

Item 1 – Cover Page

Ball & Company

A Registered Investment Adviser

1000 Newbury Road, Suite 205

Thousand Oaks, CA 91320

(805) 376-2779

www.BallandCompany.com

January 1, 2019

This Brochure provides information about the qualifications and business practices of Ball & Company. If you have any questions about the contents of this Brochure, please contact Cindy Ball at (805) 376-2779. 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.

Ball & Company is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Ball & Company also is available on the SEC's website at www.adviserinfo.sec.gov. The firm's CRD# is 133950.

Item 2 – Material Changes

This item discusses only the material changes that have occurred since Ball & Company's last annual update dated January 1, 2018. Ball & Company has had the following material changes:

The firm has changed its name from Reed & Ball to Ball & Company.

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Item 4 – Advisory Business

Ball & Company provides financial planning, consulting, and investment management services. Prior to engaging Ball & Company to provide any of the foregoing investment advisory services, the client is required to enter into one or more written agreements with Ball & Company setting forth the terms and conditions under which Ball & Company renders its services (collectively the “Agreement”).

Ball & Company has been in business as an SEC registered investment adviser since September 19, 2007. The firm was formerly known as Reed & Ball. Jason L. Ball is the principal owner of Ball & Company. As of December 31, 2018, the firm has \$151,074,847 of assets under management, all of which are managed on a discretionary basis.

This Disclosure Brochure describes the business of Ball & Company. Certain sections will also describe the activities of *Supervised Person*. Supervised Persons are any of Ball & Company’s officers, (or other persons occupying a similar status or performing similar functions), or employees, or any other person who provides investment advice on Ball & Company’s behalf and is subject to Ball & Company’s supervision or control.

This Disclosure Brochure contains all material conflicts of interest that the firm believes reasonably can impair it in rendering objective advice.

Ball & Company typically begins a client engagement with the Financial Planning and Consulting Services before beginning the Investment Management service. Currently Ball & Company is only accepting new clients willing to work with them in a full wealth management capacity; which includes both the financial planning and investment management services.

Financial Planning and Consulting Services

Ball & Company may provide its clients with broad range of comprehensive wealth management and consulting services. These services include business planning, investment, insurance, retirement, education, estate planning, and tax and cash flow needs of the client.

In performing its service, Ball & Company is not required to verify any information received from the client from the client’s other professionals (e.g., attorney, accountant, etc.) and is expressly authorized to rely on such information as provided. Ball & Company may recommend the services of itself to implement its recommendations. Clients are advised that a conflict of interest exists if Ball & Company recommends its own services. The client is under no obligation to act upon any of the recommendations made by Ball & Company under a financial planning or consulting engagement or to engage the services of any such recommended professional, including Ball & Company itself. The client retains absolute discretion over all such implementation decision and is free to accept or reject any of Ball & Company’s recommendations. Clients are advised that it remains their responsibility to promptly notify Ball & Company if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluation, or revising Ball & Company’s previous recommendations and or/services.

Investment Management Services

Clients can engage Ball & Company to manage all or a portion of their assets on a discretionary basis.

Ball & Company primarily allocates clients' investment management assets among mutual funds, exchange-traded funds ("ETF's"), structured notes, individual debt and equity securities and/or options as well as the securities components of variable annuities and variable life insurance contracts in accordance with the investment objectives of the client. Ball & Company also provides advice about any type of investment held in clients' portfolios.

Ball & Company also may render investment management services to clients relative to variable life/annuity products that they own, their individual employer-sponsored retirement plans, or other products that are not held by the client's primary custodian. In so doing, Ball & Company either directs or recommends the allocation of client assets among the various investment options that are available with the product.

Client assets are maintained at the specific insurance company or custodian designated by the product. Ball & Company tailors its advisory services to the individual needs of clients. Ball & Company consults with the clients initially and on an ongoing basis to determine time horizon and other factors that may impact the clients' investment needs. Ball & Company ensures that clients' investments are suitable for their investment needs, goals and objectives.

Clients are advised to promptly notify Ball & Company if there are changes in their financial situation or investment objectives or if they wish to impose reasonable restrictions on the management of their account (e.g., require that a portion of their assets be invested in socially responsible funds) if, in Ball & Company's sole discretion, the conditions will not materially impact the performance of a portfolio strategy or prove overly burdensome to its management efforts.

Item 5 – Fees and Compensation

Ball & Company offers its services on a fee basis, which include hourly and/or fixed fees, as well as fees based upon assets under management.

