



**DICKMEYERBOYCE**  
FINANCIAL MANAGEMENT, INC.

## Dickmeyer Boyce Financial Management, Inc.

Fee-Only Financial Planning and Wealth Management

6506 Constitution Drive, Fort Wayne, IN 46804

(260) 436-2051

### Firm Brochure

(Part 2A of Form ADV)

This brochure provides information about the qualifications and business practices of Dickmeyer Boyce Financial Management, Inc. (DBFM). If you have any questions about the contents of this brochure, please contact us at (260) 436-2051. 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.

Dickmeyer Boyce Financial Management, Inc. is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Dickmeyer Boyce Financial Management, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

March 28, 2014



## **Annual Update**

The material changes section of this brochure will be updated annually when material changes occur since the previous release of the firm brochure.

In the future, this brochure will discuss only specific material changes that are made to the brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

## **No Material Changes since the Last Update**

On July 28, 2010, the United State Securities and Exchange Commission published "Amendments to Form ADV" which amends the disclosure document that we provide to clients as required by SEC Rules. As such, this document is materially different in structure and requires certain new information that our previous brochure did not require.

This brochure dated March 28, 2014 requires advisers to provide a Firm Brochure in narrative "plain English" format. The new final rule specifies mandatory sections and organization. As such we have revised our ADV Part II Form to reflect this new rule.

If you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at (260) 436-2051.



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Brochure Supplement(s)



## Item 4 – Advisory Business

### **Firm Description**

Dickmeyer Boyce Financial Management, Inc. (DBFM) is a Fee-Only financial planning and wealth management firm. We do not sell any financial products nor do we receive commissions for recommending or placing clients in financial products. The firm's compensation is solely from fees paid directly by clients. The firm does not receive commission based on the client's purchase of any financial product, including insurance. **No commissions in any form are accepted. No referral fees are paid or accepted. No benefits are received from custodians/broker-dealers based on client securities transactions ("soft dollar benefits"). DBFM is a Fiduciary to all clients all of the time.**

Dickmeyer Boyce Financial Management, Inc. provides personal financial planning and investment management to individuals, families and their related entities, trusts and estates, and family businesses. Dickmeyer Boyce works with clients to define financial objectives and to develop strategies for reaching those objectives, some of which may include identification of financial problems, cash flow and budgeting management, tax planning, risk exposure review, investment management, education funding, retirement planning, estate planning, and other issues specific to the client.

We may recommend other professionals (e.g., attorneys, accountants, insurance agents, real estate agents etc.) at the request of the client. Other professionals are engaged directly by the client on an as-needed basis even when recommended by the advisor. Conflicts of interest will be disclosed to the client and managed in the best interest of the client.

### **Principal Owners**

Founded in 2002, Dickmeyer Boyce has five employees including one Certified Financial Planner™ designee. David A. Dickmeyer, Ian D. Boyce and Jeffrey K. Presley are Principal Owners in the firm. There are no intermediate subsidiaries. All three Principal Owners serve as Investment Advisers and they are supported by a Research Analyst, Director of Operations and a part-time administrative assistant. The firm is federally registered with the SEC (Securities and Exchange Commission) as a registered investment adviser.

### **Types of Advisory Services**

Dickmeyer Boyce Financial Management, Inc. offers investment advisory services (i.e. asset management) and financial planning services. DBFM will only provide asset management services as part of an ongoing financial planning relationship. Prospective clients must go through the Retirement Capital Projection process before engaging in our asset management service. The Retirement Capital projection process seeks to further our understanding of the client's financial needs so we may tailor their portfolio in consideration of those needs while seeking to take the least amount of risk necessary to achieve their objectives.

In performing its services, Dickmeyer Boyce Financial Management, Inc., is not required to verify any information received from the client or from the client's other professionals. Each client is advised that it remains his/her responsibility to promptly notify Dickmeyer Boyce when there is a change in his/her financial situation and/or financial objectives for the purpose of reviewing, evaluating, or revising previous recommendations and/or services.

The following are typical services offered to clients:



### **Comprehensive Financial Planning**

This service includes financial planning, implementation, and ongoing asset management/monitoring services. Financial planning may include identification of financial problems, cash flow and budgeting management, tax planning, risk exposure review, investment management, education funding, retirement-planning, small-business planning issues, fringe benefits and any other issues specific to the client. A written evaluation of the client's current situation and their goals is provided to the client. The engagement also includes implementation of recommendations accepted by the client, unlimited telephone support, meetings as required, ongoing financial planning services, reminders of specific courses of action that need to be taken and quarterly portfolio reviews as negotiated with each client.

