



FORM ADV PART 2A BROCHURE

Cassady Schiller Wealth Management, LLC  
4555 Lake Forest Drive, Suite 400  
Cincinnati, Ohio 45242  
513-483-6652  
[www.cassadyschillerwealth.com](http://www.cassadyschillerwealth.com)  
March 19, 2018

This Brochure provides information about the qualifications and business practices of Cassady Schiller Wealth Management, LLC.

If you have any questions about the contents of this Brochure, please contact us at 513-483-6652 and/or [mwambaugh@cassadyschillerwealth.com](mailto:mwambaugh@cassadyschillerwealth.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.

Cassady Schiller Wealth Management 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 Cassady Schiller Wealth Management also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 129113.

## Item 2 – Material Changes

The material changes in this brochure from the last updating amendment of Cassidy Schiller Wealth Management on March 3, 2017 are described below. This list summarizes changes to policies, practices or conflicts of interests only.

- Cassidy Schiller Wealth Management has updated their fee schedule, which becomes effective March 31, 2018.
- The updated fee schedule is detailed on page 7 under Item 5 “Fees and Compensation”.

In the past, Cassidy Schiller Wealth Management has offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, Cassidy Schiller Wealth Management will ensure that its clients 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.

Cassidy Schiller Wealth Management will further provide its clients with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Kelly Murphy at 513-483-6652 or [kmurphy@cassadyschillerwealth.com](mailto:kmurphy@cassadyschillerwealth.com). Additionally, our Brochure is available on our web site [www.cassadyschillerwealth.com](http://www.cassadyschillerwealth.com), free of charge.

Additional information about Cassidy Schiller Wealth Management is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with Cassidy Schiller Wealth Management who are registered, or are required to be registered, as investment adviser representatives of Cassidy Schiller Wealth Management.

### Item 3 -Table of Contents

Item 1 – Cover Page .....	1
Item 2 – Material Changes.....	2
Item 3 – Table of Contents.....	3
Item 4 – Advisory Business.....	4
Item 5 – Fees and Compensation.....	7
Item 6 – Performance-Based Fees and Side-by-Side Management.....	10
Item 7 – Types of Clients.....	11
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	12
Item 9 – Disciplinary Information.....	13
Item 10 – Other Financial Industry Activities and Affiliations.....	14
Item 11 – Code of Ethics .....	15
Item 12 – Brokerage Practices.....	16
Item 13 – Review of Accounts.....	19
Item 14 – Client Referrals and Other Compensation.....	20
Item 15 – Custody.....	21
Item 16 – Investment Discretion.....	22
Item 17 – Voting Client Securities.....	23
Item 18 – Financial Information.....	24

## **Item 4 – Advisory Business**

Cassady Schiller Wealth Management has been in business since 1999. In February 2017, CSA Financial Advisors, LTD changed its name to Cassady Schiller Wealth Management.

Cassady Schiller Wealth Management is privately held, and the firm ownership is disclosed on Schedule A of Form ADV Part 1, which is available at [www.adviserinfo.gov/sec](http://www.adviserinfo.gov/sec).

Cassady Schiller Wealth Management offers the following services to advisory clients.

### **INVESTMENT MANAGEMENT SERVICES**

Cassady Schiller Wealth Management manages investment portfolios for individuals, qualified retirement plans, trusts and small businesses. Cassady Schiller Wealth Management will work with a client to determine the client's investment objectives and investor risk profile. Cassady Schiller Wealth Management will then evaluate the existing portfolio and develop a plan to transition the client to the desired portfolio. Cassady Schiller Wealth Management uses investment and portfolio allocation software to evaluate alternative portfolio designs. Cassady Schiller Wealth Management will then regularly monitor the client's portfolio holdings and the overall asset allocation strategy and hold review meetings with the client regarding the account as necessary.