Financial Planning and Consulting Fees

Ball & Company charges a fixed fee and/or hourly fee for financial planning and consulting services. These fees are negotiable, but generally range from \$3,500 to \$10,000 on a fixed fee basis and/or from \$200 to \$250 on an hourly rate basis, depending upon the level of scope of the services and the professional rendering the financial planning and/or the consulting services. In addition, Ball & Company quarterly fee for investment management services, as described below, include ongoing financial planning and consulting services if the assets under management for the clients are greater than \$1,000,000.

Prior to engaging Ball & Company to provide financial planning and/or consulting services, the client is required to enter in to a written agreement with Ball & Company setting forth the terms and conditions of the engagement. Generally, Ball & Company requires one-half of the financial planning/consulting fee (estimated hourly or fixed)

payable upon entering the written agreement. The balance is generally due upon delivery of the financial plan or completion of the agreed upon services.

Investment Management Fee

Ball & Company provides investment management services for a quarterly fee based upon a percentage of the market value of the assets being managed by Ball & Company. Ball & Company's quarterly fee is exclusive of, and in addition to brokerage commissions, transaction fees, and other related costs and expenses which are incurred by the client. Ball & Company does not, however, receive any portion of these commissions, fees, and costs. Ball & Company's quarterly fee is charged quarterly, in advance, using the average daily balance of the assets being managed by Ball & Company. The quarterly fee varies depending upon the market value of the assets under management and the type of investment management services to be rendered, as follows:

<u>Portfolio Value</u>	<u>Quarterly Fee</u>
\$10,000,000 and Above	negotiable
\$9,000,000 - \$9,999,999	0.125%
\$8,000,000 - \$8,999,999	0.138%
\$7,000,000 - \$7,999,999	0.150%
\$6,000,000 - \$6,999,999	0.163%
\$5,000,000 - \$5,999,999	0.175%
\$4,000,000 - \$4,999,999	0.188%
\$3,000,000 - \$3,999,999	0.200%
\$2,000,000 - \$2,999,999	0.213%
\$1,000,000 - \$1,999,999	0.225%
\$500,000 - \$999,999	0.313%
Under \$499,999	0.375%

Lower Fees for comparable services may be available from other sources.

As further discussed in response to Item 7 (below), Ball & Company generally imposes a minimum portfolio value for its investment management services. In the event Ball & Company accepts accounts below the minimum portfolio value, Ball & Company's quarterly fee will be 0.375%. Ball & Company in its sole discretion, may negotiate to charge a lesser management fee based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be

managed, related accounts, account composition, pre-existing client, account retention, *pro bono* activities, etc.)

Fees Charged by Financial Institutions

As further discussed in response to Item 12 (below), Ball & Company generally recommends that clients utilize the brokerage and clearing services of Fidelity Institutional Wealth Services (“Fidelity”) for investment management accounts.

Ball & Company will only implement its investment management recommendations after the client has arranged for and furnished Ball & Company with all information and authorization regarding accounts with appropriate financial institution. Financial institutions include, but are not limited to, *Fidelity*, any other broker-dealer recommended by Ball & Company, broker-dealer directed by the client, trust and companies, banks etc. (collectively referred to herein as the “Financial Institutions”).

Clients may incur certain charges imposed by the Financial Institutions and other third parties, such as custodial fees, charges imposed directly by a mutual fund or investments such as ETFs in the account, which are disclosed in the fund’s prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on the brokerage accounts and securities transactions. Additionally, for assets outside of any wrap fee programs, clients may incur brokerage commissions and transaction fees. Such charges, fees and commissions are exclusive of and in addition to Ball & Company’s fee.

Ball & Company’s Agreement and the separate agreement with any Financial institutions typically authorizes Ball & Company to debit the client’s account for the amount of Ball & Company’s fee and to directly remit that management fee to Ball & Company. Any Financial Institutions recommended by Ball & Company have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid directly to Ball & Company.

Fees for Management During Partial Quarters of Service

For initial period of investment management services, the fees are calculated on a pro rata basis.

The Agreement between Ball & Company and the client will continue in effect until terminated by either party pursuant to the terms of the Agreement. Ball & Company’s fee are prorated through the date of termination and any remaining balance is charged or refunded to the client, as appropriate.

