



**Mackey Komara  
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Wealth Coaches

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This wrap fee program brochure provides information about the qualifications and business practices of Mackey Komara & Dankovich, LLC. If you have any questions about the contents of this brochure, please contact us at (248) 418-5100 or [john@mkdwealthcoach.com](mailto:john@mkdwealthcoach.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.

We are a registered investment adviser. Registration of an adviser does not imply any level of skill or training.

Additional information about us also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **SUMMARY OF MATERIAL CHANGES**

This Brochure is an appendix to our Form ADV Part 2A Brochure. This Section is a new requirement under the “Amendments to Form ADV” which was published by the SEC on July 28, 2010. This Brochure dated March 28, 2011 is a new document prepared according to the SEC’s new requirements and rules. As such, this Brochure is materially different in structure and requires certain new information that we were not required to include in our previous brochure. We recommend that you read our entire Brochure.

In the future, this Section will discuss only specific material changes (including a summary of those changes) that we made to our Brochure since the last annual update of our Brochure. At that time, we will also reference the date of our last annual update of our Brochure.

In the past we offered to deliver or have delivered information about our qualifications and business practices to clients on at least an annual basis. As required by the new SEC rules, we will ensure that clients receive a summary of any material changes to this and subsequent Brochures within one hundred twenty (120) days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary, including a new Brochure based on changes or new information, at any time, without charge.

Currently, you may request a copy of our Brochure by contacting John Dankovich, our Chief Compliance Officer, at (248) 418-5100 or [john@mkdwealthcoach.com](mailto:john@mkdwealthcoach.com).

Additional information about us 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 us who are registered, or are required to be registered, as one of our investment adviser representatives of our firm.

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## **SERVICES, FEES AND COMPENSATION**

### **Our Services**

The purpose of this Brochure is to describe the wrap fee program we provide under our proprietary investment management service that we call Responsive Investment Strategies<sup>®</sup> or RIS<sup>®</sup>. A wrap fee program is an investment program where you would pay us, as the sponsor of the program, a single fee which covers the costs of investment management, brokerage, custody and any other services provided under the program. The RIS<sup>®</sup> program fees, minimum account requirements and additional information about our firm are described in more detail below.

RIS<sup>®</sup> is a protect and advance philosophy designed to respond to changing markets with a sell side discipline. We use technical and fundamental factors to maintain a focus on short-term, intermediate-term and long-term market direction. Our decisions are based on a disciplined, trend-following approach to rationally view the cyclical nature, patterns of returns and volatility of the financial markets. We offer six strategies within RIS<sup>®</sup>: RIS<sup>®</sup> Short Term Income Instruments, RIS<sup>®</sup> Tax Managed Income Strategy, RIS<sup>®</sup> Bond Strategy, RIS<sup>®</sup> Market Strategy, RIS<sup>®</sup> Tactical Strategy and RIS<sup>®</sup> Multi-Asset Growth Strategy.

If you choose to participate in RIS<sup>®</sup>, you will sign a Discretionary Investment Advisory Agreement with us which establishes the general terms and conditions of our engagement. We discuss your financial needs, financial goals and objectives, risk tolerance and other individual circumstances with you to determine which strategy will meet your investment objectives. Under our agreement, you grant us the ability to determine, without obtaining your specific consent, the securities to be bought or sold for your account(s) and the amount of securities to be bought or sold. However, we exercise such discretion in a manner consistent with your stated investment objectives for the account and by considering the size of your account and your risk tolerance. Also, you may impose reasonable restrictions, in writing, on our discretionary authority or place limitations on the types of investments for your account. You must notify us promptly if there are ever any changes in your financial situation or investment objectives or if you wish to impose any reasonable restrictions upon our management services.

