

**Cover Page - Item 1**

**Firm Brochure**  
(Form ADV Part 2A Brochure)

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This brochure provides information about the qualifications and business practices of DREHER INVESTMENT SERVICES, INC. If you have any questions about the contents of this brochure, please contact us at: 325-486-8600, or by email at: [spencer.plagens@dreherco.com](mailto:spencer.plagens@dreherco.com) or [katy.taylor@dreherco.com](mailto:katy.taylor@dreherco.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 DREHER INVESTMENT SERVICES, INC. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**March 26, 2024**

## Material Changes - Item 2

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### Annual Update

On March 26, 2024, we submitted our annual updating amendment filing for fiscal year 2023.

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### Material Changes since the Last Update

Since our previous annual updating amendment submitted to regulators on February 15, 2023, we have made no material changes.

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### Full Brochure Available

In addition to the changes noted above, we encourage you to carefully review our full Firm Brochure. If you have questions about these changes or if you would like to receive a complete copy of our most recent Firm Brochure free of charge, at any time, please contact us by telephone at: 325-486-8600 or by email at [katy.taylor@dreherco.com](mailto:katy.taylor@dreherco.com).

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## Advisory Business - Item 4

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### **Firm Description**

DREHER INVESTMENT SERVICES, INC., was founded in 1996.

DREHER INVESTMENT SERVICES, INC. is an Investment Advisory firm which provides personalized confidential and customized investment design and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, and small businesses.

DREHER INVESTMENT SERVICES, INC. services are provided through consultation with the client and may include: determination of financial objectives, investment management, retirement planning, asset allocation, implementation of investments based on the allocation models agreed upon by the client, and quarterly reporting of investment performance.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) may be engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting with a client is free of charge and is considered an exploratory interview to determine the extent to which investment management may be beneficial to the client.

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### **Principal Owners**

DREHER INVESTMENT SERVICES, INC. has no single shareholder with an ownership share of 25% or more.

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### **Types of Advisory Services**

DREHER INVESTMENT SERVICES, INC. provides asset allocation services; implementation of investment design utilizing allocation model agreed upon by the client; monitoring of investment markets; and quarterly reporting of investment performance.

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### **Tailored Relationships**

DREHER INVESTMENT SERVICES, INC. tailors investment allocation models based upon the individual needs and characteristics of each client such as age, employment status, risk tolerance, cash flow requirements, and tax considerations. Each client may impose restrictions on investing in certain securities or types of securities within their asset account. Each client has the right to invest in securities that may or may not be recommended by DREHER INVESTMENT SERVICES, INC.

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### **Wrap Fee Program**

DREHER INVESTMENT SERVICES, INC. does not participate in a Wrap Fee Program.

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**Asset Management**

As of December 31, 2023, DREHER INVESTMENT SERVICES, INC. manages approximately \$221,202,412 in assets for approximately 308 clients on a discretionary basis. \$0.00 is managed on a non-discretionary basis.

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**Termination of Advisory Agreement**

A Client may terminate their Advisory Agreement with DREHER INVESTMENT SERVICES, INC. by notifying DREHER INVESTMENT SERVICES, INC. with a written 30-day notice. Advisory fees incurred up to the date of termination of the Advisory Agreement indicated in the written 30-day notice from the client will be due and payable within 30 days after said termination date.

DREHER INVESTMENT SERVICES, INC. may terminate the Advisory Agreement with the Client under the same terms stated in the paragraph above.

## **Fees and Compensation - Item 5**

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**Description**

DREHER INVESTMENT SERVICES, INC. provides strictly fee-only based investment advisory services. Fees are calculated on a percentage of assets under management. Our fee schedule is as follows; however, fees are negotiable:

Private Clients

	Effective Rate:
Blended Accounts (>50% Equity Funds):	
1.25% on the first \$250,000	1.25%
1.10% on the next \$250,000	1.18%
1.00% on the next \$500,000	1.09%
0.85% on the next \$1,500,000	0.95%
0.70% on the next \$2,500,000	0.82%
Negotiated over \$5,000,000	
Blended Accounts (25-50% Equity Funds):	
0.80% on the first \$1,000,000	0.80%
0.70% on the next \$1,500,000	0.74%
0.60% on the next \$2,500,000	0.67%
Negotiated over \$5,000,000	
Blended Accounts (<25% Equity Funds):	
0.65% on the first \$1,000,000	0.65%
0.55% on the next \$1,500,000	0.59%
0.50% on the next \$2,500,000	0.55%
Negotiated over \$5,000,000	

