

**Voluntary Benefits Advisory Network, LLC  
d/b/a  
One Source Health & Wealth Management**

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

**Effective: January 4, 2016**

This Form ADV2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Voluntary Benefits Advisory Network, LLC d/b/a One Source Health & Wealth Management (“One Source”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (888) 268-8884.

One Source is a registered investment advisor primarily located in the State of Arizona. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through One Source to assist you in determining whether to retain the Advisor.

Additional information about One Source and its advisory persons are available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by our firm name or by our CRD#194511.

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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of One Source.

One Source believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. One Source encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

- One Source has moved its primary office location to Scottsdale, AZ.
- Mr. Philip Taylor has joined the Advisor as the new President and Chief Compliance Officer.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of One Source.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our company name or by our Firm CRD number (194511).

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (888) 268-8884.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Voluntary Benefits Advisory Network, LLC d/b/a One Source Health & Wealth Management (“One Source” or the “Advisor”) is a registered investment advisor located in the States of Arizona and California. One Source is organized as a limited liability company (“LLC”) under the laws of the State of California. One Source was founded in March 2015, and is owned by Chadrick Frazier (Founder and Managing Member), Stacey L. Scambray (Managing Member), Philip S. Taylor (President and Chief Compliance Officer), Anthony P. Stornetta (President of Insurance Services) and Benefit & Risk Management Services, Inc. (Minority Owner). Philip Taylor provides investment advisory services for One Source and also serves as the Chief Compliance Officer. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by One Source.

### **B. Advisory Services Offered**

One Source offers investment advisory services to individuals, high net worth individuals, trusts, estates and business clients in California and other states (each referred to as a “Client”).

#### Investment Management Services

One Source provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. One Source works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. One Source will then construct a portfolio, consisting of diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks and bonds and other types of securities, as appropriate, to meet the needs of its Clients.

One Source’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. One Source will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

One Source evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. One Source may recommend, on occasion, redistributing investment allocations to diversify the portfolio. One Source may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

One Source will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will One Source accept or maintain custody of a Client’s funds or securities, except for authorized deduction of the Advisor’s fees. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client investment advisory agreement.

#### Financial Planning Services

One Source will typically provide a variety of financial planning services to individuals and families, pursuant to a written financial planning agreement. Services are offered in several areas of a Client’s financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation based on the Client’s financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client’s financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. One Source may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

### **C. Client Account Management**

Prior to engaging One Source to provide investment advisory services, each Client is required to enter into an investment advisory agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy – One Source will assist the Client's in determining their investment goals and objectives and recommend strategy[ies] to be employed to meet those objectives.
- Asset Allocation – One Source will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – One Source will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – One Source will provide investment management and ongoing oversight of the Client's portfolio and overall account.

### **D. Wrap Fee Programs**

One Source includes securities transaction costs together with its investment advisory fees into a single, "bundled" fee. Including these fees into a single asset-based fee is considered a "wrap fee program". Depending on the level of trading required for the Client's account[s] in a particular year, the Client may pay more or less in total fees than if the Client paid its own transaction fees. Please see Appendix I – Wrap Fee Brochure, which is included as part of this Disclosure Brochure.

### **E. Assets Under Management**

One Source is a newly established advisor. Assets under management shall be reported following the Advisor's December 31, 2015 fiscal year end. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign an investment advisory agreement that details the responsibilities of One Source and the Client.

### **A. Fees for Advisory Services**

#### Investment Management Services

Investment advisory fees are calculated either monthly in advance or quarterly in arrears (the "billing period"), pursuant to the terms of the investment advisory agreement with each Client. Investment advisory fees range from 0.75% to 1.75% depending on the size and complexity of the Client relationship. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee. Larger relationships are often charged a lower fee.

Investment advisory fees in the first billing period of service are prorated from the inception date of the account[s] to the end of the first billing period. Fees may be negotiable at the discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by One Source will be independently valued by the designated Custodian. One Source will not have the authority or responsibility to value portfolio securities.

#### Financial Planning Services

One Source offers ongoing financial planning services for an annual fee. For employed individuals, the annual fee is charged at 1.00% of annual income. For retired individuals, the annual fee is charged at 1.00% of net worth. The Advisor requires a minimum annual planning fee of \$1,000.

