

# **Parkshore Wealth Management**

**3007 Douglas Blvd., Suite 150  
Roseville, CA 95661**

**tel: 916-797-3007**

**fax: 916-797-1747**

**[www.pwmadvisor.com](http://www.pwmadvisor.com)**

**February 18, 2016**

## **FORM ADV PART 2A BROCHURE**

This brochure provides information about the qualifications and business practices of Parkshore Wealth Management. If you have any questions about the contents of this brochure, please contact us at 916-797-3007. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Parkshore Wealth Management is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Parkshore Wealth Management's CRD number is 148052.

Parkshore Wealth Management is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

## Item 2 Summary of Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since our last annual updating amendment dated January 29, 2015, we have no material changes to report.

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## Item 4 Advisory Business

### Description of Services and Fees

Parkshore Wealth Management (PWM) is a comprehensive wealth management firm located in Roseville, California. Harold C Anderson CFP® is the only principal owner that owns more than 25% of the company. Parkshore Wealth Management has been in business since October 1, 2008.

Currently, we offer the following investment advisory services, which are personalized to each individual client:

- Portfolio Management Services
- Financial Planning Services
- Tax Preparation Services

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "we", "our" and "us" refer to Parkshore Wealth Management and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm.

### Portfolio Management Services

We offer discretionary and non-discretionary portfolio management services. Our investment advice is tailored to meet our clients' needs and investment objectives. If you retain our firm for portfolio management services, we will meet with you to determine your investment objectives, risk tolerance, and other relevant information at the beginning of our advisory relationship. We will use the information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice and/or to make investments on your behalf. As part of our portfolio management services, we may customize an investment portfolio for you according to your risk tolerance and investing objectives. We may also invest your assets using a predefined strategy, or we may invest your assets according to one or more model portfolios developed by our firm. Once we construct an investment portfolio for you, or select a model portfolio, we will monitor your portfolio's performance on an ongoing basis, and will rebalance the portfolio as required by changes in market conditions and your financial circumstances.

If you participate in our discretionary portfolio management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm and the appropriate trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased for your account) by providing our firm with your restrictions and guidelines in writing. If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account.

### Financial Planning Services

We offer financial planning services which typically involve providing a variety of advisory services to clients regarding the management of their financial resources based upon an analysis of their individual needs. These services range from either a broad, comprehensive, financial plan to our 'Accumulator' monthly planning packages.

If you retain our firm for financial planning services, we will meet with you to gather information about your financial circumstances and objectives. The initial meeting is called the discovery meeting and is complimentary. The discovery meeting is used to discuss your goals, objectives, concerns, and other related issues. We review your existing documents relating to your investments, tax returns, insurance policy documents, investment statements, and estate documents. We also use financial planning software to determine your current financial position and to define and quantify your long-term goals and objectives. Once we review and analyze the information you provide to our firm and the data derived from our financial planning software, we will deliver a written plan to you, designed to help you achieve your stated financial goals and objectives.

In addition to a full broad-based financial plan, we offer two types of monthly financial planning packages that include financial planning and portfolio management services. This service, called our 'Young Accumulator' is designed for clients with investable assets of less than \$100,000. The fees for the Young Accumulator packages are based on monthly fixed fees rather than a lump sum or variable percentage. The services provided under each package are listed below:

<b>Package Details</b>	<b>\$100/Month</b>	<b>\$150/Month</b>
Basic Financial Plan*	Yes	Yes
Access to Client Portal	Yes	Yes
TDA Access (Includes Research Capabilities)	Yes	Yes
MoneyGuidePro	Yes	Yes
TM Access (1Year)	Yes	Yes
FinaMetrica	Yes	Yes
® Risk Tolerance Questionnaire	Yes	Yes
Hours of Annual Support**	2	4
Number of Supported Investment Accounts	2	4
Tax Preparation***	\$150	Yes
Option to Purchase	\$400 Per	\$300 Per
Additional Support Hours	4-Hour Block	4-Hour Block
Option to Add	\$15 Per Month	\$15 Per Month
Additional Investment Accounts	Per Account	Per Account

\*Management with no fees, intended for clients with less than \$100,000.

