

Registered As: Convergence Financial, LLC | Doing Business as: Convergence Financial



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## **Form ADV Part 2A – Disclosure Brochure**

**Effective: June 01, 2019**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Convergence Financial (“the firm”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (573) 818-2264 or by email at [travis@convergence-financial.com](mailto:travis@convergence-financial.com). The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about the firm to assist you in determining whether to retain the firm. Additional information about Convergence Financial and its Associated Persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD No. 304146.

## **Item 2 – Material Changes**

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Convergence Financial is a newly formed registered investment advisor. This is the initial filing of the Disclosure Brochure.

Annually, a complete Disclosure Brochure will be offered to clients along with a summary of material changes, if any, within 120 days from the firm's fiscal year-end.

At any time, the current Disclosure Brochure is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching the firm name or CRD No. 304146. A copy of this Disclosure Brochure may be requested at any time, by contacting (573) 818-2264 or by email at [travis@convergence-financial.com](mailto:travis@convergence-financial.com).

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## **Item 4 – Advisory Business**

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### **Firm Information**

Convergence Financial (the “firm”) has provided brokerage services through LPL Financial LLC (LPL), a FINRA/SIPC member broker/dealer and advisory services through Good Life Advisors, LLC, an SEC registered Investment Advisor since 2016. In 2019, Convergence Financial registered as a legal entity with the state of Missouri and registered with the SEC as an investment advisor to directly offer advisory services and continues to offer brokerage services through LPL. Convergence Financial, LLC, LPL and Good Life Advisors, LLC are all separate unaffiliated legal entities.

The firm operates with three priorities:

- Investing;
- Planning; and,
- Service.

The name of the firm was created as a way to convey the “convergence” of these three priorities.

The mission is to provide independent investment advice and comprehensive financial planning to our clients and deliver this to them with consistent and personalized service that starts with setting financial goals and creating a plan followed by on-going management.

### **Executive Management Team**

#### **Founder – Travis E. Cook**

Mr. Cook is a graduate of the University of Missouri where he obtained his bachelor’s degree in Finance in 2006. Immediately upon graduation, he began his career as a Financial Advisor. During the first 10 years of his career, he worked for a Broker/Dealer and held numerous management roles with the firm. In 2016, Travis decided to join LPL Financial, LLC (LPL), a FINRA/SIPC member Broker/Dealer and founded Convergence Financial. His decision to pursue this change was driven by the desire to offer clients independent investment advice, while still holding true to the financial planning values that have always been the foundation of his work. In order to continue to grow in education, Mr. Cook obtained the following professional designations:

- CERTIFIED FINANCIAL PLANNER™ professional – CFP®
- Certified Mutual Fund Counselor designation – CMFC®

#### **Chief Compliance Officer (CCO) – Richard C. Gromis**

Richard Gromis serves in the capacity of Chief Compliance Officer as an employee of Good Life Outsourced Compliance, LLC (GLOC). GLOC is an outsourced compliance solution to provide services from a remote location using custom designed technology solutions. A member of the GLOC team is available as an on-sight resource.

Prior to becoming a GLOC employee, Mr. Gromis served as the Chief Compliance Officer for Good Life Advisors, LLC, an SEC registered investment advisor with over a Billion dollars of assets under management. He also spent 38 years in the banking industry in such positions as Senior Lender, Director, Chief Compliance Office and Chief Operations Officer as well as the Founder and President of Berkshire Bank. In addition, Mr. Gromis has been involved in numerous charitable organizations over the years. He

has held leadership positions with the Boy Scouts and Berks County (PA) Association for the Blind. Mr. Gromis has also been a Rotarian for more than 35 years and has served as Rotary Club President, Assistant District Governor and District Governor.

### **Advisory Services Offered**

Services are provided by providing regular and continuous management and supervision of assets as well as providing financial planning services. Assets are managed with a focus on investment goals, objectives, risk tolerance and financial situation. Investment portfolios primarily consist of low-cost, diversified mutual funds and/or exchange-traded funds ("ETFs") as well as individual stocks and bonds. The firm's investment strategy[ies] is primarily long-term focused, but the firm may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions.

- At no time will the firm accept or maintain custody of funds or securities. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the agreement.

### **LPL Financial (LPL) Sponsored Programs**

#### **Strategic Wealth Management (SWM I and SWM II)**

Strategic Wealth Management is the name of the custodial account offered through LPL to support investment advisory services provided by the firm. Within a SWM account, investment advisor representatives provide advice on the purchase and sale of various types of investments, such as mutual funds, exchange-traded funds ("ETFs"), variable annuity subaccounts, real estate investment trusts ("REITs"), equities, and fixed income securities. The advice is tailored to the individual needs of the client based on the investment objective chosen by the client in order to help assist clients in attempting to meet their financial goals. Accounts are reviewed on a regular basis and rebalanced as necessary according to each client's investment profile. More specific account information and acknowledgements are further detailed in the account opening documents.