## **Our Fees**

Our general annual fee schedules are as follows:

### **Investment**

#### **Strategy:**

	<b><u>\$0-1m</u></b>	<b><u>\$1-2m</u></b>	<b><u>\$2-5m</u></b>	<b><u>\$5-10m</u></b>	<b><u>\$10m+</u></b>
	<b>First \$1m</b>	<b>Next \$1m</b>	<b>Next \$3m</b>	<b>Next \$5m</b>	
RIS <sup>®</sup> Short Term Income Instruments	0.65%	0.45%	0.35%	0.25%	0.15%
RIS <sup>®</sup> Strategies**	1.95%	1.50%	1.25%	0.45%	0.35%

### **Investment**

#### **Strategy:**

	<b><u>\$0-500k</u></b>	<b><u>\$500k-1m</u></b>	<b><u>\$1-5m</u></b>	<b><u>\$5m+</u></b>
	<b>First \$500k</b>	<b>Next \$500k</b>	<b>Next \$4m</b>	
RIS <sup>®</sup> Tactical	1.25%	0.75%	0.65%	0.45%

\*\* Includes Bond, Market, Tax Managed Income, and Multi-Asset Growth Strategies.

We charge our fee quarterly, in advance, based upon a percentage of the market value of the assets in your account(s) under our management. Our fee includes brokerage commissions, transaction fees, and other related costs and expenses. We prorate the fee for your initial quarter starting the day your assets are designated for our management. Our fee varies depending upon the investment strategy and market value of the assets under management.

Cash and short-term income instruments held inside of a RIS<sup>®</sup> Strategy are billed at the RIS<sup>®</sup> Strategies Fee. The fee schedule breakpoints apply to the amount in each strategy group. Assets in different strategy groups are not aggregated to determine fees. We may, in our sole discretion, negotiate to charge a lesser management fee based upon certain criteria, such as client longevity, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, or pro bono activities.

You may make additions to and withdrawals from your account at any time. Additions may be in cash or securities provided that we reserve the right to liquidate any transferred securities, or decline to accept particular securities into your account. If you deposit assets into or withdraw assets from an account after the beginning of a quarter, since we bill our fees at the beginning of the quarter, we do not adjust or prorate our fee for that quarter based upon your addition or withdrawal of assets. You may withdraw assets from your account by contacting us and we will provide the appropriate paperwork required by the custodian to initiate a withdrawal. Any withdrawal is subject to the custodian's usual and customary securities settlement procedures.

We design our portfolios as long-term investments and asset withdrawals may impair the achievement of your investment objectives. We may consult with you about your options and ramifications of transferring securities. You should be aware that when transferred securities are

liquidated, you may incur transaction fees, fees assessed at the mutual fund level (i.e., contingent deferred sales charge) and/or taxes. You are responsible for any transaction costs or fees, or taxes due in connection with the liquidation of investment positions to facilitate cash or asset withdrawals.

### **Direct Billing**

Generally, you authorize us in the Discretionary Investment Advisory Agreement to invoice your custodian directly for our fees and to direct your custodian to deduct our fees from your account. You will receive periodic statements from your custodian showing all amounts disbursed from the account, including our fee. You may withdraw this authorization for direct billing of our fee at any time by notifying us or your custodian in writing.

Our advisory fees are paid directly to Cambridge Investment Research, Inc., a broker-dealer. Several of our investment advisory representatives are also registered representatives of Cambridge and we pay Cambridge for compliance and oversight services. Cambridge deducts any fees we owe to Cambridge and then forwards the remaining advisory fees to us.

### **Fee Comparison**

Our fee includes such services as portfolio management (stock, bond and mutual fund analysis, market analysis, asset allocation decisions, etc.), execution of various securities (mutual funds, ETFs stocks, bonds, etc.), the custodian's monthly reports, account servicing, and continuous account management. Participation in RIS<sup>®</sup> may cost you more or less than purchasing these services separately. The portfolio size and amount, number of transactions made in your account, as well as the commissions charged for each transaction, will determine the relative cost of RIS<sup>®</sup> versus paying for executions on a per transaction basis and paying a separate fee for advisory services. Our fee may be higher or lower than fees charged by other sponsors of comparable investment advisory programs.

### **Other Fee and Charges**

In addition to our fee, you may incur other fees and charges imposed by third-parties, including, but are not limited to, fees charged by your custodian, fund management and other fees imposed directly by a mutual fund purchased in your account as disclosed in the fund's prospectus, certain deferred sales charges on previously purchased mutual funds, transfer taxes, wire transfer and electronic fund fees, check writing fees, SEC expenses on securities transactions, custodial termination fees, and other fees and taxes on brokerage accounts and securities transactions.