Cassady Schiller Wealth Management will typically create a portfolio of no-load mutual funds, and may use model portfolios if the models match the client's investment objectives and risk tolerance. Cassady Schiller Wealth Management will allocate the client's assets among various investments taking into consideration the overall management style selected by the client. Cassady Schiller Wealth Management primarily recommends portfolios consisting of passively managed asset class and index mutual funds. Cassady Schiller Wealth Management primarily recommends mutual funds offered by Dimensional Fund Advisors (DFA). DFA sponsored mutual funds follow an academically based asset class investment philosophy with low holdings turnover. Consequently, the DFA fund fees are generally lower than fees and expenses charged by other types of funds. Client portfolios may also include some individual equity securities in situations where disposition of these securities would present an overriding tax implication or the client specifically requests they be retained for a personal reason. Cassady Schiller Wealth Management manages mutual fund and equity portfolios on a discretionary basis.

Cassady Schiller Wealth Management will often recommend an investor roll over plan assets to an IRA, due to there usually being a wider array of investment options available and lower cost options. However, there is a potential conflict of interest because Cassady Schiller Wealth Management would earn a fee based on the value of the IRA account under management. In contrast, if a client or prospective client left his or her plan assets with his/her former employer or roll the assets to a plan sponsored by a new employer there would be no compensation to Cassady Schiller Wealth Management.

Cassady Schiller Wealth Management may also recommend fixed income portfolios to investment management clients, which consist of individual bonds and or bond mutual funds. Cassady Schiller Wealth Management will request discretionary authority from investment management clients to manage fixed income portfolios. Discretionary authority may be necessary to enable Cassady Schiller Wealth Management to purchase assets in a timely manner when they are available at quoted prices.

On an ongoing basis, Cassady Schiller Wealth Management will answer clients' inquiries regarding their accounts and periodically review with clients the performance of their accounts. Cassady Schiller Wealth Management will periodically, and at least annually, review clients' investment strategy, risk profile and to discuss the re-balancing of each client's accounts to the extent appropriate.

In addition to managing the client's investment portfolio, Cassady Schiller Wealth Management may consult with clients on various financial areas including income and estate tax planning, business sale structures, college financial planning, retirement planning, insurance analysis, personal cash flow analysis, establishment and design of retirement plans and trust designs, among other topics.

## **RETIREMENT PLANS AND PLAN PARTICIPANTS**

Cassady Schiller Wealth Management provides advisory services to participant-directed employee retirement benefit plans. Cassady Schiller Wealth Management will analyze the plan's current investment platform, and assist the plan in creating an investment policy statement defining the types of investments to be offered and the restrictions that may be imposed. Cassady Schiller Wealth Management will recommend investment options to achieve the plan's objectives, provide participant education meetings, and monitor the performance of the plan's investment vehicles.

Cassady Schiller Wealth Management will recommend changes in the plan's investment vehicles as may be appropriate from time to time. Cassady Schiller Wealth Management generally will review the plan's investment vehicles and investment strategy as necessary.

## **FINANCIAL PLANNING SERVICES (STAND ALONE)**

Cassady Schiller Wealth Management sometimes provides advice in the form of a Financial Plan. Clients purchasing this service will receive a written financial plan, providing the client with recommendations tailored to their stated financial goals and objectives. In general, the financial plan will address any or all of the following areas of concern:

- **PERSONAL:** Family records, budgeting, personal liability, estate information and financial goals.
- **EDUCATION:** Education IRAs, financial aid, state savings plans, grants and general

assistance in preparing to meet dependent's continuing educational needs through development of an education plan.

- **TAXES & CASH FLOW:** Income tax and spending analysis and planning for past, current and future years. Cassady Schiller Wealth Management may illustrate the impact of various investments and recommendations on a client's current income tax and future tax liability.
- **DEATH & DISABILITY:** Cash needs at death, income needs of surviving dependents, estate planning review and disability income analysis.
- **RETIREMENT:** Analysis of current strategies and investment plans to help the client achieve his or her retirement goals.
- **INVESTMENTS:** Analysis of investment alternatives and their effect on the portfolio.

Cassady Schiller Wealth Management gathers required information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals and attitudes towards risk. Related documents supplied by the client are carefully reviewed and a written report is typically prepared.

A client is under no obligation to act on Cassady Schiller Wealth Management's financial planning recommendations. Should a client choose to implement the recommendations in the plan, they are under no obligation to implement the financial plan through any of Cassady Schiller Wealth Management's services. Cassady Schiller Wealth Management suggests the client work closely with his/her attorney, accountant or insurance agent. Implementation of financial plan recommendations is entirely at the client's discretion. If a client does choose to implement the plan using Cassady Schiller Wealth Management, Cassady Schiller Wealth Management may offset a portion of, or waive the cost of, the financial planning services.