Investment Advisor Representatives can offer SWM I or SWM II. The accounts offer the same investment choices and are managed in the same manner, but the fee structure is different. For SWM I, clients are charged transaction fees in addition to the advisory fee whereas for SWM II, the transactions fees are absorbed as part of the advisory fee.

- A minimum account balance is not required to open or maintain an account.

### **Wrap Fee Program**

SWM II is offered as a wrap fee program where the firm acts as the sponsor and portfolio manager.

- A wrap fee program is a comprehensive advisory account with a single fee that covers a bundle of services; such as, portfolio management, advice, and investment research as well as trade execution, custody and reporting fee.
- Please see Appendix 1 –Wrap Fee Program Brochure, which is included as a supplement to this Disclosure Brochure. The advisory fee for SWM II accounts may be higher than SWM I to account for the transaction fees.

Depending on the anticipated level of trading, investment advisor representatives of the firm will work with each client to determine the most cost-effective fee structure.

### **Retirement Plan Consulting Services**

Investment advisor representatives assist clients that are trustees or other fiduciaries to retirement plans (“Plans”) by providing fee-based consulting and/or advisory services. IARs perform one or more of the following services, as selected by the client in the client agreement:

- Assistance in the preparation or review of an investment policy statement (“IPS”) for the Plan based upon consultation with client to ascertain Plan’s investment objectives and constraints.
- Acting as a liaison between the Plan and service providers, product sponsors or vendors.
- Ongoing monitoring of investment manager(s) or investments in relation to the criteria specified in the Plan’s IPS or other written guidelines provided by the client to the IAR.
- Preparation of reports describing the performance of Plan investment manager(s) or investments, as well as comparing the performance to benchmarks.
- Ongoing recommendations for consideration and selection by client about specific investments to be held by the Plan or, in the case of a participant-directed defined contribution plan, to be made available as investment options under the Plan.
- Training for the members of the Plan Committee with regard to their service on the Committee, including education and consulting with respect to fiduciary responsibilities.
- Assistance in enrolling Plan participants in the Plan, including conducting an agreed upon number of enrollment meetings. As part of such meetings, Representatives may provide participants with information about the Plan, which includes information on the benefits of Plan participation, the benefits of increasing Plan contributions, the impact of pre-retirement withdrawals on retirement income, the terms of the Plan and the operation of the Plan.
- Assistance with investment education seminars and meetings for Plan participants. Such meetings may be on a group or individual basis, and includes information about the investment options under the Plan (e.g., investment objectives, risk/return characteristics, and historical performance), investment concepts (e.g., diversification, asset classes, and risk and return), and how to determine investment time horizons and assess risk tolerance. Such meetings do not include specific investment advice about investment options under the Plan as being appropriate for a particular participant.
- Assistance at client’s direction in making changes to investment options under the Plan.
- Assistance with the preparation, distribution and evaluation of Request for Proposals, finalist interviews, and conversion support in connection with vendor analysis and service provider support.
- Preparation of comparisons of Plan data (e.g., regarding fees and services and participant

enrollment and contributions) to data from the Plan's prior years and/or a benchmark group of similar plans.

- Assistance in identifying the fees and other costs borne by the Plan for, as specified by client, investment management, recordkeeping, participant education, participant communication and/or other services provided with respect to the Plan.

If the Plan makes available publicly traded employer stock ("company stock") as an investment option under the Plan, Representatives do not provide investment advice regarding company stock and are not responsible for the decision to offer company stock as an investment option. In addition, if participants in the Plan invest the assets in their accounts through individual brokerage accounts, a mutual fund window, or other similar arrangement, or obtain participant loans, IARs do not provide any individualized advice or recommendations to the participants regarding these decisions. Furthermore, IARs do not provide individualized investment advice to Plan participants regarding their Plan assets.

If a client elects to engage the firm and our IARs to perform ongoing investment monitoring and ongoing investment recommendation services in the client agreement, such services will constitute "investment advice" under of ERISA. Therefore, the firm and our IAR will be deemed a "fiduciary" in connection with those services. Clients should understand that to the extent the firm and our IARs are engaged to perform services other than ongoing investment monitoring and recommendations, those services are not "investment advice" under ERISA, and therefore, the firm and our IARs will not be a "fiduciary" under ERISA with respect to those other services.

From time to time the IAR may make the Plan or Plan participants aware of and may offer services available from IAR that are separate and apart from the services provided under Retirement Plan Consulting. Such other services may be services to the Plan or to a client with respect to client's responsibilities to the Plan and/or to one or more Plan participants. In offering any such services, the investment advisor representative is not acting as a fiduciary under ERISA with respect to such offering of services. If any such separate services are offered to a client, the client will make an independent assessment of such services without reliance on the advice or judgment of the IAR.

