risks to consider when investing:

- **Call Risk.** The possibility that falling interest rates will cause a bond issuer to redeem—or call—its high-yielding bond before the bond's maturity date.
- **Country Risk.** The possibility that political events (a war, national elections), financial problems (rising inflation, government default), or natural disasters (an earthquake, a poor harvest) will weaken a country's economy and cause investments in that country to decline.
- **Credit Risk.** The possibility that a bond issuer will fail to repay interest and principal in a timely manner. Also called default risk.
- **Currency Risk.** The possibility that returns could be reduced for Americans investing in foreign securities because of a rise in the value of the U.S. dollar against foreign currencies. Also called exchange-rate risk.
- **Income Risk.** The possibility that a fixed-income fund's dividends will decline as a result of falling overall interest rates.
- **Industry Risk.** The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.
- **Manager Risk.** The possibility that an actively managed mutual fund's investment adviser will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.
- **Market Risk.** The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- **Principal Risk.** The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

Item 9 Disciplinary Information

Neither NFW nor its management persons have had any legal or disciplinary events, currently or in the past.

Item 10 Other Financial Industry Activities and Affiliations

Neither NFW nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

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

NFW does not currently have any relationships or arrangements that are material to its advisory business or clients with either a broker-dealer, municipal securities dealer, or government securities dealer or broker, investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund” and offshore fund), other investment advisor or financial planner, futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer or sponsor of syndicator of limited partnerships.

NFW does not recommend or select other investment advisers for clients.

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

NFW is registered with the SEC and maintains a Code of Ethics pursuant to SEC Rule 204A-1. NFW has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser. In addition, the Code of Ethics governs personal trading by each employee of NFW deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of NFW are conducted in a manner that avoids any conflict of interest between such persons and clients of the adviser or its affiliates. NFW collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. NFW will provide a copy of the Code of Ethics to any client or prospective client upon request.

NFW does not recommend to clients, or buy or sell for client accounts, securities in which the firm or a related person has a material financial interest.

NFW and/or its Investment Advisor Representatives may from time to time purchase or sell products that they may recommend to clients. This practice creates conflicts of interest in that personnel of NFW can take advantage of the advance knowledge of firm securities trading and trade their personal accounts ahead of the client trades or recommend trades in client accounts that may affect the price of the securities owned by the Investment Advisor Representatives. To mitigate these conflicts, NFW has adopted a Code of Ethics as noted above. NFW’s Code of Ethics is available upon request. Finally, supervised persons of registered investment advisors are fiduciaries by law and are required to put the client’s interest before those of the firm and themselves.

NFW requires that its investment advisor representatives follow its basic policies and ethical standards as set forth in its Code of Ethics.

Investment Advisor Representatives of NFW can trade for their own accounts securities that are being traded for client accounts at or about the same time. To mitigate the conflict of interest in such circumstances, NFW’s policy is to require the trading of all relevant client accounts prior to the trading of their own accounts. The Chief Compliance Officer examines personal trading activities of NFW’s personnel to verify compliance with this policy.

Item 12 Brokerage Practices

NFW recommends that all clients use a particular broker-dealer for execution and/or custodial services. The broker-dealer NFW bases its recommendation on criteria such as, but not limited to, reasonableness of commissions charged to the client, tools and services made available to the client and NFW, and convenience of access to the account trading and reporting. The client will provide authority to NFW to direct all transactions through that broker-dealer in the investment advisory agreement.

NFW recommends that clients establish brokerage accounts with Pershing LLC (“Pershing”) to maintain custody of clients’ assets and to effect trades for their accounts. There is no direct link between NFW’s recommendation of Pershing and the investment advice it gives to its clients, although NFW receives economic benefits through its participation in the program. These benefits include the following products and services (provided without cost or at a discount):

- receipt of duplicate client statements and confirmations;
- research related products and tools;
- consulting services;
- access to a trading desk serving the Advisor;
- access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts);
- the ability to have advisory fees deducted directly from client accounts; and
- access to an electronic communications network for client order entry and account information.

Some of the products and services Pershing makes available benefit NFW but may not benefit its client accounts. These products or services assist NFW in managing and administering client accounts, including accounts not maintained at Pershing. Other services Pershing makes available are intended to help NFW manage and further develop its business enterprise. The benefits NFW or its personnel receives do not depend on the amount of brokerage transactions directed to Pershing. As part of its fiduciary duties to clients, NFW endeavors at all times to put the interests of its clients first. Clients should be aware, however, that NFW’s receipt of economic benefits in and of itself creates a potential conflict of interest and can indirectly influence NFW’s choice of Pershing for custody and brokerage services over another custodian.

NFW may receive proprietary research services or other products as a result of recommending Pershing, which may result in the client paying higher commissions than those obtainable through other broker-dealers. If NFW does receive such products or services, it will follow procedures which ensure compliance with Section 28(e) of the Securities Exchange Act of 1934 or applicable state securities rules.