### **Personal Financial Overviews (Retirement Capital Projections)**

Dickmeyer Boyce offers Personal Financial Overviews (Retirement Capital Projections) and hourly financial advice. The Personal Financial Overview is a 2-hour review of the client's overall financial picture. The overview involves a complex cash flow analysis with a focus on retirement and tax planning. However, its primary objective is addressing the financial questions that are important to the client. Whether the client is seeking knowledge about retirement readiness or an overview of their portfolio, DBFM will analyze the client's situation and provide them with recommendations targeted to meet their specific goals. Clients receive a detailed follow-up letter with reports, recommendations, and a summary.

Additionally, the overviews are helpful in determining the appropriate portfolio strategy for clients who decide to utilize our Asset Management service. Prospective clients who go through the process, who meet our investment minimum and who choose to use our asset management service after having gone through this process, will have their fee waived should they decide to become clients. The cost for this service is \$1,000.

### **Hourly Engagements**

Some clients may choose to utilize our services on an hourly basis. The scope of the engagement will be clearly outlined in an engagement letter prior to the meeting. Dave Dickmeyer, Ian Boyce and Jeff Presley's hourly rate is \$200.

### **Asset Management Service**

Dickmeyer Boyce will manage individual client and corporate portfolios for a fee using no-load mutual funds, exchange traded funds, individual stocks and bonds. We use a diversified asset allocation approach that manages risk before return to achieve the long-term objectives of our clients. Instead of charging commissions on the investments selected for you, we are paid a percentage of the total assets under management. The annual fee starts at 1% per year or 0.25% per quarter and it is marginally lower at various break points with increasing assets under management. Clients need to meet a minimum household account balance of \$300,000.

### **Tailored Relationships**

At Dickmeyer Boyce Financial Management, Inc., advisory services are tailored to the individual needs of our clients. In some instances clients may wish to combine the use of our Asset Management Service with Financial Planning. In those cases our agreement will clearly differentiate the fee for Assets under Management and the stated Financial Planning Fee. A separate section of the agreement will govern each service. Client goals and objectives are clarified in meetings and via correspondence and are used to determine the course of action for each individual client. The goals and objectives for each client are documented in client files, either in hard copy or electronic files.



Clients may impose restrictions on investing in certain securities or types of securities. This must be done in writing and be signed by the client and Dickmeyer Boyce. Agreements may not be assigned without client consent.

### **Managed Assets**

As of December 31, 2013 Dickmeyer Boyce Financial Management, Inc. has \$144 million under management. These assets are 100% discretionary unless they are coded as unmanaged in the DBFM portfolio management system. Dickmeyer Boyce exercises discretion over client portfolios. This means that DBFM has the authority to place trades for the client's account without approval from the client in advance of each trade.

Assets under the direct management of Dickmeyer Boyce Financial Management, Inc. are held by independent custodians including Charles Schwab & Co., Fidelity Investments, or others, in the client's name. Dickmeyer Boyce does not act as a custodian of client assets.

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

Dickmeyer Boyce Financial Management, Inc. bases its fees on a percentage of assets under management, hourly charges, fixed fees, and retainers.

The specific manner in which fees are charged by Dickmeyer Boyce is established in a client's written agreement with Dickmeyer Boyce. Dickmeyer Boyce will generally bill its fees on a quarterly basis. Clients may pay the fee directly or may have the fee removed from their account by the custodian. The fees are billed in arrears. This means that while the fee is calculated using the exact dollar amount invested at the beginning of the quarter, the fee is actually withdrawn and billed to the client's respective account at the end of each quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any unpaid fees will be due.

### **Asset Management Fees**

Dickmeyer Boyce charges a fee for the Asset Management service that is based upon the assets that are under management at the beginning of each quarter. The fee is calculated using the following schedule.

#### **Clients and Corporations:**

First \$500,000 – 1.00% per year.

Amounts above \$500,000 -- \$5,000 plus 0.80% per year on amounts above \$500,000.

Amounts above \$1,000,000 -- \$9,000 plus 0.60% per year on amounts above \$1,000,000.

Amounts above \$2,000,000 -- \$15,000 plus 0.40% per year on amounts above \$2,000,000.

Accounts above \$5,000,000 have negotiable fees.

**The minimum Asset Management fee is \$3,000 per year. The minimum portfolio size currently being accepted is \$300,000.**

#### **ERISA Plans:**

Asset Management Fee for ERISA Plans is based upon the following schedule:

First \$1,000,000 – 0.65% per year.