### **Retirement Plan Rollovers**

An employee generally has four (4) options for their retirement plan when they leave an employer:

1. Leave the money in his/her former employer's plan, if permitted
2. Rollover the assets to his/her new employer's plan, if one is available and permitted
3. Rollover to an Individual Retirement Account (IRA), or
4. Cash out the account value, which has significant tax considerations

The firm provides educational services pertaining to retirement plan assets that could potentially be rolled-over to an IRA managed by the firm. Education is based on a particular client's financial circumstances. the firm has an incentive to recommend such a rollover based on the compensation received, which is mitigated by the fiduciary duty to act in a client's best interest and acting accordingly.

### **Financial Planning Services**

Financial planning is generally included as part of a comprehensive asset management engagement. However, financial planning is also available separately for a separate fee. The type of plan can vary

greatly depending on the scope and complexity of a particular individual's financial situation.

### **Planning Strategies for Families and Individuals**

- **Cash Flow/ Budget Planning** – planning to manage expenses against current and projected income.
- **College / Education** – planning to pay the future college / education expenses of a child or grandchild.
- **Divorce Planning** – Planning for the financial impact of divorce such as change in income, retirement benefits and tax considerations. Providing alternatives to collaborative divorce attorneys to reapportion joint assets.
- **Estate Planning** – planning that focuses on the most efficient and tax friendly option to pass on an estate to a spouse, other family members or a charity.
- **Inheritance Planning** – planning for a tax efficient method to pass wealth to the next generation.
- **Insurance Needs** – planning for the financial needs of survivors to satisfy such financial obligations as housing, dependent child care and spousal arrangements as well as education.
- **Investment Planning** – planning an investment strategy consistent with a particular objectives, time horizons and risk tolerances.
- **Retirement** – planning an investment strategy with the objective of providing inflation-adjusted income for life.
- **Tax Planning** – planning a tax efficient investment portfolio to maximize deductions and off-setting losses.
- **Wealth Accumulation** – planning to build wealth within a portfolio that takes into consideration risk tolerance and time horizon.

### **Planning Strategies for Business**

- **Qualified Retirement Plans** – evaluate the types of retirement plans established by an employer for the benefit of the company's employees.
- **Stock Option Planning** – planning to maximize the value of employer issued stock options and optimize what to exercise and what to hold.

Prior to engaging the firm to provide stand-alone planning or consulting services, clients are required to enter into a Financial Planning and Consulting Agreement setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due prior to commencing services. The firm may recommend the services of professionals for implementation purposes, including our Investment Advisor Representatives in their individual capacities.



### **Client Account Management**

Prior to an engagement each client is required to enter into an agreement that defines the terms, conditions, and fees.

### **Assets Under Management**

The firm is a newly established advisor. Assets under management shall be amended following the firm's December 31, 2019 fiscal year. Clients may request more current information at any time by contacting the firm.

Assets under Management	
Discretionary	\$0.00
Non-Discretionary	\$0.00
Total	<b>\$0.00</b>

### **Item 5 – Fees and Compensation**

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#### **Investment Management Services**

Investment advisory fees are paid monthly, quarterly or as agreed in advance or in arrears pursuant to the terms of the investment advisory agreement. Fees are based on the market value of assets under management at the end of the prior calendar month or quarter or the daily average as agreed in the advisory agreement. Investment advisory fees are based on the scope and complexity of an account the degree of expertise required and the amount or time required but generally do not exceed an annualized rate of 1.5%.

The investment advisory fee in the first period of service is prorated from the inception date of the account[s] to the end of the first month or quarter depending on the fee schedule agreement. The Client's fees will take into consideration the aggregate assets under management with the firm. All securities held in accounts will be independently valued by the designated custodian. The firm will not have the authority or responsibility to value portfolio securities.

- If a client terminates an engagement prior to the period, a pro-rated fee calculation will be applied prior to releasing the funds.
- The firm's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses.

#### **Mutual Fund Share Class Disclosures**

Certain mutual fund share classes charge a 12b-1 fee that generally amounts to an additional .25% expense ratio or more. The purpose of 12b-1 fees, as approved by the SEC, are to cover marketing expenses and shareholder services such as support services and "other expenses" such as the legal, accounting and the administrative services. When selecting a mutual fund, there is a fiduciary duty to select the share class that helps manage the overall fee structure of the account. The overall fee structure includes such fees as the asset management fee, expense ratio and ticket charges.

- Mutual funds normally offer multiple share classes, including lower-cost share classes that do not charge 12b-1 fees and are therefore usually less expensive.

- Investment adviser representatives may or may not invest or hold client funds in 12b-1 fee paying share classes as appropriate to account for the overall fee structure and tax considerations of an account.

Depending on the anticipated trading volume, and the asset management fee that is determined based on account size, complexity and time requirements, investment advisor representatives have a fiduciary duty to determine the mutual fund share class that is in the best interest of each client as part of the overall fee analysis.

The overall mutual fund fee structure includes:

- Asset Management Fee
- Expense ratio
- 12b-1 fees
- Trade Ticket Charges

Investment advisor representatives will consider investing client funds in 12b-1 fee paying share classes even when a lower-cost share class is available to account for the overall fee structure, fund characteristics and/or performance history. The selection of a fund that pays a 12b-1 fee will usually cost more, which will have a negative affect on total returns.