### **Aggregation of Orders**

We may aggregate orders for securities transactions such that all of our client accounts invested in accordance with the same RIS<sup>®</sup> program will be traded in a block trade. In doing so, we strive to treat each of our clients fairly and will not favor one of our clients over another. Each account that participates in an aggregated order will participate at the average share price

for all transactions ordered by us in that security on a given business day. If an aggregated order is not filled in its entirety, it may be allocated among participating accounts on a pro rata basis. However, if the partial fill is determined to be inappropriate for an account such that the number of shares for a particular account would be too few to warrant the investment (or result in partial shares), then the shares will not be allocated to that account.

We will not aggregate orders for a client having a directed brokerage relationship with a client who does not have a directed brokerage relationship with the same broker-dealer. A consequence of not aggregating your order with other orders for the same securities is that you may not obtain as good a price or as low a cost in a separate transaction as clients whose orders have been aggregated.

We have 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 our actions or inaction, our policy is to seek to identify and correct any errors as promptly as possible without disadvantaging the client or benefiting us in any way. If the error is our responsibility, any client transaction will be corrected and we will be responsible for any client loss resulting from an inaccurate or erroneous order. If a gain results from the trade error, we retain the gain in our trade error account.

### **Termination**

Our agreement with you continues until one of us terminates the agreement by providing the other party with thirty (30) days written notice. We prorate our fees through the date of termination and we charge or refund you any outstanding balance, as appropriate, in a timely manner.

## **ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS**

### **Account Requirements**

To open accounts with us, we require you to place a minimum of \$500,000 of assets in your aggregate portfolios under our management. We also impose certain conditions for opening and maintaining an account in RIS<sup>®</sup>. Our minimum account sizes vary depending on the strategy, as follows: RIS<sup>®</sup> Short Term Income Instruments is \$2,500; RIS<sup>®</sup> Bond and Tax Managed Income Strategies are \$30,000; RIS<sup>®</sup> Market Strategy is \$50,000 and RIS<sup>®</sup> Multi-Asset Growth Strategy is \$300,000. We may waive this requirement if, for example, you have additional or related accounts that together exceed the minimum requirements.

We do not charge a minimum annual fee for any of our RIS<sup>®</sup> strategies.

### **Types of Clients**

We provide services to individuals, corporate pension and profit-sharing plans, trusts, estates, charitable institutions, and other corporations and business entities.

## **PORTFOLIO MANAGER SELECTION AND EVALUATION**

### **Advisory Business**

We are the portfolio manager for all accounts in the RIS<sup>®</sup> program. We also offer financial planning, investment management services for qualified retirement plans through our 401(k) plan, as well as investment management regarding annuity products, individual bonds and/or cash and equivalents that you may own or your individual employer-sponsored retirement plans. We offer our services on a fee basis, and depending on the type of service, we charge an asset based fee, hourly rate or fixed fee. For additional information regarding these services and our fees, you may request a copy of the Part 2A of our Form ADV by contacting John Dankovich, our Chief Compliance Officer, at (248) 418-5100 or [john@mkdwealthcoach.com](mailto:john@mkdwealthcoach.com).

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

We do not charge you any performance-based fees, which are fees based on a share of capital gains on or capital appreciation of your assets.

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

#### ***Method of Analysis***

We primarily utilize technical analysis to evaluate potential investments. Unlike fundamental analysis, technical analysis does not analyze the company's value, but instead analyzes the stock's price movement in the market. Charting is a form of technical analysis in which the various technical factors are diagrammed in order to illustrate patterns. Technical analysis studies the supply and demand in the market in an attempt to determine what direction, or trend, will continue in the future. However, there are risks involved with this method, including the risk that the trends will change unpredictably, which is why we use a combination of methods and obtain information from a variety of sources.