Fixed income Account (no Equity Allocation):  
Negotiated

#### Retirement Plan Accounts

Plan fees are negotiated with Plan Sponsor on a Plan-by-Plan basis. Plan fees will be paid by Participants or Plan Sponsor based on the Agreement with Plan Sponsor. Fees will be paid monthly or quarterly based on the Agreement with Plan Sponsor.

DREHER INVESTMENT SERVICES, INC. will give Client thirty (30) days written notice, via regular mail, facsimile and/or e-mail, of any change in the management fee schedule and written notice will be in the form of a letter and/or ADV Part 2 Disclosure Document to Client regarding said change(s).

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#### **Fee Billing**

Fees incurred for private client and Institutional accounts are calculated and billed monthly in *ARREARS*, meaning fees are billed to clients *AFTER* the monthly billing period has *ENDED*. We either bill the client directly for the payment of fees or the client authorizes us to electronically deduct fees from a designated client account to facilitate payment. The client consents to direct debiting of their investment account in both the Advisory Agreement with DREHER INVESTMENT SERVICES, INC. and the account application with the custodial institution holding client's assets under management with DREHER INVESTMENT SERVICES, INC.

Fees incurred for Retirement Plan clients are calculated and billed on a monthly or quarterly basis in *ARREARS*, meaning that fees are billed to client after the monthly or quarterly billing period has *ENDED*. Plan Sponsors have the choice of how advisory fees are to be paid to DREHER INVESTMENT SERVICES, INC.

**Negotiability of Fees:** We allow the individual Advisor servicing the account to negotiate the exact investment management fees within the range disclosed in our Form ADV Part 2A Brochure. As a result, the Advisor servicing your account may charge more or less for the same service than another Advisor of our firm. Further, our annual investment management fee may be higher than that charged by other investment advisors offering similar services/programs.

**Billing on Cash Positions:** Unless otherwise negotiated with the client, the firm generally treats cash and cash equivalents as an asset class.

Accordingly, unless otherwise agreed in writing, all cash and cash equivalent positions (e.g., money market funds, etc.) are included as part of assets under management for purposes of calculating the firm's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), the firm may maintain cash and/or cash equivalent positions for defensive, liquidity, or other purposes. While assets

are maintained in cash or cash equivalents, such amounts could miss market advances and, depending upon current yields, at any point in time, the firm's advisory fee could exceed the interest paid by the client's cash or cash equivalent positions.

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**Other Fees**

The Custodian of a client's assets may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security. The Custodian determines these fees and they will be deducted from client's account in accordance with the account application with the Custodian.

Assets are invested primarily in no-load or low-load mutual funds and exchange-traded funds, usually through the Custodian where the client's assets are held. Mutual Funds charge each fund shareholder fees which are disclosed in the fund prospectus. The Custodian may charge a transaction fee for the purchase and/or sale of some mutual funds.

Investments may also include: equities (stocks), corporate debt securities, commercial paper, certificates of deposit, municipal securities and U. S. government securities. The Custodian may charge a transaction fee for the purchase and/or sale of these securities.

DREHER INVESTMENT SERVICES, INC. does not receive any compensation, in any form, from any custodial institution, mutual fund company or brokerage firm.

Initial public offerings (IPOs) are not available through DREHER INVESTMENT SERVICES, INC.

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**IRA Rollover Considerations**

As a normal extension of financial advice, we provide education or recommendations related to the rollover of an employer-sponsored retirement plan. A plan participant leaving employment has several options. Each choice offers advantages and disadvantages, depending on desired investment options and services, fees and expenses, withdrawal options, required minimum distributions, tax treatment, and the investor's unique financial needs and retirement plans. The complexity of these choices may lead an investor to seek assistance from us.