- A share class that pays 12b-1 fee usually does not have transaction charges.
- Not all investors will qualify for all share classes
- Not all share mutual funds offered equivalent share classes.
  - 12b-1 fees are retained entirely by LPL.
  - LPL Financial does not share 12b-1 fees with individual investment advisor representatives in their independent capacity as registered representatives.

### **Cash Reserves**

Cash balances invested in LPL's multi-bank insured cash account (ICA) program are invested in Federal Deposit Insurance Corporation (FDIC) insured deposit accounts at one or more bank or other participating depository institutions. However, clients receive the same interest rate across all ICA deposit accounts taken in the aggregate based on a percentage of the average daily deposit balance. LPL receives a fee from the institutions participating in the ICA program based on the value of advisory assets held in the ICA program. This fee could be higher than the interest rate received by clients and/or could reduce the rate a client could receive elsewhere.

### **Fee Billing**

#### **Investment Management Services**

Investment advisory fees are calculated by the custodian and deducted from the Client's account[s] by the Custodian. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with the firm at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is

the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting the firm to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

### **Financial Planning Services**

The firm generally charges a fixed fee for financial planning services. The total estimated fee, as well as the ultimate fee that we charge you, is based on the scope and complexity of our engagement. Financial plans that are based on a fixed rate generally range from \$500 to \$5,000. A flat fee that exceeds \$5,000 is subject to approval by the Chief Compliance Officer.

### **Hourly Consulting Services**

The firm can charge an hourly fee generally ranging from \$250 to \$500 based on the scope, complexity and level of expertise required to provide hourly consulting when a more comprehensive financial plan is not requested. An hourly fee in excess of \$500 requires approval by the Chief Compliance Officer.

### **Retirement Plan Consulting**

The fee for Retirement Plan Consulting will generally not exceed 1.5% of plan assets under management. The total estimated fee, as well as the ultimate fee that we charge you, is based on the scope and complexity of the engagement. The fee-paying arrangement for Retirement Plan Consulting will be outlined in a separate agreement.

### **Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than the firm, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian and executing broker/dealer. The fees charged by the firm are separate and distinct from these custodial and execution fees.

In addition, all fees paid to the firm for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of the firm, but would not receive the services designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by the firm to fully understand the total fees to be paid.

### **Compensation for Sales of Securities**

The firm does not buy or sell securities to earn commissions and does not receive any commission compensation for securities transactions in any Client account. Clients can however engage Investment Adviser Representatives of the firm in their individual capacity as a Registered Representative of LPL to render brokerage services under a separate commission-based arrangement. Clients are under no obligation to engage investment adviser representatives of the firm in their individual capacity as registered representatives. Convergence Financial and LPL are unaffiliated separate legal entities, not under common control.

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

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The firm does not charge performance-based fees for its investment advisory services. The fees charged by the firm are as described in “Item 5 – Fees and Compensation” above and are not based upon the capital appreciation of the funds or securities held by any Client.

The firm does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend or implement any particular investment options.

## **Item 7 – Types of Clients**

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The firm offers investment advisory services primarily to individuals, high net worth individuals and retirement plans but services are available to other types of clients as the opportunity may arise. The number of each type of Client is provided on Form ADV Part 1A. These amounts change over time and are updated at least annually.

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

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### **Methods of Analysis**

The firm primarily employs a strategic asset allocation and a fundamental method of analysis in developing investment strategies. Research and analysis from the firm is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

- **Strategic Asset Allocation**

Strategic asset allocation is a portfolio strategy that involves setting target allocations for various asset classes and rebalancing periodically. The portfolio is rebalanced to the original allocations when they deviate significantly from the initial settings due to differing returns from the various assets.

- **Fundamental Analysis**

Fundamental analysis utilizes economic and business indicators as investment selection criteria. This criteria consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the firm in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The firm monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the firm’s review process are included below in “Item 13 – Review of Accounts”.

The firm will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, the firm may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class for portfolio management purposes.

## **Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. The firm will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the firm in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The firm monitors these economic indicators to determine if adjustments to strategic allocations are appropriate.

