

**BROCHURE FOR STOCK MANAGEMENT LLC**

**CRD# 113902**

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**WEBSITES: WWW.BENHEEB.COM & WWW.STOCKMANAGEMENTLLC.COM**

**DATED: March 26, 2024**

This brochure provides information about the qualifications and business practices of Stock Management LLC.

If you have any questions about the contents of this brochure, please contact us at 253-535-5530 (Puyallup Office), 360-669-0538 (Centralia Office) or [Invest@BenHeeb.com](mailto:Invest@BenHeeb.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 Stock Management LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## **Item 2) Material Changes**

Annual Update: 2024-03-21 Removed Michael Calta

Material Changes since the Last Update:.

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#### **Item 4) Advisory Business.**

The principal owners of the Stock Management LLC are Ben Heeb and Susan Williams and more information about them is listed in the brochure supplement. Stock Management LLC has been in business since 1984 dba Ben Heeb and Assoc. The primary service we provide is investment supervisory service. You may always ask questions and you can give direction to us. Our major concern is we provide appropriate investments for you, your families and businesses within the goals we set together. We do not participate in wrap fee programs or use load mutual funds. As of March 2024 we manage \$116 Million in client assets on a discretionary basis.

Stock Management LLC provides the investment advisory services for a percentage of assets under management and do not charge on a commission basis. We determine a set of goals, in discussion with you, based on your circumstances and when you expect to need to use your investments. Those goals will include your cash requirements, as you know them and share with us. These discussions will yield portfolio targets for stocks, fixed income and money market funds. Those ratios being set, we will select the stocks, bonds, ETFs and no-load mutual funds that will appropriately approach your goals, as previously agreed. Sell targets for the stocks will be initially set by the Investment Advisor. The client may request or direct modifications to the sell target or to order the sale of a stock or to change the goals previously set. There are a few other ways a stock's sell target is set. If the stock goes up 60%, it is sold. If the stock goes down 40% or if the stock's financial strength is downgraded by Value Line to C+ or worse, it is sold. A sale may also be made because of a fundamental change in the company's circumstances. The investor may request the sale of a stock. These standards are subject to change at the discretion of the Advisor.

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#### **Item 5) Fees and Compensation.**

You may choose to pay by direct billing or deduction by the custodian from your account or by direct billing. Fees are not negotiable. Fees may be waived or decreased for employees and non-profit organizations at the discretion of the company. Fees are billed quarterly, in arrears, based on the account value as of the last day of the quarter. Bonds are not assessed fees and so are not included in the billable assets for the purpose of fees. Only half of the mutual fund total is considered as billable assets for the purpose of fees. In all instances, the Adviser will send the client a written invoice, including the fee, the formula used to calculate the fee, the fee calculation itself, the time period covered by the fee, and, if applicable, the amount of assets under management on which the fee was based and the name of the custodian(s) on your fee invoice. The Adviser will send these to the client concurrent with the request for payment or payment of the Adviser's advisory fees. We urge the client to compare this information with the fees listed in the account statement."

The fee schedule is:

<b>Billable Assets</b>	<b>Quarterly Fee</b>
Portion over \$1,000,001 .....	0.0625%
Portion between \$100,001 and \$1,000,000 .....	0.125%
Portion between \$50,001 and \$100,000 .....	0.250%
Portion between \$15,001 and \$50,000 .....	0.500%
Portion below \$15,000 .....	0.625%

For example: A \$500,000 account of 50% bonds, 40% stocks, and 10% mutual funds at the end of a quarter might have \$250,000 in bonds, \$200,000 in stocks and \$50,000 in mutual funds. The billable assets would be \$225,000 consisting of zero in bonds, \$25,000 (half of the mutual funds) plus \$200,000 in stocks. Fees are based on the billable assets (\$225,000), not the \$500,000 total assets.

For this example, the fee would be \$550. The calculation would be: \$93.75 (first \$15000 x .00625); plus \$175 (next \$35,000 x .0050); plus \$125 (next \$50,000 x .0025); plus \$156.25 (next \$125,000 x .00125).

The quarterly fee rate for this example is the \$550 divided by the \$500,000 which is 0.11%. Multiplying the quarterly fee by 4 would give an annual rate for fees of 0.44% in the example.