An Associated Person who recommends an investor roll over plan assets into an Individual Retirement Account ("IRA") may earn an asset-based fee as a result, but no compensation if assets are retained in the plan. Thus, we have an economic incentive to encourage an investor to roll plan assets into an IRA. In most cases, fees and expenses will increase for the investor as a result because the above-described fees will apply to assets rolled over to an IRA, and outlined ongoing services will be extended to these assets.



We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. We have to act in your best interests and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests.

## **Performance-Based fees and Side-By-Side Management - Item 6**

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DREHER INVESTMENT SERVICES, INC. does not accept any type of performance-based fees or side-by-side management fees associated with the assets of our clients.

## **Types of Clients - Item 7**

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### **Description**

DREHER INVESTMENT SERVICES, INC. generally provides investment advice to individuals, charitable organizations and corporations.

### **Account Minimums**

At this time, there is no account minimum.

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

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### **Methods of Analysis**

DREHER INVESTMENT SERVICES, INC. uses the following processes and resources in formulating investment advice and/or managing client assets:

Charting, assessment of fundamental economic indicators and trends, technical analysis, and cyclical analysis.

The firm's primary sources of information include, but are not limited to, financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that DREHER INVESTMENT SERVICES, INC. may use include Morningstar Principia mutual fund information, Morningstar Principia stock information, Fi360, Charles Schwab & Company's "SchwabLink" service, and the World Wide Web.

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## **Investment Strategies**

DREHER INVESTMENT SERVICES, INC. provides investment management utilizing various weightings of equity, fixed income, and cash (money market) securities, none of which involve frequent trading. The disciplines utilized to minimize investment risk in these basic investment sectors are as follows:

Equity Investments – Equity mutual funds\* are the predominant tool for equity investing rather than individual common stocks. This allows for extensive diversification of equity holdings across a broader range of capitalization sizes and geographical positioning. This practice contributes to a reduced level of risk versus concentrated investing in a smaller universe of equity securities. A limited percentage of equity positioning may be in the form of individual publicly-traded common stocks. The objectives for such investments are long-term growth and attractive dividends. When approved by more sophisticated investors, we utilize covered call-writing programs to add additional income when warranted.

Fixed Income Investments – Positioning in fixed income securities utilizes either conservative bond mutual funds\* or individual positioning in either U.S. Government or investment-grade Corporate bonds. At the request of some of our larger net-worth clients, we utilize private fund managers to further diversify our investors' fixed income allocation.

\*DREHER INVESTMENT SERVICES, INC. utilizes its load-waived trading capability through its Custodian to minimize fund commission costs on all fund purchases and sales.

A Client's Portfolio is globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

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## **Risk of Loss**

DREHER INVESTMENT SERVICES, INC. makes it clear to every client that investing in securities, even in the most conservative of strategies, can involve a risk of loss that clients should be aware of and be prepared to bear when making investment decisions.

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.
- **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.
- **Concentrated Position Risk:** Certain Associated Persons may recommend that clients concentrate account assets in an industry or economic sector. In addition to the potential concentration of accounts in one or more sectors, certain accounts may, or may be advised to, hold concentrated positions in specific securities. Therefore, at times, an account may, or may be advised to, hold a relatively small number of securities positions, each representing a relatively large portion of assets in the account. As a result, the account will be subject to greater volatility than a more sector diversified portfolio. Investments in issuers within an industry or economic sector that experiences adverse economic, business, political conditions, or other concerns will impact the value of such a portfolio more than if the portfolio's investments

were not so concentrated. A change in the value of a single investment within the portfolio will affect the overall value of the portfolio and will cause greater losses than it would in a portfolio that holds more diversified investments.