The specific risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The firm will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Below is a list of risks that should be considered prior to investing that may apply to the particular investment held in a particular account. Additional unforeseen risks may apply and affect investment performance. Clients are encouraged to at least consider the following risks:

- **Business Risk** – The measure of risk associated with a particular security. It is also known as unsystematic risk and refers to the risk associated with a specific issuer of a security. Generally speaking, all businesses in the same industry have similar types of business risk. More specifically, business risk refers to the possibility that the issuer of a particular company stock or a bond may go bankrupt or be unable to pay the interest or principal in the case of bonds.
- **Company Specific Risk** – An unsystemic risk specific to a certain company's operations, executive decisions and reputation which is difficult to quantify
- **Concentration Risk** – Concentrated portfolios are an aggressive and highly volatile approach to trading and investing and should be viewed as complementary to a stable, highly predictable investment approach. Concentrated portfolios hold fewer different stocks than a diversified portfolio and are much more likely to experience sudden dramatic price swings. In addition, the rise or drop in price of any given holding in the portfolio is likely to have a larger impact on portfolio performance, than a more broadly diversified portfolio.
- **Credit Risk** – The risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.
- **Currency/Exchange Rate Risk** – The risk of a change in the price of one currency against another.
- **Force Majeure** – A natural and unavoidable catastrophe that interrupts the expected course of events, market structure and access to funds.
- **Interest Rate Risk** – The risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes in interest rates than a bond or bond fund with a shorter duration.
- **Inflationary Risk** – The risk that future inflation will cause the purchasing power of cash flow from an investment to decline.

- **Legislative Risk** – The risk of a legislative ruling resulting in adverse consequences.
- **Liquidity Risk** – The possibility that an investor may not be able to buy or sell an investment as and when desired or in sufficient quantities because opportunities are limited.
- **Market Risk** – The risk that the value of securities may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries. This is a risk that will affect all securities in the same manner caused by some factor that cannot be controlled by diversification.
- **Reinvestment Risk** – The risk that falling interest rates will lead to a decline in cash flow from an investment when its principal and interest payments are reinvested at lower rates.
- **Social/Political Risk** – The possibility of nationalization, unfavorable government action or social changes resulting in a loss of value.
- **Taxability Risk** – The risk that a security that was issued with tax-exempt status could potentially lose that status prior to maturity. Since municipal bonds carry a lower interest rate than fully taxable bonds, the bond holders would end up with a lower after-tax yield than originally planned.
- **Terrorism Risk** – An act of terror or calculated use of violence against the country, market structure or individuals.

The firms' methods of analysis and investment strategies do not represent any significant or unusual risks however all strategies have inherent risks and performance limitations.

#### **Types of Investments (Examples, not limitations)**

Investment advisor representatives of the firm allocate a client's assets as appropriate to help them reach their individual investment objectives within their time horizon in a manner consistent with their risk profile. Client funds are allocated appropriately in such investments as listed below:

- **Annuities** – are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy.
  - **Variable Annuities** – If client purchases a variable annuity that is part of the program, client will receive a prospectus and should rely solely on the disclosure contained in the prospectus with respect to the terms and conditions of the variable annuity. Client should also be aware that certain riders purchased with a variable annuity may limit the investment options and the ability to manage the subaccounts. Variable annuities typically offer:
    - Regular stream of income or a lump sum payout at a future time
    - Tax-deferred treatment of earnings
    - Death benefits

Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because

substantial taxes and insurance company charges apply if money is withdrawn early. Variable annuities also involve investment risks, like mutual funds.

- **Cash Positions** – Based on a perceived or anticipated market conditions and/or events, certain assets may be taken out of the market and held in a defensive cash position. All cash may be included as assets subject to the agreed upon advisory fee. Other investment types may be included as appropriate for a particular client and their respective trading objectives. the firm, Inc. generally invest client's cash balances in money market funds, FDIC Insured Certificates of Deposit, high-grade commercial paper and/or government backed debt instruments. Ultimately, we try to achieve a reasonable return on our client's cash balances through relatively low-risk conservative investments.
- **Equity** – investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environment.
- **Exchange Traded Funds (ETFs)** – An ETF is a diversified investment very much like a mutual fund. Mutual funds can be actively managed to beat a benchmark index or designed to replicate the index. Like mutual funds, shares of an ETF represent a partial ownership of an underlying portfolio of securities. However, unlike mutual funds, shares of an ETF can be traded intraday during market hours.
- **Fixed Income** – investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.
- **Mutual Funds** – a pool of funds collected from many investors for the purpose of investing in securities such as stocks, bonds, money market instruments and similar assets.
  - **Open-End Mutual Funds** – a type of mutual fund that does not have restrictions on the amount of shares the fund will issue and will buy back shares when investors wish to sell. Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature

- **Alternative Strategy Mutual Funds** – Certain mutual funds available in the program invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies may not be suitable for all investors and involves special risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund's concentration in the real estate industry.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the firm.

### **Item 9 – Disciplinary Information**

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There are no legal, regulatory or disciplinary events involving the firm or any of its Supervised Persons.

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

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Investment advisor representatives of the firm are temporarily investment advisor representatives of Good Life Advisor, LLC., an unaffiliated SEC registered investment advisor.

- Dual registration is intended for a limited duration.
- Clients will only pay a single advisory fee during the transition period.
- Once all accounts are transitioned, investment advisor representatives will no longer be dually registered investment advisor representatives; however, they will remain dually registered as registered representatives of LPL for brokerage business.

