

# **Firm Brochure**

(Part 2A of Form ADV)

**-COVER PAGE-**

**Fama Fiduciary Wealth LLC**  
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**Rochester, New York 14623-2950**  
**Tel: (585) 292-6007**  
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This brochure provides information about the qualifications and business practices of FAMA FIDUCIARY WEALTH LLC. If you have any questions about the content of this brochure, please contact us at (585) 292-6007 or e-mail us at [andrew@famawealth.com](mailto:andrew@famawealth.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 FAMA FIDUCIARY WEALTH LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can view information on this website by searching for "Fama Fiduciary Wealth LLC". You can also search using the Firm's CRD number. The CRD number for the Firm is 125627.

**Any reference in this brochure to the terms "registered investment adviser", "registered investment advisor", or "registered" in no way implies a certain level of skill or training.**

Date of this brochure: **March 14, 2024**

## **Item 2: Material Changes**

Since our last annual update was filed in **February 2023**, there have been no material changes in connection with the firm or with its management and/or employees.

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### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us at (585) 292-6007

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## **Item 4: Advisory Business**

**Firm Description & Principals.** Fama Fiduciary Wealth LLC is a New York Limited Liability Company. It was originally founded as a sole proprietorship in 2001 under the name “Andrew J. Fama Asset Management”. In 2007, we became a Limited Liability Company (LLC) amending our name to “Andrew J. Fama Asset Management, LLC”. On May 16, 2012, the firm name was changed to “Dimensional Wealth Management LLC” via state filing in NY. On January 17, 2013, the firm name was changed to “Fama Fiduciary Wealth LLC” (*hereinafter, the “Firm”*) via state filing in New York. On November 4, 2013, an application for registration with the Securities and Exchange Commission (SEC) was filed. On December 14, 2013, the SEC application was accepted.

The owner, principal, and sole member of the Firm is Andrew J. Fama. There are no other “related persons” or “management persons”. We are not associated with any intermediate subsidiaries.

**Real Fiduciary™ Advisor Affirmation Program (Institute for the Fiduciary Standard):** The Firm and its principals have voluntarily subscribed to the “Real Fiduciary™ Practices” published by the Institute for the Fiduciary Standard. Real Fiduciary™ Practices offer a simple code of conduct and outline a commitment to clients of subscribing financial advisors. They seek to clearly articulate what a client can expect to receive from a subscribing financial advisor. These Real Fiduciary™ Practices do not replace our regulatory compliance obligations or duties to clients under relevant laws, rules, or regulations. The Institute for the Fiduciary Standard’s role is limited to publishing the practices as well as maintaining a corresponding register of subscribing financial advisors.

You can verify our affirmation of Real Fiduciary™ Practices at [www.famawealth.com](http://www.famawealth.com) or at the Institute for the Fiduciary Standard website at [www.thefiduciaryinstitute.org](http://www.thefiduciaryinstitute.org). The practices can be found at <https://thefiduciaryinstitute.org/wp-content/uploads/2019/03/Real-Fiduciary-Practices-2019-02-22.pdf>.

**Advisory Services Offered.** We provide clients with investment management services with respect to their investment accounts. Our clients are primarily individuals and their families, but we also offer services to trustees, executors, qualified retirement plans, and business entities.

We construct portfolios based on our assessment of a client's risk profile, investment objective(s), time horizon, withdrawal or spending needs, account restrictions (if any), and overall financial situation.

We assist the client in opening a new account at the custodian. We help prepare the individual account paperwork on the client’s behalf. If applicable, for a new client we facilitate transferring client funds from a prior custodian to the new custodian as instructed by the client.

Portfolios generally consist of no-load mutual funds, including index mutual funds, and exchange-traded funds (ETFs). We do not generally recommend or use individual equity or fixed income securities, although some client accounts do hold these.

Clients have the right to place reasonable restrictions on the types of investments to be held in the portfolio, provided that such restrictions are stated in writing.

We periodically refer clients to an accountant or attorney for development of tax or estate plans. The client's personal attorney is solely responsible for providing legal advice and documents. The client's personal tax adviser or accountant is solely responsible for any tax or accounting advice.