- **Cybersecurity Risks:** Our firm and our service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes, and practices designed to protect networks, systems, computers, programs, and data from cyber-attacks and hacking by other computer users, and to avoid the resulting damage and disruption of hardware and software systems, loss or corruption of data, and/or misappropriation of confidential information. In general, cyber-attacks are deliberate; however, unintentional events may have similar effects. Cyber-attacks may cause losses to clients by interfering with the processing of transactions, affecting the ability to calculate net asset value or impeding or sabotaging trading. Clients may also incur substantial costs as the result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, and the dissemination of confidential and proprietary information. Any such breach could expose our firm to civil liability as well as regulatory inquiry and/or action. In addition, clients could be exposed to additional losses as a result of unauthorized use of their personal information. While our firm has established a business continuity plan and systems designed to prevent cyber-attacks, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified. Similar types of cyber security risks are also present for issuers of securities, investment companies and other investment advisers in which we invest, which could result in material adverse consequences for such entities and may cause a client's investment in such entities to lose value.
- **Pandemic Risk:** Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption. It is difficult to predict the long-term impact of such events because they are dependent on a variety of factors including the global response of regulators and governments to address and mitigate the worldwide effects of such events. Workforce reductions, travel restrictions, governmental responses and policies and macroeconomic factors could negatively impact investment returns.

## Disciplinary Information - Item 9

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### Legal and Disciplinary

DREHER INVESTMENT SERVICES, INC. and its employees have not been involved in any legal or disciplinary events related to past or present investment clients.

## Other Financial Industry Activities and Affiliations - Item 10

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### Financial Industry Activities

Neither DREHER INVESTMENT SERVICES, INC., nor any of its employees, is registered or has an application pending to register as a broker-dealer, or a futures commission merchant, commodity pool operator or commodity trading advisor.

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### Affiliations

DREHER INVESTMENT SERVICES, INC. does not have arrangements that are material to its advisory services or its clients with any related person listed below:

- 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 adviser and/or financial planner
- Future 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
- Sponsor or syndicator of limited partnerships

DREHER INVESTMENT SERVICES, INC. does not recommend or select other investment advisers for our clients. We do not receive compensation directly or indirectly from any other adviser that would create a material conflict of interest for our clients. DREHER INVESTMENT SERVICES, INC. does not have any business relationship with any other adviser that would create a material conflict of interest for our clients.

# Code of Ethics, Participation or Interest in Client transactions and Personal Trading - Item 11

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## Code of Ethics

DREHER INVESTMENT SERVICES, INC.'s Code of Ethics consists of an outline of policies regarding several key areas: standards of conduct and compliance with laws, rules and regulations, protection of material non-public information and personal securities trading. It also consists of specific information and guidance that is provided in DREHER INVESTMENT SERVICES, INC.'s company policies and procedures for their employees. We will provide a copy of the Code of Ethics to any client or prospective client upon request.

The Code includes DREHER INVESTMENT SERVICES, INC.'s policies and procedures developed to protect client's interests in relation to the following topics:

- The duty at all times to place the interests of clients first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the Code;
- The responsibility to avoid any actual or potential conflict of interest or misuse of an employee's position of trust and responsibility;
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential; and
- The principle that independence in the investment decision-making process is paramount.

A copy of DREHER INVESTMENT SERVICES, INC.'s Code of Ethics is available upon request to our firm by phone at 325-486-8600 or by email at [spencer.plagens@dreherco.com](mailto:spencer.plagens@dreherco.com).

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## Participation or Interest in Client Transactions

DREHER INVESTMENT SERVICES, INC. does not recommend, buy or sell for any client account, securities in which there is a material financial interest for DREHER INVESTMENT SERVICES, INC. and/or its employees. For example, we do not, as principal, buy securities from or sell securities to clients, we are not the general partner in a partnership in which clients are solicited to invest, and we are not the investment adviser to any private investments in which clients are invested or solicited to invest.

However, at times, DREHER INVESTMENT SERVICES, INC. and/or its employees may take positions in the same or related securities as clients, which may pose a conflict of interest with clients. In an effort to uphold our fiduciary duties to clients, DREHER INVESTMENT SERVICES, INC. and its employees will generally be "last in" and "last out" for the trading day when

trading occurs in close proximity to client trades. Front running (trading shortly ahead of Clients) is prohibited. Should a conflict occur because of materiality (e.g., a thinly traded stock), disclosure will be made to the client(s) at the time of trading. Incidental trading not deemed to be a conflict (e.g., a purchase or sale that is minimal in relation to the total outstanding value, and as such would have negligible effect on the market price) would not be deemed a material conflict requiring disclosure at the time of trading. We may also combine our orders to purchase securities with your orders to purchase securities ("block trading"). Please refer to the "Brokerage Practices" section in this brochure for information on our block trading practices.