### **Broker-Dealer Affiliation**

Certain Investment Advisor Representatives are also Registered Representatives of LPL in their individual capacity and are able to open brokerage accounts. An ongoing asset management fee does not apply to brokerage activity but commissions are relieved. Clients are not obligated to open any such account.

### **Insurance Agency Affiliations**

Certain Investment Advisor Representatives are also licensed insurance agents in their individual capacity and are able to sell insurance products. An ongoing asset management fee does not apply to insurance products but commissions are relieved. Clients are not obligated to open any such account.

### **Commodities**

Neither the firm nor any of the management persons are registered or has a registration pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.



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

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### **Code of Ethics**

The firm has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code applies to all persons associated with the firm (our “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. The firm and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of the firm’s Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (573) 818-2264 or by email at [travis@convergence-financial.com](mailto:travis@convergence-financial.com).

- **Personal Trading with Material Interest**

The firm allows Investment Advisor Representatives to purchase or sell the same securities that may be recommended or implemented to and purchased on behalf of Clients. The firm does not act as principal in any transactions. In addition, the firm does not act as the general partner of a fund, or advise an investment company and does not have a material interest in any securities traded in Client accounts.

- **Personal Trading in Same Securities as Clients**

The firm allows Investment Advisor Representatives to purchase or sell the same securities that may be recommended or implemented to and purchased on behalf of Clients. This presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures.

- **Personal Trading at Same Time as Client**

While the firm allows Investment Advisor Representatives to purchase or sell the same securities that may be recommended or implemented to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. At no time will the firm or any Supervised Person trade to the detriment of any Client.

## **Item 12 – Brokerage Practices**

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The firm requires clients to establish a brokerage account with Broker/Dealer Financial to maintain custody of clients’ assets and to effect trades for their accounts. LPL provides brokerage and custodial services for Convergence Financial.

For IRA accounts, LPL generally charges account maintenance fees. In addition, LPL also charges clients miscellaneous fees and charges, such as account transfer fees that are disclosed in the account opening documents. While LPL does not participate in, or influence the formulation of, the investment advice provided, any dually Registered Representative is restricted by certain FINRA rules and policies from maintaining client accounts at another custodian or executing client transactions in such client accounts through any broker/dealer or custodian that is not approved by Broker/Dealer.

- Convergence Financial is limited to offering services and investment products that are approved by LPL, and prohibited from offering services and investments available through other broker/dealers which may be more suitable.

- Not all investment advisers recommend that clients custody their accounts and trade through specific broker/dealers.

LPL is responsible under FINRA rules for supervising certain business activities of the firm and its Dually Registered Investment Advisors that are conducted through broker/dealers and custodians other than LPL. LPL charges a fee for its oversight of activities conducted through these other broker/dealers and custodians. This arrangement presents a conflict of interest because the firm has a financial incentive to recommend that you maintain your account with LPL rather than with another broker/dealer or custodian to avoid incurring the oversight fee.

### **Benefits Received**

LPL makes available various products and services designed to assist the firm in managing and administering client accounts. Many of these products and services may be used to service all or a substantial number of accounts, including accounts not held with LPL. These services include software and other technology that provide access to client account data (such as trade confirmation and account statements); facilitate trade execution (and aggregation and allocation of trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of fees; and assist with back-office functions; recordkeeping and client reporting.

LPL also makes available other services intended to help manage and further develop its business. Some of these services assist the firm to better monitor and service program accounts maintained at LPL; however, many of these services benefit only the firm, for example, services that assist with growing its business. These support services and/or products may be provided without cost, at a discount, and/or at a negotiated rate, and include practice management-related publications; consulting services; attendance at conferences and seminars, meetings, and other educational and/or social events; marketing support; and other products and services used in furtherance of the operation and development of its investment advisory business.

Where such services are provided by a third-party vendor, LPL will either make a payment to the firm to cover the cost of such services, reimburse for the cost associated with the services, or pay the third-party vendor directly on behalf of the firm.

The products and services described above are provided as part of the overall relationship with LPL. While as a fiduciary, The firm endeavors to act in its clients' best interests, the receipt of these benefits creates a conflict of interest because the recommendation to custody assets at the custodian could be based on the benefits services and not solely on the nature, cost or quality of custody or brokerage services provided.

### **Transition Assistance**

The custodian provided various benefits and payments to assist with the costs (including foregone revenues during account transition) associated with transitioning business (collectively referred to as "Transition Assistance"). The proceeds of such transition assistance payments are intended to be used for a variety of purposes, including but not necessarily limited to, providing working capital to assist in funding any outstanding debt owed to the prior firm, offsetting account transfer fees (ACATs), technology set-up fees, marketing and mailing costs, stationary and licensure transfer fees, moving expenses, office space expenses, staffing support and termination fees associated with moving accounts.

The amount of the transition assistance payments is often significant in relation to the overall revenue earned or compensation received at the prior firm. Such payments are generally based on the size of the business established at the prior firm and/or assets held by the custodian.

The receipt of Transition Assistance creates a conflict of interest because it creates a financial incentive to attract and maintain client accounts with a particular custodian.