**No Wrap Fee Programs.** We do not participate in wrap fee programs.

**Assets Under Management.** As of **December 31, 2023**, Fama Fiduciary Wealth LLC managed \$79,446,123 in assets for 59 clients on a discretionary basis. A married couple is considered to be a single client for purposes of this disclosure. "*Investment Discretion*" is discussed in Item 16 below.

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

**Fee-Only Compensation.** We are a fee-only advisory firm. We do not sell annuities, insurance, options, futures, limited partnerships or any commissioned product. We are not affiliated with any broker-dealer or any entity which sells commissioned products. The Firm accepts no commissions or other compensation, including asset-based sales charges or service fees, in connection with the sale of mutual funds or other investment products. See **Item 12** for further discussion of our *Brokerage Practices*.

**How We Are Compensated.** Our fees are typically based on a percentage of assets managed and are paid quarterly, *in arrears*. The quarterly fee calculation is based on the aggregate market value of the assets under management on the last business day of the preceding calendar quarter. Fees are either deducted directly from a client account or, at the client's request, billed separately.

The billing for a partial quarter will be calculated based on either the starting date (in the case of a newly funded account) or the ending date (in the case of a departing client who removes their assets from our platform), whichever is applicable. Any such fees will be calculated on a pro-rata basis in accordance with the starting or ending date, respectively. The starting date is generally the day the account is funded, and we can determine that the assets under management are held by the custodian and the account is available for trading.

Our fees are calculated using the following fee schedule:

<b><u>Assets Under Management</u></b>	<b><u>Annual Fee Rate</u></b>	<b><u>Quarterly Fee</u></b>
<b>On the first \$1,000,000</b>	<b>0.95%</b>	<b>0.2375%</b>
<b>Excess over \$1 million</b>	<b>0.55%</b>	<b>0.1375%</b>
<b>Excess over \$5 million</b>	<b><i>negotiable</i></b>	<b><i>negotiable</i></b>

We reserve the right in our sole discretion to negotiate lower fees on a case-by-case basis. As a result, fees set forth in a client agreement can sometimes be less than as stated in the above schedule. This means the actual fee a client is charged may be more or less than the fee charged to a similarly situated client.

If we provide hourly or fixed fee account review services to individuals seeking investment advice on a limited or one-time only basis, the hourly rate for account review services is negotiable but will not exceed \$450 per hour. If we provide services for a fixed fee, we agree on the fee with the client prior to rendering services.

**Other Fees and Expenses.** Our investment management fees as stated above do not include certain other fees and expenses incurred by the client. The client pays all brokerage commissions and transaction fees in connection with account transactions from the assets in their account. These fees are charged directly by and paid to the custodian.

In addition, mutual funds and exchange-traded funds have an expense ratio that represents the percentage of the fund's asset value charged as an expense for operating the fund. Mutual fund shares or ETF shares in a client's account are subject to other fees and expenses that are described in the fund prospectus. These other fees and expenses are not paid to us.

Both the transaction fee and the expense ratio are fees which the client pays *in addition to* our advisory fee. Performance figures published by mutual fund companies generally reflect total return *after* both the expense ratio and any other fund management fees have been deducted.

**Cash Positions.** The Firm continues to treat cash and money funds as an asset class. As such, unless determined to the contrary by the Firm, all cash positions (money markets, etc.) shall continue to be included as part of assets under management for purposes of calculating our 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 positions for defensive purposes. In addition, while assets are maintained in cash, such amounts could miss market advances. Depending upon current yields, at any point in time, our advisory fee could exceed the interest paid by the client's money market fund.

## **Item 6: Performance-Based Fees**

We do not charge or accept performance-based fees or fees based on a share of capital gains on or capital appreciation of the client's assets. We do not recommend investments which use performance-based fees.

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

We provide investment advisory services to individuals, trusts, estates, self-employed pension and profit-sharing plans, corporations, partnerships and small businesses.

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

**Methods of Analysis.** Our investment analysis includes a variety of methods. We get our information from the following sources: Financial websites on the World Wide Web, investment newsletters and publications, financial magazines and periodicals, research materials prepared by independent third parties (this includes Morningstar, Inc.), custodian platform research and live and recorded webinars and educational sessions presented by investment firms and financial media.