**Custodians/broker will charge commission, transaction fees, NSF Check Fees, Wire Transfer Fees, ADR Fees on foreign stocks, Non-standard asset fees, outgoing transfer fees, statement mailing fees, and other maintenance fees. Mutual Fund Expense Ratios are disclosed immediately upon purchase by the broker. Stock Management LLC receives no part of the broker's fees or commissions. Load mutual funds (A shares, B shares, C shares) are never recommended by us, and we never collect sales charges or incentives. The lowest OER class for which the client qualifies is normally recommended. Each brokerage has its own standards, trade pricing policies, breakpoints and thresholds, annual fees, etc. These are discussed before the account is opened at that brokerage to assist the client in choosing their custodian. Lower fees for comparable services may be available from other sources. Sincere efforts are made to minimize costs and keep fees and services comparable or better.**

Monthly balance sheets contain the formula for how billable assets are calculated and the fee table and the quarterly fee rate for the account. We generally have small accounts mainly in mutual funds and small accounts should never contain all individual stocks. If they did, the 0.625% quarterly fee, and corresponding 2.5% annual rate would be too expensive. In practice since only half of the mutual fund assets are included in billable assets, small accounts actually are managed for a lesser annual rate than that. At the top of each balance sheet, three performance figures are calculated: A return of the portfolio since inception (or long term), a year-to-date ratio, and the most recent quarterly return. If there have been no deposits or withdrawals in the period, the current value is simply subtracted from the closing value at the end of the last period and that result divided by the closing value at the end of last period. When deposits or withdrawals occur during the period, appropriate pro-rated adjustments are made so that the timing of the transfers is not a factor in the performance figures. Performance returns are net of fees since fees are deducted before performance is calculated. Dividends and interest are included since they are part of the performance of the portfolio. Clients will incur brokerage and mutual fund expenses in addition to our fees. We never recommend load mutual funds unless the loads are waived. Each time a fee is directly deducted from your client's account, you will concurrently send your client an invoice itemizing the fee. For all clients, including direct fee billing to clients, you will be provided written billing information containing the fee(s), the formula used to calculate the fee(s), and the time period covered by the fee(s) written on each monthly or quarterly statement.

The client has the right to terminate the contract without penalty within five business days after entering into the contract. Services may also be terminated at any time by either party by giving written notification. Stock Management LLC shall immediately discontinue all trading (but may settle open transactions and execute additional trades upon instruction from client). After receiving a termination request, Stock Management LLC will calculate a final bill for the pro-rated portion of the quarter for which management was provided.

### Research and Other Soft Dollar Benefits.

Stock Management LLC does have an arrangement where it receives some economic benefit from a non-client in connection with giving advice to clients which is known as "soft money". Charles Schwab & Co provides "Schwab Institutional" internet access codes as account management tools. Fidelity Investments currently provides "Wealthscape" internet access codes as an account management tool. There is no cost to the company or any client for these services. These programs are necessary to effectively manage accounts, view positions,

place trades electronically, enroll new accounts, obtain sales materials, and communicate more effectively with the brokerage firm.

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**Item 6) Performance-Based Fees and Side-by Side Management.**

We think this would be a conflict of interest and we do not use this type of management.

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**Item 7) Types of Clients.**

We provide investment advisory services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, and corporations.

There are no requirements for opening or maintaining an account, such as minimum account size or number of transactions.

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**Item 8a) Methods of analysis.**

We use fundamental analysis to pick stocks to your goals. We mainly buy stocks with data from Value Line. We tend to think data from other sources may have a bias. We do listen to the news and read the Wall Street Journal, Barron's, Fortune, Money Magazine and such, but we are skeptical of this information. Our first screening of a potential stock is the company's financial strength. We screen out a company if it does not have at least a B+ financial strength. We are bargain hunters by instinct. We want to buy the most growth at a reasonable price. We use the Value Line survey data to do a comparative analysis of all of the stocks, that have proper financial strength, to give us a current list (candidate list) sorted in order of the growth versus price. Dividends are considered in this analysis, of course, as applicable.

If a stock's financial strength is decreased to C+ or lower we generally sell off all of our positions.

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**Item 8b) Investment Strategies.**

We invest mainly in exchange-listed securities, mutual funds, ETFs and in corporate bonds and CDs. If appropriate, we will buy municipal bonds and government bonds. We will help you with your existing variable annuities and may help buy fixed annuities, in the rare case that they are appropriate. We try to keep costs down and have an incentive to do so.

We set goals with clients for a balance of stocks and fixed income taking liquidity needs into consideration. We believe in diversification within the portfolios. We use the candidate list (described above) to buy stocks for the portfolios. We use no-load, no-transaction fee mutual funds to invest both the stock and fixed income portions of the portfolios.

We buy the stocks with the intent of holding for at least a year, but will sell earlier if our sell targets are met. We very seldom use margin, and typically at a client's request.