Clients may make additions to and withdrawals from their account at any time, subject to Ball & Company’s right to terminate an account. Additions may be in cash or securities provided that Ball & Company reserves the right to terminate an account. Additions may be in cash or securities provided that Ball & Company reserves the right to liquidate any transferred securities or decline to accept particular securities into a client’s account. Clients may withdraw account assets on notice to Ball & Company, subject to the usual and customary securities settlement procedures. However, Ball & Company designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client’s investment objectives. Ball & Company may

consult with its clients about the options and ramifications of transferring securities. However, clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

If assets are deposited into or withdrawn from an account after the inception of a quarter, the fee payable with respect to such assets will not be prorated.

Item 6 – Performance-Based Fees and Side-by-Side Management

Ball & Company does not provide any services for performance-based fees. Performance-based fees are those based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7 – Types of Clients

Ball & Company provides its services to individuals (including high net worth individuals), corporations and other business entities.

Minimum Account Size

As a condition for starting and maintaining relationship, Ball & Company generally imposes a minimum portfolio size of \$1,000,000. Ball & Company, in its sole discretion, may accept clients with smaller portfolios based upon certain criteria including anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, and *pro bono* activities. Ball & Company may aggregate the portfolios of family members to meet the minimum portfolio size, but is not required to do so.

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

Methods of Analysis

Ball & Company's primary methods of analysis are fundamental, technical and cyclical analysis.

Fundamental analysis involves the fundamental financial condition and competitive position of a company. Ball & Company will analyze the financial condition, capabilities of management, earnings, new products and services, as well as the company's markets and position amongst competitors in order to determine the recommendations made to clients. The primary risk in using fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.

Technical analysis involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis involves the use of charts to identify market patterns and trends which are based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting the historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that Ball & Company will be able to accurately predict such a reoccurrence.

Cyclical analysis is similar to technical analysis in that it involves the analysis of market conditions at a macro (entirely market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that Ball & Company is recommending. The risks with cyclical analysis are similar to those of technical analysis.

Investment Strategies

Financial Planning

Ball & Company believes that successful wealth management can only be accomplished through the implementation of a comprehensive financial plan. How wealth is structured can have a greater impact on net returns than any single investment decision.

Ball & Company's utilizes the following steps when providing financial planning services to its clients:

- *Establishing and defining the relationships* – Ball & Company believes it is important to define the client's goals and the manner in which Ball & Company and will work with the client to achieve those goals;
- *Discovering and gathering client data* – A thorough review of client information (past and present) is conducted in order for Ball & Company to gain a better understanding of each client's current financial situation;
- *Organizing and analyzing the client's financial condition* – A meticulous evaluation is performed, weighing past and current activities relative to future goals;
- *Developing and presenting financial planning recommendations and alternatives* – Various techniques and alternative solutions are explored. Multiple options are developed and integrated into a comprehensive plan that focuses on client needs and objectives;
- *Implementing the financial planning recommendations* – Using the assistance of other professionals as needed, Ball & Company coordinates the activities necessary to execute the plan. A plan without proper implementation has no value;
- *Monitoring the financial planning recommendations* – Ongoing reviews are essential for plan success. Regularly scheduled updates measure investment performance and determine how revisions in tax law or fluctuations in the general economic environment might impact the plan. These external valuables along with changes in a client's personal circumstances must all be examined.

Investment Management

When providing investment management services to its clients, Ball & Company follows the belief that a dynamic market requires a flexible strategy that measures and

responds well to risk. Ball & Company implements strategies intended to build and maintain client wealth throughout various market cycles.

In addition, Ball & Company believes that successful investors:

- Follow a well-defined investment strategy;
- Tend to be value oriented and disciplined in their approach to investing;
- Can quickly adapt to changing markets;
- Base their investment decisions on both fundamental and technical analysis;
- Have the freedom and flexibility to invest wherever they see opportunity;
- View their returns in relation to the amount of risk taken;
- Do not base success upon a single benchmark or index, but rather consider the portfolio relative to stated goals and objectives; and
- Utilize a broadly diversified list of asset classes and investment sectors.

Risk of Loss

General Risk of Loss

Investing in securities involves the risk of loss. Clients should be prepared to bear such loss.

Market Risks

All securities, particularly individual equity and debt securities, are subject to market volatility, economic factors and certain other market risks. The success of an investment may depend to a great extent upon correctly assessing the future course of price movements of investments. There can be no assurance that Ball & Company will be able to predict those price movements accurately.