### **Investment Strategies.**

**Item 8 (a): Asset Allocation:** Our primary investment strategy is to focus on properly allocating the client's assets. Asset allocation aims to balance risk and reward by apportioning portfolio assets according to the client's individual goals, risk tolerance and investment horizon. We

believe that asset allocation is one of the most important decisions that investors make. The asset allocation we recommend is based on a combination of factors important to the client. These include: the client's personal risk tolerance profile and investing personality, the length of the client's investment horizon and income distribution needs.

**Item 8 (b): Diversification:** We seek to diversify the types of investments in a client account. This is part of the asset allocation approach described above. Diversification is a risk management technique that mixes a wide variety of investments within a portfolio. The rationale behind this technique is that a portfolio of different kinds of investments will yield higher returns over time. The diversified portfolio is also expected to pose a lower risk than any individual investment found within the portfolio. Diversification strives to smooth out unsystematic risk events in a portfolio so that the positive performance of some investments will neutralize the negative performance of others. Therefore, the benefits of diversification will be effective only if the investments in the portfolio are not perfectly correlated.

**Item 8 (c): Modern Portfolio Theory (MPT):** Asset allocation and diversification are basic principles of what is known as Modern Portfolio Theory. Modern Portfolio Theory focuses on the relationship of all the investments in a client's portfolio rather than looking at investments in isolation from each other. Risk is inherent when investing in any asset class. Greater risk is generally associated with higher expected investment returns, but greater risk does not necessarily lead to higher returns. Asset allocation and diversification do not ensure a profit or prevent a portfolio from experiencing a loss.

**Excessive Trading:** Our investment philosophy is grounded in the belief that clients should invest for the long-term and avoid unnecessary trading that incurs transaction costs or taxable sales. The avoidance of such excess trading generally inures to the benefit of the client in maintaining their overall investment strategy and desired asset allocation and risk levels.

**Material Risks Involved in All Investing.** All investment strategies have risks to the client which take various forms. Investing in securities of any kind involves risk of loss that clients should be prepared to bear. Furthermore, past performance is no guarantee of future results.

Because of the inherent risk of loss associated with investing, the Firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. Clients should be aware that the following investment risks exist within any strategy:

**Interest-Rate Risk:** Fluctuations in interest rates cause investment prices to fluctuate. For example, when interest rates rise, the market value (price) of bonds will decline. This is because the yields on existing bonds become less attractive.

**Inflation Risk:** Purchasing power erodes as the rate of inflation increases. When inflation grows, the value of a currency (such as the dollar) will not be as valuable as it had been in a lower inflationary environment.

**Market Risk:** Also known as "systematic risk" or "un-diversifiable risk". This risk cannot be diversified away. The price of an investment sometimes declines in reaction to external events or conditions which are independent from that investment's underlying fundamental value. For example, political, economic or social events or conditions can trigger market responses which can cause declines.

Currency Risk: Foreign investments in particular are susceptible to fluctuations in the value of the U.S. dollar versus the currency of another country in which the investment is held. This is also known as “exchange rate risk”.

Reinvestment Risk: This is the risk that proceeds from current investments must be reinvested at lower interest rate in the future, thus lowering the rate of return. This issue pertains mostly to fixed income investments—such as bonds or CD’s.

Business Risk: These are risks associated with a particular industry or company within an industry.

Liquidity Risk: An investment is liquid if an investor can easily and quickly convert the investment into cash. Investments which are in higher demand or are suitable for a broader range of investors are highly liquid. An example would be Treasury bills. An example of an illiquid investment is real estate investment property, because there is a limited demand. There is only a small group of individuals willing or able to own real estate compared with other investments.

Financial Risk: During times of financial strain, a company’s inability to meet its debt obligations sometimes results in a declining market value for its stock. It might also result in a bankruptcy filing.

Tracking Error Risk: This risk is specific to index mutual funds and ETFs. Tracking error measures the discrepancy between the fund's returns and the returns of the target index.

ETF Trading Risks: Because ETFs are bought and sold like stocks, the spread between the bid price and ask price is an additional cost and, therefore, a risk for investors. Another trading risk involves ETFs trading at a premium or discount to the value of the underlying securities. Yet another risk is the potential for improper trade execution and the risk that a trade executes at other than the intended price. These trading risks are one important way in which ETFs differ from comparable open-end mutual funds.