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**Item 8c) Risk of Loss.**

Material Risk - Investing in securities and bonds involves risk of loss that clients should be prepared to bear. As discussed above, our discussions will yield targets for a balance of stocks, fixed income and money market funds. No matter how well chosen, many stocks will go down when the market goes down. Since we are

usually not in stocks only, the entire portfolio should not lose as much as the stocks alone. Bonds go down when interest rates go up or the quality of the company decreases. We mitigate this by having mainly bonds that mature and have the intent to hold to maturity. This is called a bond ladder and it reduces interest rate risk. If the portfolio is too small for individual bonds, we use bond funds. Money Market Funds are not FDIC insured and pay very small interest. We keep these levels small and in line with the next few months liquidity needs. The market fluctuates, up and down. We review the portfolio's goals at least monthly and reinvest if the goals are out of balance significantly. This means that we harvest gains when we have them and have the money to invest when there are losses.

Although all investments involve risk, including the potential loss of principal, some securities (such as equities) involve more risk than other securities (treasury bonds). Higher-risk investments have the potential for higher returns, but also for greater losses. It is noted that, if the percentage of equities is too low there is a risk that the portfolio will not meet its growth goal. Maintaining a balanced portfolio is one way we mitigate risk.

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**Item 9) Disciplinary Information.**

On 1/11/2022, Susan Williams was charged by the State of Washington Department of Financial Institutions Securities Division with violating WAC-460-24A-220(26) by accessing a client's account using that client's own unique identifying information. This was resolved by a no-contest plea and resulted in a thirty-day suspension from acting as an investment adviser representative that was completed on 2/13/2022. There were no client complaints or evidence of client loss.

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**Item 10) Other Financial Industry Activities and Affiliations.**

We don't have any other financial industry activities and affiliations.

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

The company has established a code of ethics. The underlying fact is that we have a fiduciary responsibility to the client to do our actions in a way that is favorable to the client. A client or prospective client may request a copy of the code of ethics by contacting the contact persons on page 1 or emailing us at [Invest@BenHeeb.com](mailto:Invest@BenHeeb.com). We only trade publicly-traded listed securities. Rarely, we assist with client-initiated privately held items. We do not create or offer any securities for sale.

Employees of the firm do buy the same publicly-traded listed securities that we buy for clients. We prohibit buying for ourselves before buying for clients. That would be "front running" and is a conflict of interest. Our trade reports list any employee transactions with a highlighted color so they are easily identifiable and reviewable. Employees do not place their own trades and each transaction is reviewed by a principal of the firm. An employee transaction can be included with a block trade and all accounts within the block trade receive equal average cost. Good-til-cancel sale orders are entered with the same criteria as clients, at the same time, and the broker, with no bias for or against the employee, controls the execution details. Should a client request a security previously traded that day by an employee, a contemporaneous note is made and the client is notified.

Stock Management LLC and all employees/representatives do not have any material conflicts of interest which could be reasonably expected to impair the rendering of unbiased and objective advice that does not promote "fair, equitable or ethical principles".

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## **Item 12) Brokerage Practices.**

Stock Management LLC does not require a client to direct us to execute transactions through a specific broker-dealer. Not all advisors require their clients to direct a brokerage. By directing a brokerage you may be unable to achieve the most favorable execution of transactions, and this practice may cost clients more money. Stock Management LLC does not have the authority to determine the broker to be used or the commission rates paid. The broker selection is established at the time the account is opened and funded. Clients may specify the broker to be used, but are advised that a discount broker is recommended, such as Schwab, Fidelity or Scottrade, which allow appropriate management of client accounts and have reasonable fees. No broker is paid extra in recognition of the value of services provided, unless the client has requested a more expensive brokerage agreement. In such a case, no portion would go to our company.

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

We do not receive referrals from Brokers. This would be a potential conflict of interest because it would give an incentive to not pick a broker based on the clients' interests.

### **Directed Brokerage.**

We pick listed securities, funds, and bonds. We buy them all in the brokerage firm selected by the client when they fund the account. If we bought securities of any kind at a different brokerage fund than where the account is located, the client might have to pay higher brokerage commissions, we may not be able to aggregate orders to reduce transaction cost, or the client may receive less favorable prices. Additionally, there could be costs related to paying for the securities and transferring them to the account. We often aggregate orders when we buy or sell the same stocks at the same time at the same brokerage firm. This will generally reduce transaction costs and each client is not front running another client, resulting in fairness to all.