\*\*Includes meetings.

\*\*\*Includes one federal and one state tax return. \$75 per additional state return.

Financial plans are based on your financial situation at the time we present the plan to you, and on the financial information you provide to us. You must promptly notify our firm if your financial situation, goals, objectives, or needs change.

We do not represent, warrant, or imply that the services or methods of analysis employed by our firm can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines.

A conflict may exist between the interest of our firm and your interests. Further, you are under no obligation to act on our financial planning recommendations. Should you choose to act on any of our recommendations, you are not obligated to implement the financial plan through any of our other investment advisory services. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm.

## **Tax Preparation**

Parkshore Wealth Management in normal course of business offers tax preparation services to existing clients. Preparation of taxes is not a requirement of becoming or maintaining a relationship with Parkshore Wealth Management. We charge a fee for this service which is separate and apart from our investment management fees and the fee depends on the complexity and time spent on the return.

## **Types of Investments**

We primarily offer advice on equity securities (stocks), exchange traded funds (ETFs), corporate, municipal and government debt securities (bonds), certificates of deposit, and mutual funds.

Additionally, we may advise you on any type of investment that we deem appropriate based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

You may request that we refrain from investing in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

## **Assets Under Management**

As of February 15, 2016, we manage \$114,326,200 in client assets on a discretionary basis, and \$0 in client assets on a non-discretionary basis.

## **Item 5 Fees and Compensation**

We have a fiduciary responsibility to our clients. This means that our first allegiance is to our clients. Because of this responsibility, it is important to align both planner and the client incentives. With respect to fees, we believe that simple and straight forward is in the clients best interest. We charge a quarterly fee based on the value of our client portfolios. Lower fees for comparable services may be available from other sources.

### **Fees for Portfolio Management**

<b>Standard Portfolio Fee Schedule</b>	<b>Annual</b>	<b>Quarterly</b>
First \$0 to \$250,000	1.500%	0.375%
Next \$250,000 to \$500,000	1.000%	0.250%
Next \$500,000 to \$2,000,000	0.750%	0.188%
Next \$2,000,000 to \$3,000,000	0.650%	0.163%
Over \$3,000,000	Negotiable	

For our client's convenience, fees for portfolio management are debited from their brokerage accounts in advance at the beginning of each calendar quarter and are based on the portfolio's balance on the last day of the preceding quarter. Partial calendar quarter fees will be prorated for the remaining number of days in the quarter. This only occurs after their quarterly performance reports and fee reports have been sent to the client. As fiduciaries we only receive fees from our clients and from no other source, e.g, the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

We will deduct our advisory fee only when you have given our firm written authorization permitting the fees to be paid directly from your account. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy. We will also receive a duplicate copy of your account statements.

At our discretion, we may combine the account values of family members living in the same household to determine the applicable advisory fee. For example, we may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts. Combining account values may increase the asset total, which may result in your paying a reduced advisory fee based on the available breakpoints in our fee schedule stated above.

Brokerage transaction fees/costs will be incurred due to purchasing and selling/redeeming of securities. These costs are paid from the money market in the respective brokerage accounts and are separate from the fees charged by PWM.

All fees paid to PWM for advisory services are separate from the fees and expenses charged to shareholders of mutual fund shares by the mutual funds, and shares of exchange-traded funds by the issuing companies. Complete explanations of the expenses charged by the mutual funds and exchange-traded funds are contained in their respective prospectuses. Clients are encouraged to read the fund prospectuses.

Once in effect, the agreement may be terminated by either party upon thirty (30) days prior written notice to the other party. Additionally, the agreement terminates unless all appropriate fees have been paid. Upon termination, any unearned quarterly fees will be prorated from the date of termination and refunded to the client.