Mutual Funds and ETFs

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The

trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or a discount to NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed-based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

Options

Options allow investors to buy or sell a security at a contracted "strike" price (not necessarily the current market price) at or within a specific period of time. Clients may pay or collect a premium for buying or selling an option. Investors transact in options to either hedge (limit) losses in an attempt to reduce risk or to speculate on the performance of the underlying securities. Options transactions contain a number of inherent risks, including the partial or total loss of principal in the event that the value of the underlying security or index does not increase/decrease to the level of the respective strike price. Holders of options contracts are also subject to default by the option writer which may be unwilling or unable to perform its contractual obligations.

Hedge Funds:

We may utilize individual hedge funds with a singular manager and single strategy, or a fund of hedge funds that provides investors access to a group of hedge fund managers with various strategies. The main investing strategies focus on: Equity Long/Short, Global Macro, Equity Market Neutral and Fixed Income Relative Value.

- Equity long/short strategies seek to balance risk and return by taking both long and short positions in stocks, stock options and futures.
- Global macro strategies look for volatility created by economic, political and market trends and take long and short positions in any type of security, including equities, fixed income, currencies and commodities.
- Equity Market Neutral manager may make systematic predictions of relative stock performance based on a number of fundamental and technical signals.
- Fixed income relative value managers attempt to exploit mispricing among fixed income securities.

Item 9 – Disciplinary Information

Ball & Company is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management. Ball & Company does not have any required disclosures to this item.

Item 10 – Other Financial Industry Activities and Affiliations

Ball & Company is required to disclose any relationships or arrangement that is material to its advisory business or to its clients with certain related persons. Ball & Company has described such relationships and arrangements below.

Registration as Insurance Agency

Ball & Company is a duly licensed insurance agency. Additionally, certain of Ball & Company's *Supervised Persons*, in their individual capacities, are licensed insurance agents with various insurance companies, and in such capacity, recommend, on a fully-disclosed basis, the purchase of certain insurance products. A conflict of interest exists to the extent that Ball & Company or its *Supervised Persons* recommend the purchase of insurance products where Ball & Company or its *Supervised Persons* receive insurance commissions or other additional compensation.

Item 11 – Code of Ethics

Ball & Company and persons associated with Ball & Company ("Associated Persons") are permitted to buy or sell securities that it also recommends to clients consistent with Ball & Company's policies and procedures.

Ball & Company has adopted a code of ethics ("Code of Ethics") made up of its personal securities transaction and insider trading policies and procedures. When Ball & Company is purchasing or considering for purchase any security on behalf of a client, no *Covered Person* (as defined below) may affect a transaction in that security prior to the completion of the purchase or until a decision has been made not to purchase such security. Similarly, when Ball & Company is selling or considering the sale of any security on behalf of a client, no *Covered Person* may effect a transaction in that security prior to the completion of the sale or until a decision has been made not to sell such security.

Unless specifically defined in Ball & Company's procedures (summarized above), neither Ball & Company nor any of Ball & Company's Associated Persons may effect for himself or herself, for an Associated Person's immediate family (i.e., spouse, minor children, and adults living in the same household as the Associated Person), or for trusts for which the Associated Person serves as a trustee or in which the Associated Person has a beneficial interest (collectively "*Covered Persons*"), any transactions in a security which is being actively purchased or sold, or is being considered for purchase or sale, on behalf of any of Ball & Company's clients.

The foregoing policies and procedures are not applicable to (a) transactions effected in any account over which neither Ball & Company nor any of its *Supervised Persons* (as defined in this Form ADV) has any direct or indirect influence or control; and (b) transactions in securities that are: direct obligations of the government of the United States; banker's acceptances, bank certificates of deposit, commercial paper, and high

quality short-term debt instruments, including repurchase agreements; or shares issued by registered open-end investment companies.

This policy has been established recognizing that some securities being considered for purchase and sale on behalf of Ball & Company's clients trade in sufficiently broad markets to permit transactions by clients to be completed without any appreciable impact on the markets of such securities. Under certain limited circumstances, exceptions may be made to the policies stated above. Ball & Company will maintain records of these trades, including the reasons for any exceptions.

Ball & Company also maintains and enforces written policies reasonably designed to prevent the unlawful use of material non-public information by Ball & Company or any of its *Supervised Persons*.

Clients and prospective clients may contact Ball & Company to request a copy of its *Code of Ethics*.

Item 12 – Brokerage Practices

As discussed above, in Item 5, Ball & Company generally recommends that clients utilize the brokerage and clearing services of *Fidelity*.

Factors which Ball & Company considers in recommending Fidelity or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. The commissions and/or transaction fees charged by Fidelity may be higher or lower than those charged by other Financial Institutions.