As of December 2017, CSWM manages a total of \$204,605,841.00 wherein \$191,079,426.00 under discretionary basis and \$13,526,415.00 under non-discretionary basis.

## Item 5 – Fees and Compensation

### INVESTMENT MANAGEMENT SERVICES

The annual fee will be charged as a percentage of assets under management, according to the schedule below:

<b><u>Assets Under Management</u></b>	<b><u>Annual Fee (%)</u></b>
\$0 - \$1,000,000	1.00%
Next \$1,000,000	.80%
Next \$3,000,000	.60%
Next \$5,000,000	.45%
All funds thereafter	.30%

This fee schedule became effective March 31, 2018. Some clients with established relationships prior to that date may be subject to a different fee schedule. At our discretion, we may negotiate a client's fee schedule on a case-by-case basis. All fees will be clearly set forth in a client's written agreement with Cassady Schiller Wealth Management at the beginning of the relationship and any changes in the future will be clearly communicated.

On a case by case basis, we may exclude certain holdings from our fee schedule, such as cash, individual stocks, etc. If there is no charge on cash for example, this could be considered a conflict of interest, as the advisor will receive more compensation for keeping assets invested.

Cassady Schiller Wealth Management will generally bill its fees on a quarterly basis. Clients will be billed in advance each calendar quarter, based on the market value of the account at the end of the prior quarter. Clients may elect to be billed directly for fees or to authorize Cassady Schiller Wealth Management to directly debit fees from client accounts. Fees will not be prorated for each capital contribution and withdrawal made during the applicable calendar quarter. Accounts terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Cassady Schiller Wealth Management's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Cassady Schiller Wealth Management's fee. Cassady Schiller Wealth

Management shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that Cassady Schiller Wealth Management considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

## **RETIREMENT PLANS AND PLAN PARTICIPANTS**

The annual fee for employee benefit retirement plan services will be charged as a percentage of assets within the plan. Typically, the annual fee will range from .25% to .75%, depending on plan size and complexity for investment management services.

For investment management & employee benefit plan services, clients will be invoiced in advance at the beginning of each calendar quarter based upon the value (market value based on independent third party sources or fair market value in the absence of market value; client account balances on which Cassady Schiller Wealth Management calculates fees may vary from account custodial statements based on independent valuations and other accounting variances, including mechanisms for including accrued interest in account statements) of the client's account at the end of the previous quarter.

Cassady Schiller Wealth Management will request authority from the client to receive quarterly payments directly from the client's account held by an independent custodian. Clients may provide written limited authorization to Cassady Schiller Wealth Management to withdraw fees from the account. Clients will receive custodial statements showing the advisory fees debited from their account(s).

A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

All fees paid to Cassady Schiller Wealth Management for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. A client could invest in mutual funds directly, without the services of Cassady Schiller Wealth Management. In that case, the client would not receive the services provided by Cassady Schiller Wealth Management which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. DFA funds also may not be available to the client directly. Accordingly, the client should review both the fees charged by the funds and the fees charged by Cassady Schiller Wealth Management to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.



## **FINANCIAL PLAN SERVICES**

Financial planning fees will be charged as a fixed fee, typically ranging from \$2,500 to \$5,000, but could be higher, depending on the nature and complexity of each client's circumstances. On a case by case basis, Cassidy Schiller Wealth Management may forgo a fixed fee and charge an hourly rate to be determined by the client and Cassidy Schiller Wealth Management. Hourly rates range from \$100 to \$350 per hour, based on the nature and complexity of the engagement and the associated professional of the firm who is providing the service. Any hourly fees will be billed periodically as services are performed. All fees will be clearly set forth at the beginning of the relationship and any changes in the future will be clearly communicated. Financial planning fees will be paid upon completion.

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

Cassady Schiller Wealth Management does not charge any performance based fees or participate in side-by-side management. Performance-based fees are fees based on a share of capital gains on or capital appreciation of the assets of a client. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

## **Item 7 – Types of Clients**

Cassady Schiller Wealth Management provides portfolio management services to individuals, high net worth individuals, corporations, trusts, corporate pension and profit-sharing plans, charitable institutions and foundations.