Key Person Risk: Andrew J. Fama, the firm's sole owner, holds primary responsibility for the management of the client's assets. As a result, the continuation of the firm's advisory services to clients is dependent heavily upon the ability of Mr. Fama to provide investment advice. Consequently, in the event of the death or permanent disability of Mr. Fama, the firm would be unable to furnish investment advice to its clients. Investing in any security involves risk of loss that the investor should be prepared to bear.

## **Item 9: Disciplinary Information**

We have not been involved in any legal or disciplinary events related to past or current investment advisory clients under either our current name or any prior name.

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

The Firm is not registered and does not have any application pending to register as any of the following: 1) a broker-dealer (or a registered representative of a broker-dealer), 2) a futures commission merchant, 3) a commodity pool operator, 4) a commodity trading advisor, or 5) an associated person of any of the foregoing entities. We do not have any material conflicts of



interest with any related persons or other investment advisors. We do not receive compensation from other advisors.

Related Persons: Andrew J. Fama is both a “related person” and a “management person”.

**Andrew J. Fama, Attorney-at-Law.** Andrew J. Fama, the sole owner of Fama Fiduciary Wealth LLC is a licensed attorney providing legal services through Andrew J. Fama, Attorney-at-Law. Because Mr. Fama is the majority owner of Fama Fiduciary Wealth LLC and the majority owner of Andrew J. Fama, Attorney-at-Law, the two firms are affiliated companies sharing common office space. From time to time, Andrew J. Fama, Attorney-at-Law will recommend Fama Fiduciary Wealth LLC to certain legal clients in need of financial planning or investment management services. From time to time, Fama Fiduciary Wealth LLC will recommend Andrew J. Fama, Attorney-at-Law to certain advisory clients in need of legal services. Both companies have a conflict of interest when recommending the other due to our affiliation. For example, there are other law firms that provide similar legal services at less expensive hourly rates or for lower fees. No Fama Fiduciary Wealth LLC client is obligated to use the services of Andrew J. Fama, Attorney-at-Law. The services of Fama Fiduciary Wealth LLC and Andrew J. Fama, Attorney-at-Law are separate and distinct from one another, each with a separate compensation arrangement typical for the services rendered. There are no referral fee arrangements between Fama Fiduciary Wealth LLC and Andrew J. Fama, Attorney-at-Law for these recommendations.

**Andrew J. Fama, Licensed Real Estate Broker.** Andrew J. Fama, the sole owner of Fama Fiduciary Wealth LLC is a licensed real estate broker in the state of New York. From time to time, he will occasionally refer a client to another real estate broker for services. For certain referrals, he will personally receive a referral fee in his capacity as a licensed real estate broker according to customary business practice in the real estate community and as a member of the Multiple Listing Service (MLS). This presents a conflict of interest to the extent it provides an incentive to Andrew J. Fama to make such referrals. Andrew J. Fama and Fama Fiduciary Wealth LLC address this conflict of interest by fully disclosing it in this brochure, by advising referred clients that they are free to use any real estate broker of their choosing, and by only making referrals when appropriate for the client.

**Material Conflicts of Interest with Other Advisers or Recommended Professionals.** We do not select other investment advisers for clients. We recommend attorneys, real estate brokers and real estate title agencies to our clients.

## **Item 11: Code of Ethics & Participation in Client Transactions**

The Firm has voluntarily subscribed to the “Real Fiduciary™ Practices” published by the Institute for the Fiduciary Standard. You can verify our affirmation of Real Fiduciary™ Practices at the Institute for the Fiduciary Standard website at: [www.thefiduciaryinstitute.org](http://www.thefiduciaryinstitute.org) under the Real Fiduciary™ Practices Advisory Registry or at our Firm website: [www.famawealth.com](http://www.famawealth.com).

**Item 11 (a): Code of Ethics:** The Firm has adopted the Code of Ethics and Standard of Professional Conduct of the CFA Institute which establishes standards of business conduct for all supervised persons of the firm. The Code of Ethics is designed for the following purposes: To put the interests of clients before the interests of the firm or the personal interests of any of the firm’s supervised persons; to prevent improper personal trading; to identify conflicts of interest; and to provide a means to resolve any actual or potential conflicts in favor of clients of the firm. A copy of the firm’s Code of Ethics is available upon request.