We also employ fundamental analysis as supporting and supplemental data in evaluating potential investments. Fundamental analysis is a technique that attempts to determine a security's value by focusing on the economic well-being of a financial entity as opposed to only its price movements. When conducting fundamental analysis, we may review various documents, annual reports, SEC filings, and company press releases for factors including, but not limited to, whether the company's revenue is growing, if the company is profitable, if the company is in a strong enough position to beat its competitors in the future, and if the company is able to repay its debts. Because it can take a long time for a company's value to be reflected in the market, the risk associated with this method of analysis is that a gain is not realized until the stock's market price rises to the company's true value.

We obtain information from a number of sources, both public and by purchase, including financial newspapers and magazines, inspections of corporate activities, research materials prepared by third-parties, timing services, corporate rating services, annual reports, prospectuses



and filings with the SEC, company press releases, and information from a client's Independent Manager (when applicable). We believe these resources for information are reliable and regularly depend on these resources for making our investment decisions; however, we are not responsible for the accuracy or completeness of this information.

### ***Investment Strategies***

We use a variety of investment strategies depending on your circumstances and needs. We may recommend implementing one or more of the following investment strategies: long-term purchases (held at least a year), short term purchases (held less than a year), trading (held less than thirty (30) days), margin transactions (purchase of a security on credit extended by a securities company), and option writing (selling an option).

We may recommend implementing these strategies using stocks, bonds, mutual funds (held directly or held within variable annuities or life insurance products), exchange traded funds, municipal securities, options contracts, futures contracts and other types of investments. We often recommend mutual funds of different kinds to promote portfolio diversification within various asset classes, such as industry sectors, domestic/international, or equities/bonds. We may recommend periodic purchases, sales, and exchanges of those mutual fund shares within mutual fund families and between different mutual fund families when there are changes in your financial needs, market conditions, or economic developments.

### ***Types of Investments and Risk of Loss***

You should be prepared to bear the risk of loss when you invest in securities. Obtaining higher rates of return on investments typically entails accepting higher levels of risk. We will work with you to attempt to identify the balance of risks and rewards that is appropriate and comfortable for you. However, it is still your responsibility to ask questions if you do not understand fully the risks associated with any investment or investment strategy.

Also, while we strive to render our best judgment on your behalf, many economic and market variables beyond our control can affect the performance of your investments and we cannot assure you that your investments will be profitable or that no losses will occur in your investment portfolio. Past performance is one consideration with respect to any investment or investment advisor, but it is not a predictor of future performance.

We offer advice about a wide variety of investment types, including mutual funds, index funds, ETFs, corporate debt, government and municipal securities, fixed and variable annuities, option contracts on securities, futures, and interests in partnerships investing in real estate and oil and gas investments, each having different types and levels of risk. We will discuss these risks with you in determining the investment objectives that will guide our investment advice for your account. We will explain and answer any questions you have about these kinds of investments, which present special considerations such as the following:

### ***Mutual Funds, Index Funds and Exchange Traded Funds***

Mutual funds and ETFs typically charge their shareholders various advisory fees and expenses associated with the establishment and operation of the funds. These fees will generally include a management fee, shareholder servicing, other fund expenses, and sometimes a distribution fee. If the fund also imposes sales charges, you may pay an initial or deferred sales charge. These separate fees and expenses are disclosed in each fund's current prospectus, which is available from the fund or we can provide it to you upon request.

Consequently, for any type of fund investment, it is important for you to understand that you are paying two levels of advisory fees and expenses: one layer of fees and expenses is paid at the fund level and one layer of advisory fees is paid to us. In addition, many mutual funds pay shareholder servicing fees (12b-1 fees) to brokerage firms and their registered representatives in consideration of their services to the fund's shareholders. However, if the mutual fund pays 12b-1 fees to any of our employees that are registered representatives for qualified plan accounts, we apply such fees to the offset plan administration fees for the plan participants. Also, we primarily recommend "no-load" mutual funds, which do not have a commission or sales charge because the shares are distributed directly by the investment company, instead of going through a secondary party. Generally speaking, most mutual funds may be purchased directly, without using our services and without incurring our advisory fees.