### **Fees for Financial Planning**

As part of our financial planning process, we may provide clients with a written financial plan which may consist of a balance sheet, cash flow statement, tax planning, investment portfolio analysis, investment plan and policy statement, estate planning and estate tax analysis, retirement planning and projections for future sources of income, insurance analysis, educational planning and funding, business planning, income tax planning, real estate analysis and any other such planning services that the client may require.

To determine the financial planning fee for written financial plan, we take into consideration the amount and breadth of work that PWM will need to perform in order to compensate PWM for its services. Generally, relatively smaller projects will be billed on an hourly basis rather than a fixed fee. The hourly rate will vary depending on the billing rate of the person performing the labor. Hourly billing rates at PWM range from \$150 - \$250. Comprehensive financial planning will generally be based on a fixed fee. The fixed fee is determined before the project begins by approximating the number of hours and involvement of PWM's staff that will be required to complete the plan. Once a bid has been given to a client regarding a plan, the amount of the fee will not increase, and remains fixed to the completion of the project.

Fees are generally collected at the time the plan is presented. A retainer may be payable at the time the data is collected. We will not require prepayment of a fee more than six months in advance and in excess of \$1,200. An agreement terminates upon the presentation of the plan or at the end of the consultation, for services requested by the client and agreed upon by the planner.

We charge a monthly fee, in advance, of either \$100 or \$150 for The Young Accumulator financial planning services. The provided services will be rendered based on the monthly service plan selected by the client. The monthly service plan can be changed by client at anytime during the agreement by notifying PWM in writing.

In addition to the fees indicated above, the Client may also reimburse PWM and the Planner for the expenses incurred in connection with services so performed, including document duplication, mailing, telephone, and travel expense.

Clients shall be given five (5) business days to unconditionally rescind the agreement and receive a full refund of any and all fees collected. If a client pays any fees in advance and terminates the agreement more than five (5) business days after it has been signed, any unused fees will be refunded.

### **Fees for Tax Preparation**

PWM offers tax preparation services primarily for our investment portfolio clients. The fees charged for tax preparation are separate from our portfolio management fees and are calculated based on the complexity and time spent preparing the return. Generally, our fees range from \$150 to \$250 per hour, complexity of the return, and the organization of documents from the client.

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

Parkshore Wealth Management does not charge performance based or side-by-side fees.

## **Item 7 Types of Clients**

Parkshore Wealth Management is committed to our clients' success. We see 'above and beyond' as the right way to do things and not as something extra. We are passionate about our business. We believe in transparency and in our fiduciary responsibility. We love our clients and are dedicated to helping them achieve their goals.

We provide guidance to individuals and families in an effort to:

- Help improve their lifestyle
- Enjoy the possibilities that life has to offer
- Protect and grow their nest egg
- Leave a legacy to their loved ones

We have a soft minimum of \$100,000 of investable assets.

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

### **Markets Work**

Markets throughout the world have a history of rewarding investors for the capital they supply. Companies compete with each other for investment capital, and millions of investors compete with each other to find the most attractive returns. This competition quickly drives prices to fair value, ensuring that no investor can expect greater returns without bearing greater risk. Traditional investment managers strive to beat the market by taking advantage of pricing "mistakes" and attempting to predict the future. Too often, this proves costly and futile. Predictions go awry and managers miss the strong returns that markets provide by holding the wrong stocks at the wrong time. Meanwhile, capital economies thrive—not because markets fail but because they succeed.

### **Investing Versus Speculating**

The futility of speculation is good news for the investor. It means that prices for public securities are fair and that persistent differences in average portfolio returns are explained by differences in average risk. It is certainly possible to outperform markets, but not without accepting increased risk. When you reject costly speculation and guesswork, investing becomes a matter of identifying the risks that bear compensation and choosing how much of these risks to take. Financial science identifies the sources of investment returns. Dimensional provides the tools and experience to achieve them.