Cassady Schiller Wealth Management generally requires a minimum account size of \$500,000 for Investment Management Services. Cassady Schiller Wealth Management retains the discretion to reduce or waive these minimums based upon individual client circumstances (e.g., the nature of current investments, future contributions by client to account, etc.)

All accounts for members of the client's family (husband, wife and dependent children) or related businesses may be assessed fees based on the total balance of all accounts.

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

Cassady Schiller Wealth Management's security analysis is based on a number of factors including those derived from commercially available software technology, securities rating services, general market and financial information and specific investment analysis that clients may request.

Cassady Schiller Wealth Management's main sources of information include commercially available investment services, financial newspapers, periodicals and issuer-prepared information. Cassady Schiller Wealth Management's investment advice is based on long-term investment strategies incorporating the principles of Modern Portfolio Theory.

Cassady Schiller Wealth Management's investment approach is firmly rooted in the belief that markets are efficient and that investor's returns are determined principally by asset allocation decisions, not by market timing or stock picking. Cassady Schiller Wealth Management focuses on developing diversified portfolios, principally through the use of passively managed, asset class mutual funds that are available only to institutional investors and clients of a network of selected investment advisors. Cassady Schiller Wealth Management may also recommend the use of long-term investment techniques such as dollar-cost averaging.

**Investing in securities involves risk of loss that clients should be prepared to bear.**

## **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Cassidy Schiller Wealth Management or the integrity of Cassidy Schiller Wealth Management's management. Our firm and our management personnel have no reportable disciplinary events to disclose.

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

Cassady Schiller Wealth Management is a registered investment adviser. However, the Partners of Cassady Schiller Wealth Management, Michael Clark, and James Mc Grath are also Partners of the accounting firm, Cassady Schiller CPAs and Advisors. Cassady Schiller CPAs and Advisors (hereinafter “Cassady Schiller”) may recommend Cassady Schiller Wealth Management to accounting clients in need of advisory services. Cassady Schiller Wealth Management may recommend Cassady Schiller to advisory clients in need of accounting services.

Accounting services provided by Cassady Schiller are separate and distinct from the advisory services of Cassady Schiller Wealth Management, and separate fees are charged for these services. No Cassady Schiller Wealth Management client is obligated to use Cassady Schiller for any accounting services.

Michael Clark spends up to 20% of his business time on his accounting practice.

James McGrath spends up to 10% of his business time on the accounting practice.

Mr. Clark, in his individual capacity, is also an independent insurance agent licensed to sell life insurance. Mr. Clark may advise clients regarding life insurance and would receive a commission on the sale of insurance products. No advisory client is obligated to purchase insurance from Mr. Clark. While this individual endeavors at all times to put the interest of the clients first as part of Cassady Schiller Wealth Management's fiduciary duty, clients should be aware that the receipt of commissions create a conflict of interest each time he recommends an insurance product. The implementation of any or all recommendations is solely at the discretion of the client.

## **Item 11 – Code of Ethics**

Cassady Schiller Wealth Management has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. Cassady Schiller Wealth Management's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients and sets forth Cassady Schiller Wealth Management's practice of supervising the personal securities transactions of employees with access to client information. Individuals associated with Cassady Schiller Wealth Management may buy or sell securities for their personal accounts identical or different than those recommended to clients. It is the expressed policy of Cassady Schiller Wealth Management that no person employed by the firm shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on investment decisions of advisory clients.

To supervise compliance with its Code of Ethics, Cassady Schiller Wealth Management requires that anyone associated with this advisory practice with access to advisory recommendations provide annual securities holding reports and quarterly transaction reports to the firm's Chief Compliance Officer, (CCO). Cassady Schiller Wealth Management also requires such access persons to receive approval from the Chief Compliance Officer prior to investing in any IPO's or private placements. Cassady Schiller Wealth Management's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information and protecting the confidentiality of client information.

Cassady Schiller Wealth Management requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to discipline.

Cassady Schiller Wealth Management will provide a complete copy of its Code of Ethics to any client upon request.

## **Item 12 – Brokerage Practices**

Cassady Schiller Wealth Management participates in the Schwab Institutional (SI) services program offered to independent investment advisers by Charles Schwab & Company, Inc. Schwab is a registered broker dealer.