DREHER INVESTMENT SERVICES, INC. uses the same securities in its 401(k) plan that are recommended to and used by other 401(k) Plan clients for their plans. Transactions on all 401(k) plans are made at the same time. This does not present a conflict of interest for any client.

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### **Personal Trading**

The Chief Compliance Officer of DREHER INVESTMENT SERVICES, INC. is Spencer Plagens. Personal trading is not allowed by DREHER INVESTMENT SERVICES, INC. employees unless the trades are first reviewed and approved by the CEO of DREHER INVESTMENT SERVICES, INC. This review ensures that the personal trading of employees does not affect the markets and that our clients' interests are always the firm's first priority.

## **Brokerage Practices - Item 12**

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### **Selecting Brokerage Firms**

Client assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC, as the qualified custodian. Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us.

We are independently owned and operated and not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor.

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- capability to execute, clear and settle trades (buy and sell securities for your account)
- capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.)
- availability of investment research and tools that assist us in making investment decisions
- quality of services
- competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them
- reputation, financial strength and stability of the provider
- their prior service to us and our other clients
- availability of other products and services that benefit us, as discussed below (see “Products and Services Available to Us from Schwab”)
- Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account, as described in the next paragraph.

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### **Your Custody and Brokerage Cost**

Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Schwab’s commission rates applicable to our client accounts were negotiated based on our commitment to maintain \$10 million of our clients’ assets statement equity in accounts at Schwab. This commitment benefits you because the overall commission rates you pay are lower than they would be if we had not made the commitment. In addition to commissions Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account.

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### **Best Execution**

DREHER INVESTMENT SERVICES, INC. reviews and documents the execution of trades at each custodian at the time trades are placed with the custodian. If transaction/trading fees are charged by the custodians, they are



reviewed at the time trades are placed with the custodian of record for clients. DREHER INVESTMENT SERVICES, INC. does not receive any portion of a transaction/trading fee, if there is any.

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**Research and Other Soft Dollar Benefits**

Although not considered “soft dollar” compensation, DREHER INVESTMENT SERVICES, INC. may receive benefits from Schwab Advisor Services (formerly called Schwab Institutional) in the form of access to its institutional brokerage, trading, custody, reporting and related services, many of which are not typically available to Schwab retail customers.

Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts while others help us manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us as long as we keep a total of at least \$10 million of our clients’ assets in accounts at Schwab. If we have less than \$10 million in client assets at Schwab, it may charge us quarterly service fees. Below is a detailed description of Schwab’s support services:

*Services that Benefit You:* Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account.

*Services that May Not Directly Benefit You:* Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts. They include investment research, both Schwab’s own and that of third parties. We may use this research to service all or some substantial number of our clients’ accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients’ accounts; and
- assist with back-office functions, recordkeeping, and client reporting.

*Services that Generally Benefit Only Us:* Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

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

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

DREHER INVESTMENT SERVICES, INC. understands its duty for best execution and considers all factors in making recommendations to clients. These research services may be useful in servicing all DREHER INVESTMENT SERVICES, INC. clients, and may not be used in connection with any particular account that may have paid compensation to the firm providing such services. While DREHER INVESTMENT SERVICES, INC. may not always obtain the lowest commission rate, DREHER INVESTMENT SERVICES, INC. believes the rate is reasonable in relation to the value of the brokerage and research services provided.

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#### **Order Aggregation (Block Trading)**

DREHER INVESTMENT SERVICES, INC. may aggregate transactions in equity and fixed income securities for a client with other clients to improve the quality and cost of execution. When transactions are aggregated, the actual prices applicable to the aggregated transactions will be averaged, and the client account will be deemed to have purchased or sold its proportionate share of the securities involved at the average price obtained. DREHER INVESTMENT SERVICES, INC. may determine not to aggregate transactions, for example, based on the size of the trades, the number of client accounts, the timing of the trades, and the liquidity of the securities. If the firm does not aggregate orders, some clients purchasing securities around the same time may receive a less favorable price than other clients may receive. This means that this practice of not aggregating may cost clients more money. DREHER INVESTMENT SERVICES, INC. and/or its employees may participate in block trades with clients; however, DREHER INVESTMENT SERVICES, INC. and/or its employees will not participate on a pro rata basis for partial fills and they will not be given preferential treatment.