#### *Variable Annuities*

Variable annuities are highly complex financial products offered by insurance companies. Investment in a variable annuity contract is subject to both general market risk and the insurance company's credit risk. These and other risks are described in the variable annuities' prospectuses. Variable annuities are regulated under both securities and insurance laws and related rules and regulations. Variable annuities offer various benefits and features which may or may not have value to you depending on your circumstances, which we can discuss with you.

As described in more detail in the section titled "**Other Financial Industry Activities and Affiliations**" beginning on page 8, Joseph Mackey, Michael Komara and John Dankovich are licensed as registered representatives with Cambridge to sell general securities products such as variable annuity products and 529 plans. If you choose to purchase brokerage products from one of our principals in their capacity as a registered representative of Cambridge, you should be aware that they will receive compensation in connection with the sale of those products. To mitigate any conflict of interest, we do not charge you an annual fee on any brokerage products you purchase through Cambridge, and we do not share in any fees the registered representative receives in connection with the sale of a brokerage product.

#### **Voting Client Securities**

As a matter of firm policy and practice, we will not be responsible for responding to proxies that are solicited with respect to annual or special meetings of shareholders of securities held in your account. Proxy solicitation materials will be forwarded to you for response and voting.

## **CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS**

As the portfolio manager, our employee may have access to the information the client provides to us, including information regarding the client's financial information. Our firm has adopted a Privacy Policy, in accordance with Regulation S-P under section 504 of the Gramm-Leach-Bliley Act, which restricts the firm and our employees' use of and access to our clients' nonpublic personal information. Our employees only have access to client information on an "as needed" basis in order to service our RIS<sup>®</sup> clients. In order for us and our investment advisor representatives to effectively manage your account and assist you in meeting your financial objectives, you must update us as soon as possible when any changes to their personal or financial information occur.

We recognize and appreciate the importance of protecting your privacy, so we established policies to safeguard your confidential information that we obtain in connection with RIS<sup>®</sup>. We provide you a copy of our privacy policy notice before or at the same time that we sign the Discretionary Investment Advisory Agreement with you. You may obtain a complete copy of our Privacy Policy by contacting our John Dankovich, our Chief Compliance Officer, at (248) 418-5100 or [john@mkdwealthcoach.com](mailto:john@mkdwealthcoach.com).

## **CLIENT CONTACT WITH PORTFOLIO MANAGERS**

We are open Monday through Friday from 9 a.m. to 5 p.m. There are no restrictions on when you may contact or consult with us or our investment adviser representatives regarding RIS<sup>®</sup> or your account.

## **ADDITIONAL INFORMATION**

### **Disciplinary Information**

As a registered investment adviser, we must inform you of all material facts regarding any legal or disciplinary events that would be material to your evaluation of our firm or the integrity of our management. We have no legal or disciplinary events to disclose.

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

As previously mentioned, our principals and investment adviser representatives are also licensed as registered representatives with Cambridge. As registered representatives of Cambridge, our representatives may sell you variable annuity products and 529 plans. When you purchase or sell securities through Cambridge, Cambridge charges you commissions, fees, or other charges which are not part of our firm's advisory fees. Our representatives receive the normal and customary commission compensation in connection with your purchase of the specific product. The receipt of this commission may create a conflict of interest, which you should carefully consider when deciding to implement our advice. To mitigate this conflict, we do not charge an advisory fee with respect to any products you purchase from one of our rep-

representatives through Cambridge. Also, you may implement our investment advice through any broker-dealer or product sponsor of your choice. However, if you purchase a brokerage product from one of our principals or representatives, they must sell that product through Cambridge because that is the broker-dealer which holds their securities licenses.

Also, we are a licensed insurance agency. Our principals Messrs. Mackey, Komara and Dankovich are licensed insurance agents, in their individual capacities, and may recommend the purchase of certain insurance products. A conflict of interest exists to the extent that we recommend the purchase of insurance products where our principals receive insurance commissions or other additional compensation. However, to mitigate this conflict, if you decide to implement our recommendation to purchase insurance products you are not required to purchase insurance through our principals and you may purchase insurance products through another life insurance agency of your choice.