The Schwab brokerage program will generally be recommended to advisory clients for the execution of mutual fund and equity securities transactions. Cassady Schiller Wealth Management regularly reviews these programs to ensure that its recommendations are consistent with its fiduciary duty. These trading platforms are essential to Cassady Schiller Wealth Management's service arrangements and capabilities, and Cassady Schiller Wealth Management may not accept clients who direct the use of other brokers. As part of these programs, Cassady Schiller Wealth Management receives benefits that it would not receive if it did not offer investment advice.

Charles Schwab Institutional (SI) provides Cassady Schiller Wealth Management with access to institutional trading and custody services, which are typically not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis at no charge to them.

The services include brokerage, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. SI also make available to Cassady Schiller Wealth Management other products and services that benefit Cassady Schiller Wealth Management but may not benefit its clients' accounts.

Some of these other products and services assist Cassady Schiller Wealth Management in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of Cassady Schiller Wealth Management's fees from its clients' accounts, and assist with back-office functions, recordkeeping and client reporting.

Many of these services generally may be used to service all or a substantial number of Cassady Schiller Wealth Management's accounts. Recommended brokers also make available to Cassady Schiller Wealth Management other services intended to help Cassady Schiller Wealth Management manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. Cassady Schiller Wealth Management does not, however, enter into any commitments with the brokers for transaction levels in exchange for any services or products from brokers.



While as a fiduciary, Cassady Schiller Wealth Management endeavors to act in its clients' best interests, Cassady Schiller Wealth Management's requirement that clients maintain their assets in accounts at SI may be based in part on the benefit to Cassady Schiller Wealth Management of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the brokers, which may create a potential conflict of interest.

Cassady Schiller Wealth Management also receives software from Dimensional Fund Advisors (DFA), which Cassady Schiller Wealth Management utilizes in forming assets allocation strategies and producing performance reports. DFA also provides continuing education for Cassady Schiller Wealth Management personnel. These services are designed to assist Cassady Schiller Wealth Management plan and design its services for business growth.

As Cassady Schiller Wealth Management will not request the discretionary authority to determine the broker dealer to be used or the commission rates to be paid for mutual fund and equity securities transactions, clients must direct Cassady Schiller Wealth Management as to the broker dealer to be used. In directing the use of a particular broker or dealer, it should be understood that Cassady Schiller Wealth Management will not have authority to negotiate commissions among various brokers or obtain volume discounts, and best execution may not be achieved. Not all investment advisers require clients to direct the use of specific brokers.

Notwithstanding the above directed brokerage arrangements, for certain fixed income portfolios and transactions, Cassady Schiller Wealth Management may request that it be provided with written authority to determine the broker dealer to use for client transactions and the commissions costs that will be charged to clients for these transactions. Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change/amend these limitations as required. Such amendments shall be submitted in writing. For these fixed income transactions, Cassady Schiller Wealth Management assesses the quality of broker dealer services and client fixed income transactions, and approve the selection of those brokers or dealers which will provide the best services at the lowest commission rates or cost possible. The reasonableness of brokerage costs, commissions and mark-up/mark-downs is based on the broker dealer's ability to provide professional services, competitive execution, and other services that will help Cassady Schiller Wealth Management in providing investment management services to clients.

SI does not generally charge clients a custody fee and is compensated by account holders through commissions or other transaction related fees for securities trades that are executed through the broker or that settle into the clients' accounts at the brokers. Trading client accounts through other brokers may result in fees (including mark-ups and mark-downs) being charged by the custodial broker and an additional broker.