Amounts above \$1,000,000 but less than \$2,000,000 - \$6,500 plus 0.50% per year on amounts over \$1,000,000.



Amounts above \$2,000,000 but less than \$3,000,000 - \$11,500 plus 0.35% per year on amounts over \$2,000,000.

Accounts above \$3,000,000 - \$15,000 plus 0.25% on amounts greater than \$3M.

**The minimum portfolio size currently being accepted for ERISA plans is \$500,000.**

#### **Charitable Accounts:**

Charitable accounts and non-profit accounts are managed at 0.40% per year. The minimum account size is \$200,000 or the above ERISA fee schedule is used.

#### **Comprehensive Financial Planning Fees**

Initial financial planning fees for the comprehensive financial planning agreement are calculated on a formula basis and adjusted for complexity of individual situations. Initial fees are determined by an engagement letter and are based on a variety of factors, including but not limited to historical relationship, total assets, type of assets, anticipated future additional assets, complexity of financial planning needs, etc or negotiation with clients. A detailed fee schedule showing calculations is provided with the initial invoice. Fees may be withdrawn directly from the client's account or paid directly by the client.

Dickmeyer Boyce Financial Management, Inc. also offers an Asset Management Service that is separate from the Comprehensive Financial Planning service and we recognize the additional value we can add to a client's financial situation by combining both services. In order to encourage our Asset Management clients to pursue the advantages of a Comprehensive Financial Plan, we attempt to offer the financial plan at a discount if they use both services. We do this by assessing a flat charge of \$4,000 per year to each of our Asset Management clients who also wish to have financial plans completed. We then reduce the combined Asset Management and Financial Planning fee by the amount of fees collected for the Asset Management service.

#### **Personal Financial Overview Fees**

A typical fee for this service \$1,000. Annual reviews and plan updates can be completed on an hourly basis and will be billed at the disclosed hourly rate.

Unless otherwise stated in an engagement letter, all engagements are billed and due within 30 days of completion of the specified work.

#### **Other Fees**

Since DBFM does not take custody of client's assets, a custodian is used (i.e. Charles Schwab/Fidelity). The Custodian charges transaction fees, or otherwise is paid part of the mutual fund's published management fee to serve as custodian. Any transaction fee that the client pays represents an additional layer of management fees.

Custodians may charge transaction fees on purchases or sales of certain mutual funds, stocks, bonds, and exchange traded funds. These transaction charges are usually relatively small and are incidental to the purchase or sale of a security. In some cases, custodians also charge monthly, quarterly or annual custody fees. Fees for custody are disclosed to clients when this type of arrangement is recommended.

Mutual funds and exchange traded funds generally charge a management fee for their service as investment managers. The management fee is included in the expense ratio. Mutual fund fees also include transaction charges for the purchase or sale of securities within the fund and may charge other fees as disclosed in the fund



prospectus. These fees are in addition to the fees paid by the client to Dickmeyer Boyce Financial Management, Inc.

### **Past Due Accounts and Termination of Agreement**

Dickmeyer Boyce Financial Management, Inc. reserves the right to stop work on any account that is more than 60 days overdue. In addition, Dickmeyer Boyce reserves the right to terminate any financial planning engagement where a client has willfully concealed or refused to provide pertinent information about financial situations when necessary and appropriate to provide proper financial advice, per the judgment of DBFM.

Clients may terminate the agreement at any time by providing written notice. Terminating clients will receive an itemized bill for work completed.

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

Dickmeyer Boyce Financial Management, Inc. does not use a performance-based fee structure (fees based on a share of capital gains or capital appreciation of the assets of a client) because of the potential conflict of interest it creates. Performance based compensation may create an incentive for the advisor to recommend an investment that may carry a higher degree of risk to the client. However, the nature of the asset-based fees allows Dickmeyer Boyce to participate in the growth of the client's wealth. This also means that our fees can decline when a client portfolio declines in value.

### **Item 7 – Types of Clients**

Dickmeyer Boyce Financial Management, Inc. provides portfolio management services to individuals, families, trusts and estates. Advice may extend to entities related to the client such as small businesses and charitable organizations including foundations and endowments. Client relationships vary in scope and length of service.

Additionally, we serve high net worth individuals and corporate pension and profit-sharing plans.

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

Security analysis methods at Dickmeyer Boyce Financial Management, Inc. include fundamental analysis. The main sources of information include Value Line reports, Morningstar reports and web-based research; S&P reports and fund prospectuses. Additionally, employees of Dickmeyer Boyce review financial newspapers and magazines, research materials prepared by others, and filings with the Securities and Exchange Commission in annual reports. Employees at Dickmeyer Boyce also participate in on-site visits with fund representatives and portfolio managers, conference calls and industry conferences.