In December 2010, Fidelity Brokerage Services, LLC, a registered broker-dealer, loaned money to our firm. While this may create a conflict of interest when we are recommending Fidelity Management Trust Company to you as the broker-dealer for your account, we are still subject to our duty of best execution. Also, as set forth in that section, you are not required to use Fidelity Management Trust Company, and you may direct us to use another broker-dealer.

Mr. Dankovich is a licensed practicing attorney. Mr. Dankovich maintains a limited legal practice, separate and distinct from our firm. No portion of our services to you constitutes legal advice. Rather, you should consult with and seek the advice of your own attorney.

We are also required to inform you if we recommend or select other advisers for our clients and if we receive any compensation from those advisers. We do not recommend or select any other investment advisers for our clients.

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

We have adopted a code of ethics establishing standards of conduct for our firm and the persons associated with us which we call associated persons. Our code requires that our associated persons comply with applicable securities laws. In accordance with Section 204A of the Advisers Act, our code contains written policies reasonably designed to prevent the unlawful use of material non-public information by us or any of our associated persons. Our Code also requires that certain of our personnel who have access to confidential client information report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings.

Our associated persons may buy or sell securities for our own accounts, otherwise known as proprietary accounts, that we also recommend to you and other clients consistent with our policies and procedures. There may be many similarities in portfolio holdings among these proprietary accounts and your accounts. While this may create a conflict of interest, generally, orders for your account and our proprietary accounts are aggregated or “batched” into one large order in accordance with our trade aggregation and allocation policy described in more detail in

the “**Aggregation of Orders**” section above beginning on page 3. Aggregated orders may achieve better execution for all participating accounts and we fairly allocate those benefits among all participating accounts, which mitigates any potential conflict.

Also, when we are purchasing or selling or considering for purchase or sale any security on behalf of a client that is not part of an aggregated order, an access person cannot purchase or sell that same security before we complete purchase or until a decision has been made not to purchase or sell such security for our clients. These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers’ acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

You may request a copy of our code by contacting John Dankovich, our Chief Compliance Officer, at (248) 418-5100 or [john@mkdwealthcoach.com](mailto:john@mkdwealthcoach.com).

### **Review of Accounts**

We review investments in our RIS<sup>®</sup> Strategies or recommended mutual funds on an ongoing basis, and conduct a more formal review at least quarterly. Our investment adviser representatives conduct our client reviews. We monitor investments in your accounts on an ongoing basis and conduct regular account reviews at least annually. We recommend changes to holdings in your account as we deem necessary or appropriate.

We encourage you to discuss your financial needs, goals and objectives with us and to keep us informed of any changes. We contact you at least annually to review our previous services and make any necessary recommendations, as well as discuss the impact resulting from any changes in your financial situation and investment objectives.

You will receive confirmations of your purchases and sales and statements from your broker-dealer or custodian containing account information such as account value, transactions, and other relevant account information.

### **Client Referrals and Compensation**

We must disclose any economic benefits we or our investment advisory representatives receive for providing investment advice and other services to you. As described in the “**Other Financial Industry Activities and Affiliations**” section beginning on page 8, our principals and investment adviser representatives may receive additional compensation from Cambridge if they sell Cambridge brokerage products to you. Also, our principals, as licensed insurance agents, may receive commission when they sell insurance products to you. As we described above, while this may create a conflict of interest, we mitigate this conflict by not requiring you to purchase such securities products or life insurance through our affiliated agencies or

representatives, and you may purchase the products from another broker-dealer or insurance agency.

We must also inform you if we or a related person directly or indirectly compensate a third-party for referring clients to us. From time to time, we may engage solicitors to market our services. If we do so, you will receive a separate solicitor's disclosure brochure describing our solicitation arrangements, the compensation we pay to the solicitor, and the terms of that relationship. You will also receive a copy of this Brochure.

### **Financial Information**

As a registered investment adviser, we are required to provide clients with certain financial information or disclosures about our financial condition if we have financial commitments that impair our ability to meet contractual and fiduciary commitments to our clients. We have not been the subject of a bankruptcy proceeding and do not have any financial commitments that would impair our ability to meet any contractual or fiduciary commitments to our clients.

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