

## OLD MISSION INVESTMENT COMPANY, LLC

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FORM ADV - PART 2A  
Disclosure Brochure

March 26, 2019

This brochure provides information about the qualifications and business practices of Old Mission Investment Company ("Old Mission"). If you have any questions about the contents of this brochure, please contact us at (231) 929-4100. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about Old Mission Investment Company LLC, including a copy of its Form ADV Part 1, is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 Material Changes**

The S.E.C. issued a final rule in July 2010 requiring investment advisors to provide a Firm Brochure in narrative "plain English" format. This new final rule identifies sections of an advisor's business which needs to be discussed. This narrative brochure of our form ADV Part 2 reflects the final rule.

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Since the filing of our last annual updating amendment dated March 20, 2018, we have no material changes to report.

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## Item 4 Advisory Business

Firm Description: Old Mission Investment Company LLC was founded in 2006 based on the efforts of 6 individual principals following their departure from a national investment and brokerage firm. Old Mission Investment Company is considered to be a fee-based investment advisory firm.

As an independent investment advisory firm, Old Mission Investment Company does not offer proprietary products of its own. We provide investment management services to a variety of clients including, but not limited to trusts, individuals, retirement plans, pension plans by managing portfolios of mutual funds, exchange traded funds, individual stocks and individual bonds. We work closely with clients to formulate financial, estate, and investment plans that emphasize focusing on their entire financial picture, rather than solely on investment management needs. Each portfolio is structured to meet the needs of the client through careful risk profiling in order to meet the safety, liquidity, growth or income needs of our client.

At present, Old Mission Investment Company has 4 principal members, with all members participating in the investment management, and overall management of the firm.

### *Types of Advisory Services:*

Old Mission Investment Company works with clients' investment portfolios with specific investment objectives. Each client provides a summary risk profile detailing their risk preference on a short-term, intermediate term, and long-term basis. Each client portfolio is customized based on their overall needs. We may utilize individual securities such as individual stocks, taxable or tax-free municipal bonds, no-load or load waived mutual funds or exchange traded funds to meet their objectives.

Customized Relationships: Old Mission Investment Company makes every effort to create a customized investment solution for each client relationship. This may take the form of retaining certain assets for tax purposes, holding additional amounts of cash based on goal-based needs, or their preference toward risk on both a short-term and intermediate-term basis. During our initial meeting, we may make every effort to obtain tax records, personal financial summaries, and past investment histories in efforts to create a personalized investment plan for the client.

Old Mission Investment Company prefers to manage investment accounts on a discretionary basis. However, there are times where the individual client may engage our firm on a non-discretionary basis, giving them greater control over the investments placed within their accounts. Where clients may prefer a non-discretionary investment management arrangement, we may still use portfolios recommended by our firm with the client retaining final decision making authority concerning whether the recommended trades are placed within their account. The majority of Old Mission Investment Company client accounts have granted discretionary investment management authority of their accounts.

For clients granting Old Mission Investment Company discretionary authority, we are responsible for major investment decisions, including but not limited to the following: the security to be purchased or sold, the amount to be bought or sold, and the brokerage firm used to execute the transaction. Asset allocation decisions for each client are the primary factor in determining the amount of each transaction on behalf of the clients' account. While we expect to use mutual funds as a primary investment vehicle, in transactions involving individual securities we strive to select a broker dealer based on best execution, service, accuracy and transaction fees.

### *Wrap Fee Programs:*

Old Mission Investment Company does not participate in any wrap fee programs with another custodian or investment manager.

### *Managed Assets:*

Old Mission Investment Company has the following assets under management as of December 28, 2018:

Discretionary Basis: \$374,582,000

Non-Discretionary Basis: \$35,500,100

Total Assets under Management: \$410,082,100

## **Item 5 Fees and Compensation**

### *Description*

As a fee-based investment advisory firm, Old Mission Investment Company provides clients with fee-based investment solutions that provide transparency with respect to our compensation. Clients are billed on an asset-based fee structure that can be as low as .25% to as high as 1.75% of the assets under our management. Advisory fees are assessed on the total value of the portfolios we manage, which may include cash assets such as money market accounts. Fees are negotiable based on the size and scope of the client relationship.

For clients maintaining substantial cash balances through money market accounts, we may make additional accommodations whereby a client may maintain money market assets on a non-investment basis, through an affiliated non-fee account. This is done to accommodate clients' needs for checking account services, with investment management services provided through another account.