NFW seeks to obtain the most favorable net results for clients’ price, execution quality, services and commissions. Although NFW seeks competitive commission rates, clients may pay commissions that are higher than those available from other broker-dealers in order to receive other services. NFW may enter into such transactions so long as it determines in good faith that the amount of commission paid was reasonable in relation to the value of the brokerage and research services Pershing provided. The services that NFW may consider in this determination of reasonableness may include: (1) advice, either directly or through publications or writing, as to the value of securities, the advisability of investing in, purchasing or selling securities, and the availability of

securities or purchasers or sellers of securities; (2) analysis and reports concerning issuers, industries, securities, economic factors and trends, portfolio strategy, and the performance of accounts; or (3) effecting securities transactions and performing functions incidental thereto. In particular, third-party research provided by broker-dealers may be used to benefit all of NFW's clients. This creates a conflict of interest in that NFW has an incentive to select or recommend a broker-dealer based on its interest in receiving the research or other products or services, rather than on the clients' interest in receiving most favorable execution. Benefits received may be used as soft dollars provided that:

- The service is primarily for the benefit of NFW's clients;
- The commission rates are competitive with rates charged by comparable broker-dealers; and
- NFW does not guarantee a minimum amount of commissions to any broker-dealer.

NFW does not receive client referrals from any broker-dealer or third party as a result of the firm selecting or recommending that broker-dealer to clients.

As an investment advisory firm, NFW has a fiduciary duty to seek best execution for client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question. Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client. NFW's primary objectives when placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. NFW may not necessarily pay the lowest commission or commission equivalent as specific transactions may involve specialized services on the part of the broker.

NFW does not permit clients to direct brokerage.

NFW may combine orders into block trades when more than one account is participating in the trade. This blocking or bunching technique must be equitable and potentially advantageous for each such account (e.g., for the purposes of reducing brokerage commissions or obtaining a more favorable execution price). Block trading is performed when it is consistent with the duty to seek best execution and is consistent with the terms of NFW's investment advisory agreements. Equity trades are blocked based upon fairness to client, both in the participation of their account, and in the allocation of orders for the accounts of more than one client. Allocations of all orders are performed in a timely and efficient manner. All managed accounts participating in a block execution receive the same execution price (average share price) for the securities purchased or sold in a trading day. Any portion of an order that remains unfilled at the end of a given day will be rewritten on the following day as a new order with a new daily average price to be determined at the end of the following day. Due to the low liquidity of certain securities, broker availability may be limited. Open orders are worked until they are completely filled, which may span the course of several days. If an order is filled in its entirety, securities purchased in the aggregated transaction will be allocated among the accounts participating in the trade in accordance with the allocation statement. If an order is partially filled, the securities will be allocated pro rata based on the allocation statement. NFW may allocate trades in a different manner than indicated on the

allocation statement (non-pro rata) only if all managed accounts receive fair and equitable treatment.

Item 13 Review of Accounts

The firm reviews client accounts on an annual basis, or when conditions would warrant a review based on market conditions or changes in client circumstances. Triggering factors include NFW becoming aware of a change in client's investment objective, a change in market conditions, change of employment, or a change in recommended asset allocation weightings in the account that exceed a predefined guideline. Client accounts (and/or financial plans) are reviewed by Brian D. Glas, Family Wealth Advisor and Partner.

The client is encouraged to notify NFW and their Investment Advisor Representative if changes occur in his/her personal financial situation that might materially affect his/her investment plan.

The client will receive written statements no less than quarterly from the custodian. In addition, the client will receive other supporting reports from mutual funds, asset managers, trust companies or other custodians, broker-dealers and others who are involved with client accounts. NFW does not deliver separate client reports.

Item 14 Client Referrals and Other Compensation

NFW is not compensated by anyone for providing investment advice or other advisory services except as previously disclosed in this Brochure.

NFW does not directly or indirectly compensate any person who is not a supervised person for client referrals.

Item 15 Custody

NFW is considered to have custody of client funds or securities due to the ability to withdraw advisory fees directly from client accounts (please see Item 5 which describes the safeguards around direct fee deduction). However, as noted in Item 13 above, clients will receive statements not less than quarterly from the qualified custodian, and we encourage you to review those statements carefully. Any discrepancies should be immediately brought to the firm's attention.

NFW has custody when clients authorize it, via standing letters of instruction, to direct funds to third-parties from their custodial accounts. In connection with standing letters of instruction, a client must provide signed written instruction to the custodian to direct transfers to a third party. The client may instruct the custodian to terminate or change a standing letter of instruction at any time. NFW has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction. The custodian will verify the instruction with an initial notice to the client, provide the client with a transfer of funds notice promptly after each transfer, and an annual notice reconfirming the instruction. NFW and our employees may not accept funds in connection with standing letters of instruction, nor may funds be delivered to locations where NFW conducts business.

Item 16 Investment Discretion

NFW generally has discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client for each transaction. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by NFW.

Discretionary authority will only be provided upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by NFW will be in accordance with each client's investment objectives and goals.

Item 17 Voting Client Securities

NFW will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. Also, NFW cannot give any advice or take any action with respect to the voting of these proxies. The client and NFW agree to this by contract. Clients will receive proxy solicitations from their custodian and/or transfer agent.

Item 18 Financial Information

NFW does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, and is not required to file a balance sheet.

NFW has discretionary authority over client accounts and is not aware of any financial condition that will likely impair its ability to meet contractual commitments to clients. If NFW does become aware of any such financial condition, this brochure will be updated and clients will be notified.

NFW has never been subject to a bankruptcy petition.