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## **Item 13) Review of Accounts.**

We review each account at least monthly and whenever a position is sold or when a deposit or withdrawal is made. The Nature of this review is to rebalance back to investment goals and to make sure that investment goals are still applicable to the clients' situation. This review leads to a rebalancing when appropriate. The Principals of the firm make this review. We offer monthly statements to clients of these accounts. These statements are sent by the method requested by the client. Statements include performance since inception, year to date performance and quarterly performance, along with all held securities and positions sold the current year. Statement also includes a suitability review and investment balance goals.

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## **Item 14) Client Referrals and Other Compensation.**

We appreciate all referrals but we do not compensate persons for them.

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**Item 15) Custody.**

206(4)-2 under the Investment Advisers Act of 1940 states an adviser has custody if it holds, directly or indirectly, client funds or securities, or has any authority to obtain possession of them. The amendments to the rule revised the definition of "custody" under the rule to specifically include in the definition of custody arrangements where an adviser's related person has custody of client assets in connection with advisory services the adviser provides to clients. For example, if an affiliated broker-dealer of an investment adviser maintains custody of client assets as qualified custodian in connection with advisory services the investment adviser would have custody of those client assets.

Stock Management LLC does not maintain custody of any client assets, securities or funds, except that fees are deducted from the accounts. The Broker that does have custody sends each client a monthly or quarterly account statement. Stock Management does not accept cash or credit card transactions. Checks directly payable to the broker or client-established bank links or client-signed standing authorizations do not leave the custody of the client or the broker. Management fee deductions are previously authorized by most clients and an invoice is given and calculated and billed in arrears. The final ruling on 206(4)-2(a)(3) effective 12 Mar 2010 page 5 states that advisers have custody solely because of their authority to deduct advisory fees from client accounts. Therefore, technical custody does apply. Clients should carefully review the statements of the broker or custodian. Since you also receive an account statement from us, we urge you to compare the account statements. It is your best defense to make sure that they match up in all material ways. Many frauds occur when there are not two statements to reconcile against each other.

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**Item 16) Investment Discretion.**

We manage security accounts on behalf of clients who have provided us with discretionary authority in their brokerage applications and confirm it on their contracts with us. We exercise that discretion within the constraints of the asset allocation goals. Clients may provide us a list of stocks to avoid. Brokerage Account applications and Stock Management LLCs advisor contract provide trading, disbursement and fee payment authorization.

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**Item 17) Voting Client Securities.**

Clients choose whether to retain authority to vote their own securities on their account application. Clients may receive their proxies or other solicitations directly. Clients can contact us with questions if they wish. Clients can change whether to have us vote proxies at any time. Proxies are internally reviewed and judged by the Investment Advisory team. A client can inquire at any time on what current and recent proxies applied to assets in their account and the way it was voted. It is our desire to always vote proxies in the best interest of our clients and provide clients with information about how their proxies are voted as requested.

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**Item 18) Financial Information.**

We do not require or solicit prepayment of fees. We have not been the subject of a bankruptcy petition in our history. No financial condition currently exist that would be likely to impair Stock Management LLCs ability to meet contractual commitments to clients.



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**Item 19) Requirements for State-Registered Advisers.**

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- A. Ben Heeb and Susan M Williams are the principal executive officers and management. See Supplement for education and business background.
- B. Stock Management LLC and its representatives have no outside business activity.
- C. No performance-based fees are assessed.
- D.
  - 1. Stock Management LLC has never been awarded or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - (a) an investment or an investment-related business or activity;
    - (b) fraud, false statement(s), or omissions;
    - (c) theft, embezzlement, or other wrongful taking of property;
    - (d) bribery, forgery, counterfeiting, or extortion; or
    - (e) dishonest, unfair, or unethical practices.
  - 2. Stock Management LLC has never been awarded or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - (a) an investment or an investment-related business or activity;
    - (b) fraud, false statement(s), or omissions;
    - (c) theft, embezzlement, or other wrongful taking of property;
    - (d) bribery, forgery, counterfeiting, or extortion; or
    - (e) dishonest, unfair, or unethical practices.
- E. Stock Management LLC, all supervising and supervised personal do not have any relationship or arrangement with any issuer of securities.

# Stock Management LLC

## BROCHURE SUPPLEMENT

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### Part 2B of Form ADV SEC Required Brochure Supplement

Professional Backgrounds of:

Ben Heeb (Principal, Managing member)

Susan Williams (Principal, Managing member)

Stock Managements staff members are evaluated on the basis of education and professional work experience, prior to hiring. Any associated persons involved in determining investment strategy or giving investment advice to clients must meet the examination or other licensing requirements of the states in which they provide services. The firm conducts pre-hiring background checks for all employees.