### *Billing*

Fees are charged quarterly in advance (prior to services provided) and each invoice will be based upon the market value of the portfolio, set forth by the custodian, as of the last market day of the relevant calendar month. Clients may pay fees separately by check or may have fees debited from their account by signing an investment advisory agreement or new account paperwork from the custodian permitting this action. For clients seeking to engage Old Mission Investment Company for financial planning or consultation services may be billed for these services at a rate between \$150 and \$275 per hour depending on the complexity and scope of the project. Additionally, clients may engage Old Mission Investment Company on a 'project basis' with fees ranging from \$500 to \$10,000.

### *Other Fees*

Fidelity Investments ("Fidelity") is the principal investment custodian for our clients' accounts and does not charge an annual custodial fee for this service. Fidelity is compensated through transaction fees generated through trading initiated by our firm, fees charged for wire transfers from client accounts, and margin interest charged to clients who wish to borrow against their portfolios. Fidelity may also receive a portion of the advisory fees charged by the money market funds, mutual funds, or exchange traded funds held within client accounts. Clients of Old Mission Investment Company will incur the following charges:

Quarterly fees paid to Old Mission Investment Company (between .25% and 1.75% annually of assets under management), commissions or transaction charges paid to Fidelity to purchase or sell individual securities or mutual funds, and fees to fund managers for ongoing management of mutual funds, money market funds, and exchanged traded funds.

The fees paid to Old Mission Investment Company as well as the fees paid to Fidelity Investments for advisory and transaction purposes, respectively, are disclosed on all client statements from our custodian. Underlying mutual fund expenses, referred to as 'internal operating expenses', may be deducted on a daily basis from mutual fund assets and are generally not visible to clients. This information is available through a fund's prospectus, or upon request to our firm.

#### *Compensation for Sales of Investment Products or Services*

Old Mission Investment Company does not receive any compensation for the sale of any security or investment product recommended or purchased for its clients.

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

Old Mission Investment Company does not charge any performance-based fees. All fees are disclosed above.

### **Item 7 Types of Clients/Minimum Account Size**

Old Mission Investment Company provides financial planning, consulting, and investment management services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and business entities. We do not enforce a minimum account size for our client relationships; however, we place a high value on relationships that retain the services of our firm on a comprehensive basis. Clients with specific needs such as alternative investments or separate account managers may have to meet the needs of the outside advisor separate from the requirement of Old Mission Investment Company. This is evaluated on a case-by-case basis. Presently, Old Mission Investment Company serves clients, families, and institutions with the majority of portfolios ranging from \$100,000 to \$50,000,000.

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

#### *Methods of Analysis*

Old Mission Investment Company utilizes fundamental analysis in the formulation of client portfolios and investment models for client accounts. We rely upon information obtained from a variety of different sources including, but not limited to, Morningstar, Zack's Investment Research, Goldman Sachs, and other research prepared by others.

#### *Investment Strategies*

Old Mission Investment Company generally utilizes investments made across a variety of different assets classes, such as domestic large company and small company stocks, international stocks, fixed income, convertible securities and alternative asset classes. Asset allocation is an important part of each portfolio, with each portfolio allocation driven by the clients' tolerance for risk, the investor's time horizon, and need for income. We do utilize a model portfolio strategy, providing for similar securities

for each portfolio; however, each portfolio may have characteristics that differ from one portfolio to another based on the clients' preference for maintaining certain levels of cash, or a request to exclude certain assets from the model allocation.

We presently maintain 6 model portfolio allocations for our clients, with the majority of client funds invested within non-proprietary mutual funds and/or exchange traded funds. We recommend that all clients consider a strategy that favors asset allocation and the use of mutual fund investments. We feel that mutual funds or exchanged traded funds provide clients with the best way to achieve portfolio diversification, with immediate and efficient access to a variety of different asset classes.

We prefer to advise clients that long-term investing (5 years or longer) may provide the best chance at success. We cannot, however, guarantee the effectiveness of our advice, nor can we control the outcome of any investment method, including conservative portfolio model allocations. Market conditions may dictate changes to our investment philosophy and as a result we may make occasional changes to our clients' portfolios. Even though we do not regard transactions fees as a significant charge to our client portfolios, we do advocate a low-turnover, long-term investment strategy for client accounts.