The Custodian of assets for our clients has a program in place called "Prime Brokerage" where an order aggregation can be used if a client meets with

specific qualifications set out by Custodian. Utilization of this program benefits the clients who do meet these qualifications.

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**Directed Brokerage**

We routinely require that you direct our firm to execute transactions through one or more broker-dealers with which we have a business relationship (e.g., Schwab). As such, we may be unable to achieve the most favorable execution of your transactions and you may pay higher brokerage commissions than you might otherwise pay through another broker-dealer that offers the same types of services. Not all advisers require their clients to direct brokerage.

## **Review of Accounts - Item 13**

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**Periodic Reviews**

Account reviews are performed quarterly by firm advisers, Charles D. Robertson, CEO/Advisor, Katy L. Taylor, Advisor, Spencer J. Plagens, President/CCO/Advisor and Rusty Taylor, CFO/Advisor. Account reviews are performed more frequently when market conditions dictate.

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**Nature of Reviews**

Account reviews focus on the performance of assets for a specific time period and opportunity to address any issues of concern regarding this performance. Account reviews also provide an opportunity to address appropriate adjustments in asset allocation due to any changes in client's financial situation.

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**Review Triggers**

Other conditions that may trigger a review are changes in the tax laws, new investment information, performance of assets within a client's account and changes in a client's financial situation.

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**Regular Reports**

A client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client are considered during regular reviews by the firm's advisers.

Clients receive quarterly communications on the performance of their accounts. This communication is in the form of a written report which includes, but is not limited to, a net worth statement and portfolio statement along with updated allocation percentages. Clients are encouraged to schedule meetings with an Advisor to discuss their quarterly reports or any time necessary to make an Advisor aware of any change in their financial situations that would have a bearing on the financial advice provided by an Advisor with the firm.

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

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### **Incoming Referrals**

DREHER INVESTMENT SERVICES, INC. has been fortunate to receive client referrals over the years. The referrals come from various sources such as current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. It is currently DREHER INVESTMENT SERVICES, INC.'s policy to provide no compensation to any person or entity for client referrals.

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### **Referrals Out**

DREHER INVESTMENT SERVICES, INC. does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

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### **Other Compensation**

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

## **Custody - Item 15**

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### **Account Statements**

DREHER INVESTMENT SERVICES, INC. does not have physical custody of any client's funds or securities. They will be held with a qualified custodian, such as Schwab. However, we are deemed to have custody of client assets because of the fee deduction authority granted by the client in the investment advisory agreement and in certain situations where we accept standing letters of authorization from clients to transfer assets to third parties. We maintain safeguards in accordance with regulatory requirements regarding custody of client assets.

We will only deduct the advisory fee from client accounts provided that we have authorization from the client, in writing, permitting the fees to be paid directly from the client's account(s) held by the qualified custodian, and the qualified custodian agrees to send the client a statement, at least quarterly, showing all funds deducted from the client's account(s) including the amount of the advisory fee paid directly to our firm. The qualified custodian will not determine whether the fee is accurately calculated; therefore, we encourage clients to carefully review each statement for accuracy.

Schwab provides monthly account statements, which are mailed directly to the client at the client's address of record or e-mailed to the client's personal e-mail address of record. Clients should contact us promptly at 325-486-8600 if they did not receive a statement or with questions regarding a statement.

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**Performance Reports**

Performance reports are provided to clients on a quarterly basis by DREHER INVESTMENT SERVICES, INC. Clients are urged to compare the account statements they receive from their qualified custodian to these performance reports.

## **Investment Discretion - Item 16**

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**Discretionary Authority for Trading**

DREHER INVESTMENT SERVICES, INC. accepts discretionary authority to manage securities accounts on behalf of clients. DREHER INVESTMENT SERVICES, INC. has the authority to determine, without obtaining specific client consent, the broker dealer to be used, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, DREHER INVESTMENT SERVICES, INC. consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given by the client. Currently, DREHER INVESTMENT SERVICES, INC. recommends the services of Charles Schwab & Co., Inc.