### **Best Execution**

Although the commissions and/or transaction fees paid by our clients generally comply with our duty to obtain best execution, you may pay a commission that is higher than what another qualified broker-dealer might charge to affect the same transaction when we determine, in good faith, that the commission/transaction fee is reasonable in relation to the value of the brokerage and research services we receive.

In seeking best execution, the determining factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates, we may not necessarily obtain the lowest possible commission rates for client transactions. The brokerage commissions or transaction fees charged by the broker-dealer/custodian are exclusive of, and in addition to, our investment management fee. Our best execution responsibility is qualified if the securities we purchase are mutual funds that are traded at net asset value as determined at the daily market close.

### **Aggregation & Allocation of Transactions**

Although each client's portfolio accounts are individually managed, we may purchase or sell the same securities at the same time for multiple clients. When this occurs, it is often advantageous to aggregate the securities of multiple clients into one trading block for execution. If your portfolio securities are purchased or sold in an aggregated transaction with the securities of other clients, you will all receive the same execution price, and if the aggregated purchase or sale involves several executions to complete the transaction, you will all receive the average price paid or received on the aggregated transaction.

However, if an aggregated transaction results in only a partial execution and the equal allocation of the partial execution amongst multiple clients would result in an inefficient trading unit in client portfolios, we reserve the right to allocate the transaction to specific individual clients on an equitable rotational basis so that over time no client is disadvantaged in the management of its portfolio.

### **Directed Brokerage**

The firm does not accept directed brokerage arrangements (when a client requires that account transactions be executed through a specific broker-dealer).

### **Soft Dollars**

Soft dollars are revenue programs offered by broker/dealers whereby an advisor enters into an agreement to place security trades in exchange for research and other services.

The firm receives support services without cost, at a discount, and/or at a negotiated rate, that include such things as research reports or other information about particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database

software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making.

These support services are provided based on the overall relationship without a minimum production level or value of assets held with the custodian. Consequently, they are not the result of a soft dollar arrangements or any other express arrangements that involves the execution of client transactions as a condition to the receipt of services.

## **Item 13 – Review of Accounts**

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### **Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Mr. Gromis as the Chief Compliance Officer. Formal reviews are generally conducted at least annually or more or less frequently as needed. The surveillance process focuses on accounts that have potential issues in the following areas:

- Market Performance
- Trading Inactivity
- High Cash Balance
- Position Concentration
- Asset Allocation
- Risk Tolerance
- Senior Suitability

### **Causes for Reviews**

In addition to the investment monitoring noted above, each Client account shall be reviewed at least annually by their investment advisor representative. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify the firm if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **Review Reports**

The Client will receive statements no less than quarterly from the Custodian. These statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client statements will include all positions, transactions and fees relating to the Client's account[s].

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

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### **LPL Financial LLC**

The firm receives an economic benefit in the form of reimbursement for marketing related expenses. Please see detailed discussion of the categories of marketing related expenses and potential conflicts of interest.

The firm and employees may receive additional compensation from product sponsors. However, such compensation may not be tied to the sale of products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings with investment advisor representative, client workshops or events, marketing events or advertising initiatives, including services for identifying prospective clients.

Product sponsors may also pay for, or reimburse RIA for the costs associated with, education or training events that may be attended by RIA employees and investment advisor representatives and for RIA sponsored conferences and events.

### **Client Referrals from Solicitors**

The firm does not engage paid solicitors for Client referrals.

### **Item 15 – Custody**

The firm does not have custody of client funds or securities. Upon opening an account with a qualified custodian on a client's behalf, we promptly notify the client in writing of the qualified custodian's contact information. If we decide to also send account statements to clients, such notice and account statements include a legend that recommends that the client compare the account statements received from the qualified custodian with those received from our firm.

- Clients should review the fee calculated and deducted by the custodian to ensure that the fees were calculated correctly.

### **Item 16 – Investment Discretion**

Clients can determine to engage the firm to provide investment advisory services on a discretionary, limited discretionary (mutual funds and ETFs only) or non-discretionary basis.

Full discretion includes the authority to determine the securities to be bought or sold and well as the amount. Prior to the firm assuming discretionary authority over a client's account, the client shall be required to execute a written agreement, granting the firm full or limited authority to buy, sell, or otherwise effect transactions.

### **Item 17 – Voting Client Securities**

The firm does not vote client proxies, but third-party money managers selected or recommended by our firm may vote proxies for clients. Clients will otherwise receive their proxies or other solicitations directly from their custodian. Except in the event a third-party money manager votes proxies, clients maintain exclusive responsibility for:

- directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted; and,
- making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

### **Item 18 – Financial Information**

Neither the firm, nor its management, have any adverse financial situations that would reasonably impair their ability to meet all obligations to its Clients.