All firm personnel are monitored and supervised by one or more of the following: the firm's principals, Ben Heeb and/or Susan Williams (Chief Compliance Officer). Supervision is ongoing and includes trade supervision, email monitoring, monitoring of personal trading, periodic performance evaluations, staff meetings and direct communications. All employees listed herein receive compensation solely for their responsibilities at Stock Management LLC. No employee is actively engaged in any other investment business or occupation. The individuals in this report have no reportable disciplinary events to disclose.

This brochure supplement contains information about the advisory personnel on whom clients rely for investment advice. Among other things, this brochure supplement contains information about the educational background, business experience and disciplinary history (if any) of the supervised persons who provide advisory services to the clients. This is a supplement to the Stock Management LLC Investment Advisors brochure (Form ADV, Part 2A). Please contact the firm's Chief Compliance Officer, Susan Williams, or Ben Heeb at 253-535-5530, or via email to [invest@BenHeeb.com](mailto:invest@BenHeeb.com), if you have any questions about this supplement.

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CENTRALIA WA 98531-9007

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PHONE 360-669-0538

Fax: 253-531-8182

# Professional Biographies

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## Educational Background and Business Experience.

**Ben Heeb: President, Reg. Investment Advisor Representative**

**Born 1942**

**CRD# 3036833**

### Educational Background

- MBA, Duke University
- BA Mathematics, University of Washington, Seattle, WA
- Othello High School, Othello, WA
- Series 65 (NASD Uniform Investment Advisor Law Examination) 5/20/1998
- Series 24 (General Securities Principal Qualification Examination) 9/04/1985

### Business Experience

- Owner, Managing Member -Founded the Stock Management LLC (SEC Registered), 1984
- US Navy Commander, Retired 1984
- Action Officer - Office of the Joint Chiefs of Staff, Pentagon, Washington DC 1982-1984
- Team leader - Office of the Inspector General of the Navy Supply Corps 1981-1982
- Program Manager, NAVSUP US Navy 1979-1981

Contact information: Office 253-535-5530 email: [Ben@BenHeeb.com](mailto:Ben@BenHeeb.com)

*Principals are not directly supervised by another employee, with the exception of compliance-related monitoring conducted by the firm's Chief Compliance Officer.*

1. Ben Heeb has never been awarded or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
  - (a) an investment or an investment-related business or activity;
  - (b) fraud, false statement(s), or omissions;
  - (c) theft, embezzlement, or other wrongful taking of property;
  - (d) bribery, forgery, counterfeiting, or extortion; or
  - (e) dishonest, unfair, or unethical practices.
2. Ben Heeb has never been awarded or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - (a) an investment or an investment-related business or activity;
  - (b) fraud, false statement(s), or omissions;
  - (c) theft, embezzlement, or other wrongful taking of property;
  - (d) bribery, forgery, counterfeiting, or extortion; or
  - (e) dishonest, unfair, or unethical practices.

Ben Heeb, all supervising and supervised personal do not have any relationship or arrangement with any issuer of securities.

Ben Heeb has never been the subject of a bankruptcy petition.

# Professional Biographies

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## Educational Background and Business Experience.

**Susan M Williams: Vice President, Reg. Investment Advisor Rep**

**Born 1970**

**CRD# 3062867**

### Educational Background

- University of Puget Sound, Tacoma, WA 1988-1989
- Rogers High School, Puyallup WA 1985-1988
- Series 65 (NASD Uniform Investment Advisor Law Examination) 1998

### Business Experience

- Owner Managing Member - Stock Management LLC 1984-1989, 1997-Present
- Accountant - Accounting Staff, Japan Airlines Subsidiary, Seattle, WA 1990-1996
- Independent contractor - Instructing Accounting Software, Business Set Up 1985-1990
- Volunteer at PTA, Reading Incentives, Book Fairs, Church, Boy Scouts of America, Cultural Activities, various other charities.
- French Speaking

Contact information: Office 253-535-5530 Direct 253-820-9860 email: [Susan@BenHeeb.com](mailto:Susan@BenHeeb.com)

*Principals are not directly supervised by another employee, with the exception of compliance-related monitoring conducted by the firm's Chief Compliance Officer.*

1. Susan Williams has never been awarded or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
  - (a) an investment or an investment-related business or activity;
  - (b) fraud, false statement(s), or omissions;
  - (c) theft, embezzlement, or other wrongful taking of property;
  - (d) bribery, forgery, counterfeiting, or extortion; or
  - (e) dishonest, unfair, or unethical practices.
2. Susan Williams has been awarded or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - (a) an investment or an investment-related business or activity;
  - (b) fraud, false statement(s), or omissions;
  - (c) theft, embezzlement, or other wrongful taking of property;
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