### **Investment Strategies**

The primary investment strategy we use for clients is strategic asset allocation. We may use passively managed index and exchange traded funds when appropriate for the client as well as actively managed funds, dividend producing stocks, and individual municipal bonds where there are opportunities to make a difference by the security's selection. Portfolios are generally globally diversified to control the risk associated with traditional markets.





The investment strategy for a specific client is based upon the objectives, income needs, and tax situation stated by the client during consultations. The client may change these objectives at any time. The client's goals and objectives are recorded in the Retirement Capital Projection or a financial planning letter and reinforced during client meetings. Each portfolio is constructed solely for client.

### **Risk of Loss**

All investment programs have certain risks that are borne by the investor. Our investment approach keeps the risk of loss in mind. However, as with all investments, clients face investment risk including the following: loss of principal risk, interest rate risk, market risk, inflation risk, currency risk, reinvestment risk, business risk, liquidity risk, and financial risk.

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

Registered Investment Advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Dickmeyer Boyce or the integrity of Dickmeyer Boyce's management. **The firm and its employees have not been involved in any legal or disciplinary events related to past or present activities.**

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

Dickmeyer Boyce Financial Management, Inc. does not participate in any other industry business activities. Nor does Dickmeyer Boyce have any arrangements that are material to its advisory business or its clients with any related person.

### **Item 11 – Code of Ethics**

Dickmeyer Boyce Financial Management, Inc. has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Dickmeyer Boyce must acknowledge the terms of the Code of Ethics annually, or as amended. CFP® designees are also held to a Code of Ethics as outlined by the CFP Board of Standards. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

### **Participation or Interest in Client Transactions**

Dickmeyer Boyce anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which DBFM has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which DBFM, and/or clients, directly or indirectly, have a position of interest. DBFM's employees are required to follow our Code of Ethics. Subject to satisfying this policy and applicable laws, officers and employees of DBFM may trade for their own accounts in securities which are recommended to and/or purchased for DBFM's clients.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of DBFM will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while at the same time allowing employees to invest for their own accounts. Under



the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of DBFM's clients.

In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee.

The Chief Compliance Officer for Dickmeyer Boyce Financial Management, Inc. is Jeffrey K. Presley. Jeff reviews all employee trades each quarter. His personal trades are reviewed by First Vice President Ian D. Boyce. Personal trading reviews ensure that the personal trading of employees was not based on inside information and that the clients of the firm received preferential treatment. The trades are not of significant enough value to affect the securities markets.

### **Item 12 – Brokerage Practices**

Dickmeyer Boyce Financial Management, Inc. does not have any affiliation with product sales firms. Specific custodian recommendations are made to clients based on their need for such services. Dickmeyer Boyce recommends custodians based on the proven integrity and financial responsibility of the firm, best execution of orders at reasonable commission rates, and the quality of client service.

Dickmeyer Boyce recommends discount brokerage firms and trust companies (qualified custodians), such as Charles Schwab and Fidelity. Dickmeyer Boyce does not receive fees or commissions from any of these arrangements, although they may benefit from the electronic delivery of client information, electronic trading platforms and other services provided by custodians for the benefit of clients. Dickmeyer Boyce may also benefit from other services provided by custodians, such as research, continuing education, and practice management advice. These benefits are standard in a relationship with these custodians and are not in return for client recommendations or transactions.

Dickmeyer Boyce annually reviews the execution of trades and trading fees charged at each custodian. The review is documented in our policies and procedures manual.

#### **Soft Dollars**

Dickmeyer Boyce Financial Management, Inc. does not receive soft dollar benefits from the custodians to whom we recommend clients.

#### **Directed Brokerage**

We do not direct brokerage for specific client transactions except individual municipal bonds, where we select a broker dealer with the best pricing on each individual trade.

### **Item 13 – Review of Accounts**

The frequency of reviews is individually negotiated with each client. However, in general it is the intention of Dickmeyer Boyce to meet with all clients at least four times per year. Comprehensive financial planning clients are provided with quarterly, semiannual or annual reviews which may also include asset allocation updates and rebalancing, performance reviews, tax and estate planning reviews, cash flow monitoring and more. A review



may be triggered by client request, changes in market conditions, new information about an investment, changes in tax laws, or other important changes.