- Neither the firm, nor any of its the control persons, has been subject to a bankruptcy or financial compromise.
- The firm does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

## Item 1 – Cover Page

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Registered As: Convergence Financial, LLC | Doing Business as: Convergence Financial



200 East Southampton Drive – Suite 102 | Columbia, MO 65203

Phone: (573) 818-2264

<https://convergence-financial.com>

## Appendix 1 – Wrap Fee Program Brochure

**Effective: June 01, 2019**

This Form ADV2A - Appendix 1 (“Wrap Fee Brochure”) provides information about the qualifications and business practices for the firm (“the firm” or the “the firm”) services when offering services pursuant to a wrap program. This Wrap Fee Brochure shall always be accompanied by the the firm Disclosure Brochure, which provides complete details on the business practices of the the firm. If you did not receive the complete the firm Disclosure Brochure or you have any questions about the contents of this Wrap Fee Brochure or the the firm Disclosure Brochure, please contact us at (573) 818-2264 or by email at [travis@convergence-financial.com](mailto:travis@convergence-financial.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 the firm and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD No. 304146. Registration does not imply a certain level of skill or training.

## **Item 2 - Material Changes**

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If the firm amends this brochure so that it contains material changes from the last annual update, the changes will be identified in this item.

Clients will receive, at no charge, a summary of any material changes within 120 days of the firm's fiscal year end and promptly (generally within 30 days) after any material changes throughout the year.

**Item 3 – Table of Contents**

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#### **Item 4 – Services, Fees and Compensation**

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The firm provides investment advisory services where the asset management fee and ticket charges are “wrapped” into a single fee. This Wrap Fee Program Brochure is provided as a supplement to the the firm Disclosure Brochure (Form ADV 2A) to provide further details of the business practices and fee structure.

This Wrap Fee Program Brochure references back to the the Form ADV 2A in which this Wrap Fee Program Brochure serves as an Appendix. Please see Item 4 of the Form ADV 2A for details on the firm’s investment philosophy, services and fee structure.

The firm is the sponsor and portfolio manager of this Wrap Fee Program, receives investment advisory fees paid by clients and pays the Custodian for the costs associated with the normal trading activity.

Participation in this wrap fee program may cost more or less than purchasing such services separately.

#### **Item 5 – Account Requirements and Types of Clients**

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Please see Item 7 – Types of Clients in the Form ADV 2A Disclosure Brochure.

#### **Item 6 - Portfolio Manager Selection and Evaluation**

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The firm serves as sponsor and portfolio manager for the services under this Wrap Fee Program. The firm does not charge performance-based fees.

The firm does not accept proxy-voting responsibility. Clients will receive proxy statements directly from the Custodian. the firm can assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

#### **Item 7 – Client Information Provided to Portfolio Managers**

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The firm is the sponsor and sole portfolio manager for the Program. There is no other portfolio manager where client information can be shared.

#### **Item 8 – Client Contact with Portfolio Managers**

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The firm is a full-service investment management advisory firm. Clients always have direct access to the Portfolio Managers at the firm.

#### **Item 9 – Additional Information**

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The backgrounds, disciplinary information (none) and other financial industry activities and affiliations is available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD No. 304146 as well as Items 10 and 14 of the Form ADV Part 2A.

Please also see Item 9 of the the firm Disclosure Brochure as well as Item 3 of each Investment the firm Representatives Form ADV 2B Brochure Supplement (included with this Wrap Fee Program Brochure) for additional information on how to research the background information.

The firm has implemented a Code of Ethics that defines our fiduciary commitment to each Client. The details of the the firm Code of Ethics can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

Client accounts are monitored on a regular and continuous basis by the firm under the supervision of the Chief Compliance Officer (“CCO”). Details of the review policies and practices are provided in Item 13 of the Form ADV Part 2A – Disclosure Brochure.

Please see Item 14 – Other Compensation in the Form ADV Part 2A – Disclosure Brochure (included with this Wrap Fee Brochure) for details on additional compensation that may be received by the firm or its Investment the firm Representatives. Each IAR’s Form ADV 2B Brochure Supplement (also included with this Wrap Fee Brochure) provides details on any outside business activities and the associated compensation.

- The firm does not pay a referral fee for the introduction of clients.
- Financial information is available in Item 18 of the Form ADV Part 2A – Disclosure Brochure.

## Privacy Policy

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Effective: June 01, 2019

### Our Commitment to You

Convergence Financial, LLC (the “the firm”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment the firm, as described here in our Privacy Policy (“Policy”).

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. the firm (also referred to as “we”, “our” and “us”) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

The firm does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below. Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Driver’s license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client’s personal information. We require third parties that assist in providing our services to you to protect the personal information they receive from us.

## How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We share information with technology vendors and third-party service providers to manage and support operations and regulatory compliance (such as administrators, brokers, custodians, regulators, credit agencies, consultants and other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> The firm does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Shadow Wealth Management or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> The firm does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

## Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise this Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

## Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (573) 818-2264 or by email at [travis@convergence-financial.com](mailto:travis@convergence-financial.com).