## **Take Risks Worth Taking**

Evidence from practicing investors and academics alike points to an undeniable conclusion: Returns come from risk. Gain is rarely accomplished without taking a chance, but not all risks carry a reliable reward. Financial science over the last fifty years has brought us to a powerful understanding of the risks that are worth taking and the risks that are not. Everything we have learned about expected returns in the equity markets can be summarized in three dimensions. The first is that stocks are riskier than bonds and have greater expected returns. Relative performance among stocks is largely driven by the two other dimensions: small vs. large and value vs. growth. Many economists believe small cap and value stocks outperform because the market rationally discounts their prices to reflect underlying risk. The lower prices result in higher returns to investors as compensation for bearing this risk.

Relative performance in fixed income is largely driven by two dimensions: bond maturity and credit quality. Bonds that mature farther in the future are subject to the risk of unexpected changes in interest rates. Bonds with lower credit quality are subject to the risk of default. Extending bond maturities and reducing credit quality increases potential returns.

With this understanding, investors can plan the total risk/return profile of their portfolios, considering how much exposure they need to target their performance goals. For example, investors seeking greater expected returns may increase their equity exposure while keeping their bond portfolio short and high-quality. Alternatively, they may choose to hold bonds with slightly longer maturities and slightly lower credit quality while maintaining their equity allocation. Whatever approach you choose, financial science has clarified the investment process by identifying the relevant dimensions of performance.

We believe that the better way to invest is to work in harmony with market forces. We use asset allocation and passive investment strategies to construct client portfolios. We use mutual funds in order to purchase as much of the investment universe as we can. The practice of diversification means that the positive or negative effects of any given company or industry will have a much lighter effect on the clients portfolio. The mutual funds that we use have extremely low expense ratios - which means that more of their return is passed on to the investor.

Parkshore Wealth Management, and its advisors (PWM) does not guarantee the future performance of a client's respective Account(s) or any specific level of performance, the success of any investment decision, or strategy that Advisor may use. A client understands that investment decisions made on and for a client's behalf by PWM are subject to various markets, currency, economic, political, and business risks, and that those investment decisions may not be profitable. Except as may otherwise be provided by law, PWM will not be liable for any loss that a client may suffer by reason of any investment decision made or other action taken or omitted in good faith by PWM with that degree of care, skill, prudence, and diligence under the circumstance that a prudent person acting in a fiduciary capacity would use and any loss arising from PWM's adherence to the client's written or oral instructions; or any act or failure to act by the Custodian, any broker or dealer to which the PWM directs transactions on the client's behalf, or by any other third party.

Investors should always remember that the past performance of a manager, or markets in general, is no indication of how they will perform in the future. There is never a guarantee of performance. Investors should be wary of anyone selling historical performance rather than a sound and balanced strategy.

## **Item 9 Disciplinary Information**

There have been no disciplinary actions for any advisors at Parkshore Wealth Management.

## Item 10 Other Financial Industry Activities and Affiliations

We have not provided information on other financial industry activities and affiliations because we do not have any relationship or arrangement that is material to our advisory business or to our clients with any of the types of entities listed below.

1. broker-dealer, municipal securities dealer, or government securities dealer or broker.
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund).
3. other investment adviser or financial planner.
4. futures commission merchant, commodity pool operator, or commodity trading advisor.
5. banking or thrift institution.
6. accountant or accounting firm.
7. lawyer or law firm.
8. insurance company or agency.
9. pension consultant.
10. real estate broker or dealer.
11. sponsor or syndicator of limited partnerships.

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

Parkshore Wealth Management (PWM), as a matter of policy and practice, and consistent with industry best practices and Security and Exchange Commission (SEC) requirements, under Rule 204A-1, has adopted a Code of Ethics requiring high standards of business conduct, compliance with federal securities laws, reporting and record keeping of personal securities transactions and holdings, reviews, and sanctions.

PWM's Code of Ethics incorporates written supervision policies and procedures in accordance with federal and state securities laws that include standards of conduct, protecting inside information, personal securities trading of supervised persons, IPO's, and private placement by supervised persons, reporting of violations, written acknowledgment of the Code of Ethics by each supervised person, and other code requirements including gifts and outside employment, reviews and enforcement, record keeping, and ADV disclosure.