### *Risk of Loss*

As mentioned above, we cannot guarantee the accuracy of the advice we provide. Losses can occur with any investment made, or within any strategy utilized, conservative or otherwise. Clients are requested to advise our firm of any change to their personal or financial circumstance that may change their tolerance for risk and sensitivity to loss. The risk of loss within any security or investment we recommend other than government securities, is 100%.

## **Item 9 Disciplinary Information**

Old Mission Investment Company and its employees do not have any disciplinary actions to report.

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

The Investment Advisor Representatives of Old Mission Investment Company may also be Registered Representatives offering securities through: Purshe Kaplan Sterling Investments, A New York Corporation (Registered Broker Dealer, Member: NASD/SIPC). Additionally, some members of Old Mission may hold insurance licenses permitting them to sell or recommend commission-based insurance products or services to clients of Old Mission Investment Company.

The principals of Old Mission Investment Company also own Old Mission Trust Company, a privately-held independent trust company chartered under the laws of South Dakota. Old Mission Trust Company is considered an affiliate of Old Mission Investment Company. Clients of Old Mission Investment Company may be solicited by Old Mission Trust Company.

No client of Old Mission Investment Company may engage the services of Old Mission Trust Company at the same time where Old Mission Trust Company is serving as trustee. Clients who wish to engage the services of Old Mission Trust Company may do so by terminating services with the investment advisor, and engaging the services of Old Mission Trust Company. Should Old Mission Trust Company assume trustee duties for a client of Old Mission Investment Company, Old Mission Trust Company will immediately terminate the advisory relationship with Old Mission Investment Company. Investment management services provided to Old Mission Trust Company clients are done exclusively through Old Mission Trust Company, and not through Old Mission Investment Company. The employees of Old Mission Investment Company are also employees of Old Mission Trust Company, and may be

compensated by Old Mission Trust Company for referring advisory clients to Old Mission Trust Company when trust services are required. Employees and representatives of Old Mission Investment Company may work for both companies. There is a contract between the two companies that allows them to share administrative staff, equipment and other typical business resources.

Old Mission Trust Company is owned directly by the members of Old Mission Investment Company LLC and not Old Mission Investment Company. Old Mission Trust Company does not act as custodian for any assets belonging to clients of Old Mission Investment Company. Additional information about Old Mission Trust Company may be found by contacting the State of South Dakota Division of Banking.

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

### *Code of Ethics*

Old Mission Investment Company strives to maintain the highest standards of business ethics. We conduct business in a proper and legal manner and expect our employees to do the same. In most instances, the proper course of action is apparent and we follow it. Compliance with all regulation and legislation is of paramount importance to the firm and its employees as well as to the reputation of the Firm and its principles of honesty, integrity and professionalism.

Old Mission Investment Company has established a Code of Ethics which establishes standards of conduct for all personnel in our employ, protects material non-public information about our clients' transactions and requires the reporting of personal securities transactions. We offer a copy of our Code of Ethics to all clients on an annual basis and also provide a copy to each prospective client before signing our investment advisory contract.

We place our clients' interests first and foremost in all matters. In addition, all of our personnel must comply with applicable federal securities laws.

Unless express consent is given by the client:

- We never divulge conversations in any form (oral or written) between our clients and ourselves.
- We never make public any information regarding a client's wealth or holdings.

### *Participation or Interest in Client Transactions*

We may recommend to clients securities in which we or a related party has a material financial interest.

Old Mission Investment Company may, from time to time, invest in the same securities that we recommend to clients. This could result in a potential conflict of interest if we were to time the purchases in the client accounts to benefit our personal trading. Within our Code of Ethics, as it relates to Personal Trading, we restrict trading in the same securities as our clients within a reasonable time period.

From time to time, we may recommend certain securities to clients who retain discretion over their investment portfolios which we recently purchased for our personal accounts. In those cases, our Code of Ethics requires us to disclose the transactions in the personal accounts to our clients before conducting the trade in the client's account.

## Item 12 Brokerage Practices

Old Mission Investment Company does recommend that clients engage Fidelity Investments as an investment custodian, and to transact trades for their accounts. Fidelity does provide access to institutional trading and custody services not readily available to retail investors. These services are generally available to registered investment advisors on an unsolicited basis without charge to the advisor, provided the aggregate value of the advisor's clients' assets exceed \$20 million on the Fidelity Institutional Wealth Services platform. These services include brokerage, custody, research, and access to institutional share classes of mutual funds only available to investors with large initial minimum investments typically exceeding \$1 million.