**Item 11(b): Participation or Interest in Client Transactions:** We do not recommend to clients any securities in which the Firm or any related person has a material financial interest. We do not act as principal in any securities transactions with our clients.

**Item 11 (c): Personal Trading by Associated Persons:** Related persons of the Firm are permitted to purchase the same securities that are recommended to clients. We generally recommend open-end mutual funds or exchange traded funds (ETFs) for our clients' portfolios. We have an ethical obligation to ensure that a related person does not receive a preferential price with respect to a security which a client is selling or purchasing at or about the same time. Any related person of the firm seeks to ensure that they do not personally benefit from the short-term market effects of their recommendations to clients. Related persons are aware of the rules regarding material non-public information and insider trading. Related persons can buy or sell specific securities for their accounts based on personal investment considerations that are not deemed appropriate for clients.

To mitigate the potential for receiving preferential pricing for a trade in an ETF or other security which trades intra-day, the purchase or sale of such a security on any trading day will be placed first in a client's account, unless the decision to trade in the client's account was made after the trade in the account of the related person. Mutual funds do not trade intra-day and the purchase or sale of a mutual fund by a related person does not present a potential opportunity for preferential pricing. Mutual funds are priced once each day after their net asset value is calculated following the close of trading.

**Item 11 (d): Conflicts of Interest with Personal Trading by Associated Persons:** (see Item 11(c) above.

## **Item 12: Brokerage Practices**

The Firm considers several factors when recommending a custodial broker-dealer for client transactions and determining the reasonableness of such custodial broker-dealer's compensation. Such factors include the custodial broker-dealer's industry reputation and financial stability, service quality and responsiveness, execution price, speed and accuracy, reporting abilities, and general expertise. Assessing these factors as a whole allows the Firm to fulfill its duty to seek best execution for its clients' securities transactions. However, the Firm does not guarantee that the custodial broker-dealer recommended for client transactions will necessarily provide the best possible price, as price is not the sole factor considered when seeking best execution. After considering the factors above, the Firm recommends the Institutional Wealth Services platform of Fidelity Investments ("Fidelity") as the custodial broker-dealer for client accounts.

Fidelity generally does not charge separately for custody services but is compensated by charging the client commissions or other fees on trades that it executes or that settle into the client's Fidelity account. Certain trades (for example, some mutual funds and ETFs) do not incur Fidelity commissions or transaction fees. Fidelity is also compensated by earning interest on the un-invested cash in the client account in Fidelity money market or cash reserves accounts.

The Firm does not receive research and other soft dollar benefits in connection with client securities transactions, which are known as "soft dollar benefits". However, the custodial broker-dealer(s) recommended by the Firm do provide certain products and services that are intended to directly benefit the Firm, clients, or both. Such products and services include (a) an online platform through which the Firm can monitor and review client accounts, (b) access to

proprietary technology that allows for order entry, (c) duplicate statements for client accounts and confirmations for client transactions, (d) invitations to the custodial broker-dealer(s)' educational conferences, (e) practice management consulting (either provided directly or through a discounted vendor relationship), (f) fee debiting technology, and (g) occasional business meals and entertainment. The receipt of these products and services creates a conflict of interest to the extent it causes the Firm to recommend Fidelity as opposed to a comparable broker-dealer. The Firm addresses this conflict of interest by fully disclosing it in this brochure, evaluating Fidelity based on the value and quality of its services as realized by clients, and by periodically evaluating alternative broker-dealers to recommend.

The Firm does not consider, in selecting or recommending custodial broker-dealers, whether the Firm or a related person receives client referrals from a custodial broker-dealer or third-party.

The Firm does not routinely recommend, request, or require that a client direct the Firm to execute transactions through a specified custodial broker-dealer other than Fidelity. If a client requests or requires that the Firm use a custodial broker-dealer other than Fidelity to effect transactions, the Firm may not be able to honor such request or requirement.

The Firm generally does not aggregate or bunch transactions since it primarily utilizes mutual funds in client accounts, all of which strike the same net asset value at the end of each day the market is open.