PWM's complete Code of Ethics is available to all clients upon request. Questions regarding PWM's Code of Ethics should be directed to Daniel C. Andersen, Chief Compliance Officer.

PWM places high value on the fiduciary nature of the relationship between the investment advisor and its clients. The fiduciary duty includes, but is not limited to, a duty at all times to place the interests of the clients ahead of those of the advisor and the advisor's employees, representatives, and associated persons (supervised persons). In addition, this fiduciary duty means loyalty, fairness, good faith towards its clients, and adherence not only to specific provisions of the code but to the general principles that guide the code.

General principles inherent in this Code of Ethics additionally include the requirement that all personal securities transactions be conducted in a manner consistent with the Code of Ethics and in such a manner as to avoid any actual or potential conflict of interest or any abuse of any individual's position of trust and responsibility; and that any "access persons" should not take inappropriate advantage of

their positions or their relationships with the advisor or its clients. Access persons are supervised persons who may have information about investment recommendations whose effect may not yet be in the marketplace (nonpublic information).

From time to time, the principals and other associated persons of PWM may invest in the same or similar securities as clients of the firm. At other times, based on individual needs of the client and/or associated person, investments recommended for sale/purchase to the client may be bought/sold for the associated person. Clients of PWM are advised hereby that PWM has in place policies and procedures to govern the personal trading activities of its personnel, including insider Trading Policies and Procedures and that all such activity is monitored in an attempt to ensure that all conflicts of interest, or potential conflicts of interest, are strictly avoided in the clients' best interest.

## **Item 12 Brokerage Practices**

Advisor participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA ("TD Ameritrade "), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the Program.

Parkshore Wealth Management (PWM) participates in TD Ameritrade's institutional customer program and PWM may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between PWM's participation in the program and the investment advice it gives to its Clients, although PWM receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving PWM participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to PWM by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by PWM's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit PWM but may not benefit its Client accounts. These products or services may assist PWM in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help PWM manage and further develop its business enterprise. The benefits received by PWM or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, the firm endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by PWM or its related persons in and of itself creates a potential conflict of interest and may indirectly influence PWM's choice of TD Ameritrade for custody and brokerage services.

### **Brokerage for Client Referrals**

We may receive client referrals from TD Ameritrade through our participation in the TD Ameritrade AdvisorDirect program. Please see additional disclosures regarding this arrangement under under *Item 13 - Client Referrals and Other Compensation* below.

**Directed Brokerage**

We routinely recommend that you direct our firm to execute transactions through TD Ameritrade. As such, we may be unable to achieve the most favorable execution of your transactions and you may pay higher brokerage commissions than you might otherwise pay through another broker-dealer that offers the same types of services. Not all advisers require their clients to direct brokerage.

**Block Trades**

We do not combine multiple orders for shares of the same securities purchased for advisory accounts we manage (the practice of combining multiple orders for shares of the same securities is commonly referred to as "block trading"). Accordingly, you may pay different prices for the same securities transactions than other clients pay. Furthermore, we may not be able to buy and sell the same quantities of securities for you and you may pay higher commissions, fees, and/or transaction costs than other clients.

**Item 13 Review of Accounts**

Portfolio clients receive continuous and ongoing review of their portfolios. Reviews are conducted by advisors and staff of Parkshore Wealth Management (PWM). Reviews include analysis of market conditions, economic conditions, individual client needs and circumstances and any other relevant factors. Portfolio clients receive written quarterly portfolio reports that include detailed information regarding their portfolio, including current allocation, market value as of the end of the most recent preceding quarter, transactions during the preceding quarter, and other pertinent information. In addition, each client receives a custodial account statement monthly, and a confirmation of each transaction from client's custodian.

Daily Review

The nature of the markets mean that different asset classes move up and down at different rates. Because of these movements, portfolios move in and out of their predetermined asset allocation percentages. PWM monitors, on a daily basis, the allocation of each client account. If an account moves out of tolerance, we then take action to put it back into balance. This is done through strategic trading.