Fidelity Investments also makes available other products and services that may benefit Old Mission Investment Company but may not benefit its clients' accounts. Some of these products and services aid Old Mission Investment Company in the management of client accounts. This relationship creates a conflict of interest since recommending other custodians may increase the operational costs for Old Mission Investment Company in the servicing of client accounts. These products or services may include, but are not limited to the following: research, the ability to deduct advisory fees from clients' custodial accounts, pricing information, assistance with back-office functions, discounts on periodicals or materials, fee waivers for conferences, complimentary business and compliance newsletters, and various other non-cash services.

Recommending that clients maintain accounts with Fidelity Investments may be based on benefits provided to Old Mission Investment Company from Fidelity Investments and that the decision to utilize Fidelity may be based on other factors and not just the costs or quality of the services provided to clients of Old Mission Investment Company by Fidelity Investments.

While we generally custody our clients' assets at Fidelity Investments, we are allowed to "trade away" utilizing broker dealers other than Fidelity if it is in their best interests. As a fiduciary for our clients, we attempt to obtain the best execution for each trade transacted for our clients. Best execution usually considers the underlying cost to our clients, but may also include timeliness, liquidity, accuracy and other factors.

While we prefer to have clients custody assets through Fidelity Investments, clients who ask us to manage assets at a different custodian will be permitted to do so assuming the custodian can provide a comparable level of products and services when compared to Fidelity Investments.

### *Soft Dollar Relationships*

Old Mission Investment Company does not have soft dollar arrangements as we believe these arrangements would not be in our client's best interests.

### *Directed Brokerage*

Fidelity does not provide any client referrals to Old Mission Investment Company in exchange for the recommendation for clients to utilize custodial services through Fidelity. It is our policy not to require clients to direct trades through a specific broker dealer, known as 'directed brokerage.'

## Item 13 Review of Accounts

### *Periodic Reviews*

All client accounts are reviewed on a continuous and ongoing basis. Internal reviews of portfolio assets are done on a quarterly, monthly, perhaps even daily basis by members of the Old Mission Investment Committee, in addition to the other advisory representatives of Old Mission. The Investment Committee is comprised of a two person committee that includes Christopher Lamb, as the Chief Investment Officer, in addition to Robert Stibbs as committee member. Client portfolio reviews can be conducted on an intra-month basis, upon request or appointment. Client reviews routinely include reviews of specific account performance and asset allocation, with broad-based reviews of specific security performance. We may make comparisons to specific index returns and may also reference other items such as financial plans in evaluating the goals and objectives of a client account.

Portfolio models are reviewed each day by members of the Old Mission Investment Committee. Other reviews, as mentioned above, may be done on a monthly basis to include specific fund or security performance relative to appropriate benchmarks, and a review of the asset allocation of the fund model against the target asset allocation.

### *Factors That Trigger Review*

A review may be warranted based on actions such as: client request, additional deposits to the client account, change in client risk tolerance, goals or objectives, and changes in the economic climate or expected returns of certain asset classes that may warrant changes in the overall strategy for the model portfolio or client account. Additionally, changes in clients' tax situation, or the overall tax laws may cause a specific account review.

### *Client Reports*

Clients receive standard account statements from investment sponsors and qualified brokerage firms monthly or quarterly and as transactions occur. Old Mission Investment Company prepares quarterly portfolio reports for clients. Clients are encouraged to carefully compare the information on Old Mission Investment Company reports to that on the custodian's statements.

Copies of our clients' internally generated reports are maintained at our office in an electronic format. In addition, client statements generated from Fidelity are kept in our office in electronic format and can also be accessed by clients through the custodian's website.

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

Old Mission Investment Company may compensate certain non-employee individuals and institutions for the referral of clients. These individuals and entities are referred to as "solicitors." In these situations, there will be a written agreement with the soliciting individual or organization that specifies the amount of the compensation they will receive. This compensation does not affect the fees that a client will pay and any client referred to Old Mission Investment Company by a solicitor are provided by a written disclosure with details of any compensation arrangement between Old Mission and the soliciting individual or organization prior to signing any agreement with Old Mission Investment Company. As of the date of this agreement, we presently maintain referral relationships with Charlevoix State Bank, (a Michigan-based banking institution through which Old Mission Investment Company provides services to the bank's depositors and shareholders for a referral fee), and mBank. Old Mission Trust Company also engages in referral fee arrangements, however, does not compensate Old Mission Investment Company for any referrals.