Written reports are sent to all clients at least annually. Year-end reports include a summary of portfolio holding and performance information. They are combined with Realized Gain/Loss reports for the year to facilitate tax return preparation. Periodically, Dickmeyer Boyce produces a newsletter summarizing our general thoughts on the economy or addressing items of particular interest or importance. These letters are mailed electronically or via the U.S. Post Office to all clients for their review.

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

Dickmeyer Boyce Financial Management, Inc. has been fortunate to receive many client referrals over the years. The referrals have come from current clients, estate planning attorneys, accountants, employees, personal friends and other sources. The firm does not pay for referrals.

Additionally, Dickmeyer Boyce does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

#### **Item 15 – Custody**

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Dickmeyer Boyce urges clients to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. In some investment management client relationships, clients may request that Dickmeyer Boyce provide direct asset management services for "held away" accounts such as employer sponsored 401(k) plans. Currently Dickmeyer Boyce manages 21 client accounts under this arrangement. Under SEC Custody rules, Dickmeyer Boyce is deemed to have custody of such client accounts and therefore would be subject to an annual surprise audit by an independent auditing firm.

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

Dickmeyer Boyce Financial Management, Inc. accepts discretionary authority to manage securities accounts on behalf of clients. Dickmeyer Boyce has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Discretionary trading authority facilitates placing trades in clients' accounts on their behalf so that we may promptly implement the investment policy that they have approved. In most cases clients are provided with an opportunity for review and discussion prior to implementation of the recommendations. In all cases, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

Investment guidelines and restrictions must be provided to Dickmeyer Boyce in writing.

Clients must sign a Limited Power of Attorney before Dickmeyer Boyce is given discretionary authority. The Limited Power of Attorney is included in the qualified custodians account application.



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

As a matter of firm policy and practice, Dickmeyer Boyce does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios.

## **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. **Dickmeyer Boyce Financial Management, Inc. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.** A balance sheet is not required to be provided because Dickmeyer Boyce does not serve as a custodian for client funds or securities, other than as described above, and does not require prepayment fees of more than \$1,200 per client, six months or more in advance.

### **Business Continuity Plan**

Dickmeyer Boyce Financial Management, Inc. has a business continuity plan in place that provides detailed steps to mitigate and recover from loss of office space, communications, services or people.

Business continuity plan covers natural disasters such as snowstorms, tornadoes, fire and flooding. The plan also covers man-made disasters such as the loss of electrical power, fire, communication line outage, Internet outage etc. Electronic files are backed up daily and archived on and off-site.

Alternate work locations are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

### **Information Security**

Dickmeyer Boyce is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us. Employees of Dickmeyer Boyce Financial Management, Inc. and associated companies are committed to the provisions of the Gramm-Leach-Bliley Act (the “Privacy Act”) passed in November 1999. The Privacy Act specifically identifies three groups of individuals: non-consumers, consumers, and customers.

**Non-Consumers:** Non-consumers, such as prospects and professional firms (CPAs, attorneys), are provided our Privacy Statement as part of the marketing pocket folder that we send in advance of an initial meeting.

**Consumers:** When a prospect fills out a set of Fact Finding Data Sheets and a Confidential Financial Planning Questionnaire, whereby they begin to disclose nonpublic personal information, they become consumers. The information provided in the Fact Finding Data Sheets is not disclosed to any nonaffiliated third party, so there is no need for an opt-out opportunity.

**Customers:** The Privacy Act requires annual delivery of a Privacy Statement (not merely an offer to send, as with Form ADV) to all customers. Annually, with Year-end statements clients (customers) are sent a copy of our Privacy Statement. Client agreements include the Privacy Statement language to reinforce our commitment to client privacy.



**Hardware:** The Company maintains a hardware firewall to protect our server from intrusion by outside parties whereby nonpublic personal information might be accessed from outside the Company.

**Software:** The Company uses 128-bit encryption software when downloading data from the Internet into our portfolio management system.

**Physical Access:** During normal business hours, our office entrance is continuously in view of employees. Outside of normal business hours, an intruder would have to break through locked doors to obtain physical access to our files. Office cleaning is performed with an employee of the firm present at all times.

**E-Mail:** Detailed investment advice and highly sensitive numerical information may be sent via email using SSAE 16 audited datacenters ensuring privacy with encrypted files. If a client requests investment advice, a telephone or office appointment is suggested, or a letter is written addressing the issue.

**Employees:** Employees acknowledge the Company privacy policy by signing a Privacy Policy Acknowledgement form.

The master list of clients to whom the Privacy Statement has been sent each year is maintained in the filing cabinets with all client letters, along with the list of people to whom the quarterly newsletter is mailed.