Weekly Review

We review each client accounts cash balance. As bonds mature, dividends are paid, cash is deposited etc. there can be a build up of un-invested cash in an account. Each week, PWM reviews the cash balance of each client account. If it is determined that an account has cash that should be invested may invest the cash in accordance with the clients predetermined asset allocation.

Periodic Review

There are several triggers that will cause PWM to review client accounts on a periodic basis. If a client contacts PWM with a specific need, we evaluate the best ways to fulfill the need. When we have periodic meetings with a client, we will review their current needs and goals and compare that information with their portfolio. Whatever the trigger, it will cause us to review the clients account.

## Item 14 Client Referrals and Other Compensation

Parkshore Wealth Management (PWM) may receive client referrals from TD Ameritrade through its participation in TD Ameritrade AdvisorDirect. In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, PWM may have been selected to participate in AdvisorDirect based on the amount and profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount brokerdealer independent of and unaffiliated with PWM and there is no employee or agency relationship between them. TD Ameritrade has established AdvisorDirect as a means of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisors. TD Ameritrade does not supervise PWM and has no responsibility for PWM's management of client portfolios or PWM's other advice or services. PWM pays TD Ameritrade an ongoing fee for each successful client referral. This fee is usually a percentage (not to exceed 25%) of the advisory fee that the client pays to PWM ("Solicitation Fee"). PWM will also pay TD Ameritrade the Solicitation Fee on any advisory fees received by PWM from any of a referred client's family members, including a spouse, child or any other immediate family member who resides with the referred client and hired PWM on the recommendation of such referred client. PWM will not charge clients referred through AdvisorDirect any fees or costs higher than its standard fee schedule offered to its clients or otherwise pass Solicitation Fees paid to TD Ameritrade to its clients. For information regarding additional or other fees paid directly or indirectly to TD Ameritrade, please refer to the TD Ameritrade AdvisorDirect Disclosure and Acknowledgment Form.

PWM's participation in AdvisorDirect raises potential conflicts of interest. TD Ameritrade will most likely refer clients through AdvisorDirect to investment advisors that encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to obtain client referrals from TD Ameritrade, PWM may have an incentive to recommend to clients that the assets under management by PWM be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. In addition, PWM has agreed not to solicit clients referred to it through AdvisorDirect to transfer their accounts from TD Ameritrade or to establish brokerage or custody accounts at other custodians, except when its fiduciary duties require doing so. PWM's participation in AdvisorDirect does not diminish its duty to seek best execution of trades for client accounts.

## Item 15 Custody

As paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other [independent,] qualified custodian. You will receive account statements from the [independent,] qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy. If firm also sends client statements: We will also provide statements to you reflecting the amount of advisory fee deducted from your account.

You should compare our statements with the statements from your account custodian(s) to reconcile the information reflected on each statement. If you have a question regarding your account statement, or if you did not receive a statement from your custodian, please contact us directly at the telephone number on the cover page of this brochure.

## Item 16 Investment Discretion

You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Please refer to the *Advisory Business* section in this brochure for more information on our discretionary management services.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s). You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

## Item 17 Voting Client Securities

Parkshore Wealth Management will not vote, nor give advice on how to vote proxies for securities held in the client's account as such right has been expressly reserved for the client. The client, will receive voting paperwork directly from each fund or security. The client should review each issue and make their own decision.

## Item 18 Financial Information

Parkshore Wealth Management is not required to provide financial information as it does not charge prepayment fees greater than \$1,200 six months or more in advance of service.

Parkshore Wealth Management has no financial obligations which would impair it from meeting its contractual commitments to clients.

Parkshore Wealth Management has not been the subject of any bankruptcy proceedings.

## Item 19 Requirements for State-Registered Advisers

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

## Item 20 Additional Information

### Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to



ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

### **Trade Errors**

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, the trade error will be corrected in the trade error account of the executing broker-dealer and you will not keep the profit.

### **Class Action Lawsuits**

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