## **Item 15 Custody**

Old Mission Investment Company does not take custody of client's assets; rather, we use Fidelity Investments as the custodian. In its role as custodian, Fidelity Investments provides monthly report statements to all of our clients.

## **Item 16 Investment Discretion**

Old Mission Investment Company exercises investment discretion in the selection of securities to be bought or sold for client accounts based on clients' individual investment objectives and the analysis performed by the Old Mission Investment Company investment committee. From time to time, clients may engage the services of our firm on a discretionary basis but would like to be notified prior to any changes being made within their account. On an individual basis, clients may have investment discretion within their own account, or any other account they are authorized by the account owner or authorized person.

## **Item 17 Voting Client Securities**

Old Mission Investment Company does not vote proxies on behalf of clients. Our investment custodian, Fidelity, will forward any proxies that need to be voted to the individual account owners or their authorized individuals.

## **Item 18 Financial Information**

Old Mission Investment Company does not have any financial condition that will impair the firm from meeting contractual commitments to our clients. A balance sheet is not required to be provided because a.) Old Mission Investment Company does not serve as a custodian for client accounts, and b.) does not require prepayment of investment advisory fees of more than \$1,200 six months or more in advance.

## **Item 19 Requirements for State-Registered Advisers**

We are a federally registered investment adviser; therefore, we are not required to respond to this item.

## Item 20 Privacy Policy and Additional Information

Old Mission Investment Company as a Registered Investment Adviser is covered under the definition of a "financial institution" under the Gramm-Leach-Bliley Act, ("*The Act*") and in conjunction with the SEC's Privacy Rule ("Regulation S-P"). The Privacy Rule requires every broker, dealer, investment company, and registered investment adviser to adopt policies and procedures reasonably designed to safeguard customer records and other nonpublic consumer information.

Old Mission Investment Company utilizes information that you provide in order to provide you with the services and information you request and it is our goal to deliver the best possible service to you, while guarding against any real or perceived infringements of your rights of privacy. The types of information the Adviser may collect during the normal course of business may include: Information provided in applications, forms, and provided either verbally or in writing, and include but are not limited to your name, address, phone number, account information, social security number, employment, assets, income and debt; information about your transactions, accounts, balance information; trading activity, parties to transactions; Information from other outside sources, medical and beneficiary information (relating to insurance issues), conversations between clients and Advisory Representatives, and any other information deemed to be nonpublic personal as defined by the Act and by state privacy rules.

Old Mission Investment Company realizes that providing personal information is an act of trust and takes the issue of protecting privacy seriously. The Adviser values clients' trust and confidence and will never sell or share nonpublic personal information obtained from consumers or clients. All information provided by clients to Old Mission Investment Company and information and advice furnished by the Adviser to clients, shall be treated as confidential and shall not be disclosed to unaffiliated third parties, except as permitted by clients with written authorization, by application to facilitate the investment advisory services offered by the Adviser via an unaffiliated financial services provider, to a supervising entity (such as the Adviser's unaffiliated broker/dealer, PKS) or as required by law or by any regulatory authority to which the Adviser or its associated persons may be subject. For example, we may be required to turn over information in order to cooperate with law enforcement authorities and/or securities regulators.

Old Mission Investment Company limits access of nonpublic information to only those who require the information for the delivery of advisory or administrative services and who have been educated about and have signed an acknowledgment of our privacy policies. The Adviser's policy to protect client information extends beyond the termination of the client agreement. Additionally:

- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.
- Personally identifiable information about you will be maintained and protected during the time you are a client, and for the required time thereafter that such records required to be maintained by securities laws (5 years) and thereafter will be safely destroyed via in-house shredding or a secure shredding services.

If consumers provide the Adviser with nonpublic personal information but do not become clients, the Adviser may keep this information securely on file for up to a year before shredding in-house or via a secure shredding service, depending upon the nature of the information and the likelihood of engagement.

Clients are encouraged to discuss any questions regarding Old Mission Investment Company's privacy policies and procedures directly with Jeffrey Johnson, the Chief Compliance Officer of Old Mission Investment Company.

**Trade Errors**

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. All profits resulting from a trade error will be given to the client. All losses will be paid for by Old Mission Investment Co.

**Class Action Lawsuits**

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.