When trading clients' accounts, errors may periodically occur. In all circumstances involving trade errors, clients are "made whole." For clients utilizing Schwab for custodial and brokerage services, trade errors are corrected through Schwab Institutional. Cassady Schiller Wealth Management trade errors that are corrected through Schwab Institutional and result in losses under \$100 are covered by Schwab. Cassady Schiller Wealth Management trade errors that result in gains less than \$100 are kept by Schwab to minimize and offset its administrative time and expense. Trade errors that Schwab corrects on behalf of Cassady Schiller Wealth Management and result in gains over \$100 are donated by Schwab to a charity of its choosing or in certain situations, Cassady Schiller Wealth Management trade errors that may financially benefit a Client and can be corrected in a Client account without creating regulatory restrictions, will be corrected directly in the Client's account. Subject to Schwab Error Desk approval, Cassady Schiller Wealth Management trade error gains & losses may be netted against each other if errors occur on the same trade date, or in some instances, within a few days of each other. Cassady Schiller Wealth Management has the responsibility to effect orders correctly, promptly and in the best interests of our clients. In the event, any error occurs in the handling of any client transactions, due to Cassady Schiller Wealth Management's actions, or inaction, or actions of others, Cassady Schiller Wealth Management's policy is to seek to identify and correct any errors as promptly as possible without disadvantaging the client or benefiting Cassady Schiller Wealth Management in any way.

Cassady Schiller Wealth Management may block trades where possible and when advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple clients' accounts so long as transaction costs are shared equally and on a pro-rata basis between all accounts included in any such block. Block trading allows Cassady Schiller Wealth Management to execute equity trades in a timelier, equitable manner and to reduce overall commission charges to clients. To the extent that Cassady Schiller Wealth Management determines to aggregate client orders for the purchase or sale of securities, no advisory client will be favored over any other client. Generally, each client that participates in an aggregated order will participate at the average share price for all transactions in a given block in a given security on a given business day, with transactions costs shared pro-rata based on each client's participation in the transaction. Cassady Schiller Wealth Management shall not receive any additional compensation or remuneration as a result of the aggregation.

Cassady Schiller Wealth Management does not have any arrangements to compensate any broker dealer for client referrals.

## **Item 13 – Review of Accounts**

### **INVESTMENT MANAGEMENT SERVICES:**

Account assets are supervised periodically and formally reviewed at least annually by Michael Clark, James McGrath, Brad Schueler or Marc Wambaugh. The review process contains each of the following elements:

- a. assessing client goals and objectives;
- b. evaluating the employed strategy(ies);
- c. monitoring the portfolio(s); and
- d. addressing the need to rebalance.

Additional account reviews may be triggered by any of the following events:

- a. a specific client request;
- b. a change in client goals and objectives;
- c. an imbalance in a portfolio asset allocation; and d. market/economic conditions.

### **RETIREMENT PLAN AND PLAN PARTICIPANT SERVICES:**

Retirement plan assets are reviewed no more than quarterly, and according to the standards and situations described above for investment management accounts.

### **FINANCIAL PLANNING SERVICES:**

Financial Planning accounts/clients will be reviewed as contracted for at the inception of the advisory relationship.

### **REGULAR REPORTS PROVIDED TO CLIENTS (Also see item 15)**

#### **INVESTMENT MANAGEMENT SERVICES:**

All clients will receive quarterly performance reports, prepared and reviewed by Cassady Schiller Wealth Management, that summarize the client's account and asset allocation. Clients will also receive monthly statements from their account custodian, which will outline the client's current positions and current market value.

#### **RETIREMENT PLAN AND PLAN PARTICIPANT SERVICES:**

Employee Benefit Plan clients generally receive statements only from their account custodian.

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

Cassady Schiller Wealth Management does not have any formal client referral or other compensation program.

## **Item 15 – Custody**

When Cassady Schiller Wealth Management deducts fees directly from client accounts at a selected custodian, Cassady Schiller Wealth Management will be deemed to have limited custody of client's assets and must have written authorization from the client to do so.

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian (ie. Charles Schwab) that holds and maintains client's investment assets. Cassady Schiller Wealth Management urges you 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.

## **Item 16 – Investment Discretion**

Cassady Schiller Wealth Management usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Cassady Schiller Wealth Management observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, Cassady Schiller Wealth Management's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to Cassady Schiller Wealth Management in writing.

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

Proxy Disclosures: As a matter of firm policy and practice, Cassidy Schiller Wealth Management does not accept the authority to and does not vote proxies on behalf of advisory client. For any pension plan or other employee benefit plan governed by ERISA, the right and responsibility to vote proxies has been expressly reserved to the plan trustees or other plan fiduciary. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Cassidy Schiller Wealth Management, however, may provide advice to clients regarding the clients' voting of proxies.

**Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about their financial condition, if applicable. Cassidy Schiller Wealth Management 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.