The commissions paid by Ball & Company's clients comply with Ball & Company's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction where Ball & Company determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Ball & Company seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

Ball & Company periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institution in light of its duty to obtain best execution.

The client may direct Ball & Company in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution, and Ball & Company will not seek better execution services or prices from other Financial Institutions or be able to "batch" client transactions for execution through other Financial Institutions with orders for other accounts managed by Ball & Company (as described below). As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, Ball & Company

may decline a client's request to direct brokerage if, in Ball & Company's sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Transactions for each client generally will be effected independently, unless Ball & Company decides to purchase or sell the same securities for several clients at approximately the same time. Ball & Company may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among Ball & Company's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will generally take averaged as to price and allocated among Ball & Company's clients pro rata to the purchase and sale orders place for each client on any given day. To the extent that Ball & Company determines to aggregate client orders for the purchase or sale of securities, including securities in which Ball & Company's Supervised Persons may invest, Ball & Company generally does so in accordance with applicable rules and no-action guidance. Ball & Company does not receive any additional compensation or remuneration as a result of no-action guidance. In the event that Ball & Company determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other account; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, share may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a *de minimis* allocation in one or more account, Ball & Company may be exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vii) in cases where a small proportion or an order is executed in all account, share may be allocated to one or more accounts on a random basis.

Consistent with obtaining best execution, brokerage transactions may be redirected to certain broker dealers in return for investment research products and/or services which assist Ball & Company in its investment decision-making process. Such research generally will be used to service all of Ball & Company's clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because Ball & Company does not have to produce or pay for the products or services. Ball & Company has an arrangement with National Financial Services LLC and Fidelity Brokerage Services LLC (collectively, and together with all affiliates, "Fidelity") through which Fidelity provides Ball & Company in

managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade orders for multiple client accounts; (iii) provide research, pricing and other market data, (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Fidelity also offers other services intended to help Ball & Company manage and further develop its advisory practice. Such services include, but are not limited to, performance reporting, financial planning, contact management systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom Ball & Company may contract directly.

Ball & Company is independently operated and owned and is not affiliated with Fidelity.

Fidelity generally does not charge its advisor clients separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Fidelity or that settle in Fidelity accounts (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity provides access to many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges.

Item 13 – Review of Accounts

For those clients whom Ball & Company provides investment management services, Ball & Company monitors those portfolios as part of an ongoing process. Such reviews are conducted by the Wealth Advisors of Ball & Company, Jason Ball and Miranda Eisele. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with Ball & Company and to keep Ball & Company informed of any changes thereto. Ball & Company contacts ongoing investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Unless otherwise agreed upon, clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer or custodian for the client accounts. Those clients to whom Ball & Company provides investment advisory services will have access to such relevant account and/or market-related information such as an inventory of account holdings and account performance on a quarterly basis.

Item 14 – Client Referrals and Other Compensation

Ball & Company is required to disclose any relationship or arrangement where it receives an economic benefit from a third party (non-client) for providing advisory services. In addition, Ball & Company is required to disclose any direct or indirect compensation that it provides for client referrals. Ball & Company has disclosed its additional compensation as a result of insurance sales in Item 10 above.

Item 15 – Custody

Ball & Company's *Agreement* and/or the separate agreement with any *Financial Institution* typically authorizes Ball & Company through such *Financial Institution* to debit the client's account for the amount of Ball & Company's fee and to directly remit that management fee to Ball & Company in accordance with applicable custody rules.

The *Financial Institution* recommended by Ball & Company have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid directly to Ball & Company. Clients should carefully review the statements sent directly by the *Financial Institutions* and compare them to those received from Ball & Company. If you are not receiving at least quarterly custodial account statements, please contact us at the number on the cover page of this brochure.

Item 16 – Investment Discretion

Ball & Company may be given the authority to exercise discretion on behalf of clients. Ball & Company is considered to exercise investment discretion over a client's account if it can effect transactions for the client without first having to seek the client's consent. Ball & Company is given this authority through a power-of-attorney included in the agreement between Ball & Company and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold).

Ball & Company takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold; and
- When transactions are made.

Item 17 – Voting Client Securities

Ball & Company is required to disclose if it accepts authority to vote client securities. Ball & Company does not vote client securities on behalf of its clients. Clients receive proxies directly from the *Financial Institutions*.

Item 18 – Financial Information

Ball & Company does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance. In addition, Ball & Company is required to disclose any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. Ball & Company has no disclosures pursuant to this Item.