### **Item 13: Review of Accounts**

Client accounts are reviewed periodically with clients but not less than annually. Reviews include, when warranted, recommended changes to the investment or financial plan, and changes to the asset allocation and investment selection. The performance of client accounts is monitored more frequently.

Statements are generated no less than quarterly by our custodian and are sent directly to the client. The statements list the account positions, activity over the covered period and other related information. The custodian also sends confirmations after each account transaction is made unless confirmations have been waived by the client.

The Firm provides performance or position reports to clients at various times. Clients are urged to compare all reports we send to them against the account statements received from the qualified custodian.

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

We are not paid referral fees to refer clients to a custodian or broker-dealer. However, as set forth in Item 12, "Brokerage Practices", we receive some benefits from our clients' custodians as a result of client assets being directed to such custodians or broker-dealers. While our recommendation for the use of such custodians creates a potential conflict of interest, we believe that our recommendations are in the best interests of our clients and are not based on benefits available to us. Specifically, the availability of Fidelity's products and services is not based on us giving any particular investment advice. We do not pay referral fees to third parties.

The Firm and related parties refer clients to other professionals, including attorneys, accountants, insurance agents and real estate agents. The Firm (the LLC) does not receive anything of value

from these professionals for referring the client. The client engages the professional directly and not through the Firm. Any actual or perceived conflict of interest will be disclosed to the client. Andrew J. Fama, individually, is a “management person” and is permitted to receive referral fees or other compensation from another professional. Please read Item 10 entitled “*Other Financial Industry Activities and Affiliations*”.

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## **Item 15: Custody**

We do not maintain custody of client assets. Custody of client assets is with an independent and unaffiliated qualified third-party custodian. Under SEC regulations, we are deemed to have limited custody of a client’s assets if, for example, the client authorizes us to instruct the custodian to deduct our advisory fees directly from the client’s account or if the client grants us authority to move the client’s money to another person’s account. The custodian maintains actual custody of the client’s assets. The client receives account statements directly from the custodian at least quarterly. The statements are sent to the email or postal mailing address the client provides to the custodian. The client should carefully and promptly review the statements when they are received. The client should also compare the custodian’s account statements with any periodic reports received from the Firm.

## **Item 16: Investment Discretion**

**Discretionary Authority.** The client gives us written authorization to provide discretionary management of their accounts. Discretionary authority means that we have the authority to determine the securities to be bought or sold and the amount of the securities to be bought or sold *without obtaining specific client consent*. The term “securities” includes (but is not limited to) mutual funds, exchange-traded funds, individual equities, individual bonds or any other financial instrument. Clients have the option to place reasonable restrictions on investments to be held in the portfolio provided such restrictions are provided in writing.

## **Item 17: Voting Client Securities**

We do not have the authority to vote proxies solicited by or with respect to the issuers of securities held in client accounts. Please contact us with questions pertaining to proxy solicitations. Proxies are to be sent to the client by the custodian and are not sent to us.

## **Item 18: Financial Information**

We do not require or solicit prepayment of fees more than six months in advance. Neither Andrew J. Fama nor Fama Fiduciary Wealth LLC has been the subject of a bankruptcy petition at any time during the past ten years or at any time.

## **Privacy Policy**

We share a commitment to protect a client's privacy and confidential personal and financial information. Our privacy promise stems from the basic principles of trust, ethics, and integrity.

We collect information that:

- Helps serve a client's financial needs
- Provides high standards of client service
- Assists in developing and offering new services to clients and prospective clients
- Fulfills legal and regulatory requirements.

We will not share this information except as follows:

- Information provided on account applications and related regulatory forms---for example, name, address, Social Security number, date of birth and annual income
- Information pertaining to your relationship with us such as investments bought or sold or account balances and statements, obtained during telephone or internet transactions or from data gathering software used when you access our website.

We limit how, and with whom, we share client information. We do not sell client lists. We do not disclose client information to marketing companies.

We share and exchange information with companies engaged to work with us, such as third-party custodians, third-party administrators and vendors hired to effect, administer or enforce a transaction requested by a client. We share and exchange information with companies who develop or maintain performance-reporting software using account information and data.

We deliver our full Privacy Promise to clients each year as required by law by asking the client to review, initial and date the Privacy Promise.