Clients are advised of the name of the custodian of their assets prior to the execution of the Advisory Agreement with DREHER INVESTMENT SERVICES, INC.

DREHER INVESTMENT SERVICES, INC. does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing orders for trades in clients' accounts on their behalf so that we may promptly implement the investment allocation as directed by each client.

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**Limited Power of Attorney**

A limited power of attorney is a trading authorization for this purpose. The client signs a limited power of attorney in our Advisory Agreement and in the custodian account application. These documents provide our firm with the authority to execute transactions appropriate for each client's investment design and objectives.

## Voting Client Securities - Item 17

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### Proxy Votes

The Client makes the decision to either personally vote proxies for securities held in his/her account(s) or to designate DREHER INVESTMENT SERVICES, INC. to vote proxies for securities over which it maintains discretionary authority consistent with its proxy voting policy. This designation is indicated in our Advisory Agreement and in the custodian account application which is executed by the client. A copy of DREHER INVESTMENT SERVICES, INC.'s proxy voting policy is available upon request.

We will determine how to vote proxies based on our reasonable judgment of the vote most likely to produce favorable financial results for you. Proxy votes generally will be cast in favor of proposals that maintain or strengthen the shared interests of shareholders and management, increase shareholder value, maintain or increase shareholder influence over the issuer's board of directors and management, and maintain or increase the rights of shareholders. Generally, proxy votes will be cast against proposals having the opposite effect. However, we will consider both sides of each proxy issue. Unless we receive specific instructions from you, we will not base votes on social considerations.

In the event you wish to direct our firm on voting a particular proxy, you should contact our main office at the telephone number on the cover page of this brochure with your instruction.

Conflicts of interest between you and our firm, or a principal of our firm, regarding certain proxy issues could arise. If we determine that a material conflict of interest exists, we will take the necessary steps to resolve the conflict before voting the proxies. For example, we may disclose the existence and nature of the conflict to you, and seek direction from you as to how to vote on a particular issue; we may abstain from voting, particularly if there are conflicting interests for you (for example, where your account(s) hold different securities in a competitive merger situation); or, we will take other necessary steps designed to ensure that a decision to vote is in your best interest and was not the product of the conflict.

We keep certain records required by applicable law in connection with our proxy voting activities. You may obtain information on how we voted proxies and/or obtain a full copy of our proxy voting policies and procedures by making a written or oral request to our firm.

## Financial Information - Item 18

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### Financial Condition

DREHER INVESTMENT SERVICES, INC. is not required to furnish a company Balance Sheet because it does not serve as a custodian for client funds or securities, and we do not require prepayment of fees.

DREHER INVESTMENT SERVICES, INC. has not been the subject of a bankruptcy petition at any time.

## Information Security - Miscellaneous

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### Information Security

DREHER INVESTMENT SERVICES, INC. maintains an information security program to reduce the risk that personal and confidential information may be breached.

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### Privacy Notice

DREHER INVESTMENT SERVICES, INC. is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from a client may include information about personal finances, information about health to the extent that it is needed for the financial planning process, information about transactions between the client and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help meet a client's personal financial goals.

We will disclose limited information to attorneys, accountants, and mortgage lenders with whom a client has established a relationship, but only with client permission. With permission, we share a limited amount of information about a client with the brokerage/custodial firm holding a client's assets in order to execute securities transactions on their behalf.

We maintain a secure office to ensure that information is not placed at unreasonable risk. We employ a firewall barrier and authentication procedures in our computer environment.

We do not provide personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to a client's personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and a client's personal records as permitted by law.

Personally identifiable information about clients will be maintained while employing DREHER INVESTMENT SERVICES, INC.'s services and for the required period thereafter that records are required to be maintained by

federal and state securities laws. After that time, information may be destroyed.

A copy of our *Privacy Notice* is given to our clients upon execution of DIS Advisory Agreement and if there is a material change to our policy, it will be mailed to our clients at the time of the change of the policy.

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