The Advisor may also deliver financial planning services for a specific project or need. In such instance, the Client will be charged on an hourly fee of up to \$350 per hour or a fixed fee for the engagement that is negotiated based on the expected effort and duration. An estimate for total hours or costs will be determined prior to establishing the advisory relationship.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services.

### **B. Fee Billing**

#### Investment Management Services

Investment advisory fees will be calculated by the Advisor and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective billing period end date. The amount due is calculated by applying the applicable rate (monthly or quarterly) to the total assets under management with One Source at the end of each billing period. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting One Source to be paid directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

#### Financial Planning Services

Financial planning and consulting fees are invoiced by the Advisor and are due upon receipt of the agreed upon deliverable. For ongoing planning services, fees may be due either monthly in arrears or quarterly in advance, pursuant to the terms of the planning agreement. For one-time planning engagements, fees are invoiced up to 50% upon execution of the financial planning agreement and the balance due upon completion of the agreed upon deliverable[s].

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than One Source, in connection with investments made on behalf of the Client's account[s].

For Clients in the One Source Wrap Fee Program, all normal custodial and securities transaction fees charged by the Custodian are included in the Client's investment advisory fee as noted above. The Client will be responsible for securities transaction fees for Client-directed trades.

In addition, all fees paid to One Source for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of One Source, but would not receive the services provided by One Source which are designed, among other things,

to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by One Source to fully understand the total fees to be paid.

#### **D. Advance Payment of Fees and Termination**

##### Investment Management Services

One Source may be compensated for its investment management services in advance of the period in which investment advisory services are rendered. Either party may request to terminate the investment advisory agreement by providing advance written notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid fees from the effective date of termination to the end of the billing period. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior approval.

##### Financial Planning and Consulting Services

One Source may be partially compensated for its financial planning services in advance. Either party may terminate a planning agreement at any time by providing written notice to the other party. In addition, the Client may terminate the agreement within five (5) business days of signing the Advisor's financial planning or consulting agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid fees from the effective date of termination to the end of the billing period. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior approval.

#### **E. Compensation for Sales of Securities**

One Source does not buy or sell securities on a commission basis and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above. Certain Supervised Persons of the Advisor may also be licensed insurance professionals and will receive commissions for the implementations of insurance recommendations. Please see Item 10.

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

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

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

#### **Item 7 – Types of Clients**

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One Source offers investment advisory services to individuals, high net worth individuals, trusts, estates and business clients. The relative percentage of each type of Client is available on One Source's Form ADV Part 1. These percentages will change over time. One Source generally does not impose a minimum account or relationship size for establishing an advisory account, but requires a minimum annual fee of \$1,000.

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

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##### **A. Methods of Analysis**

One Source primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from One Source is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted above, One Source generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. One Source will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, One



Source may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

## **B. Risk of Loss**

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

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

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. **Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving One Source or any of its employees.** One Source and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

To review the firm information contained in Form ADV Part 1, select the option for "Investment Adviser Search", then selecting "Firm" and enter **194511** in the field labeled "Firm Name or CRD# or SEC#". This will provide access to Form ADV Parts 1 and 2. Item 11 of the Form ADV Part 1 lists legal and disciplinary disclosure questions.

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

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### Insurance Agency Affiliations

Certain Supervised Persons of the Advisor may serve as licensed insurance professionals. Implementations of insurance recommendation are separate and apart from a Supervised Person's role with One Source. As an insurance professional, the Supervised Persons will typically receive commissions and other related revenues from the various insurance companies whose products are sold. Supervised Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset financial planning regular advisory fees, but will be excluded from asset calculations for investment management services. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the Supervised Persons or the Advisor.



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

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### **A. Code of Ethics**

One Source has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all Supervised Persons associated with One Source. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. One Source and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of One Source Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (888) 268-8884.

### **B. Personal Trading with Material Interest**

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

### **C. Personal Trading in Same Securities as Clients**

One Source allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of One Source may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by One Source requiring reporting of personal securities trades by its Supervised Persons for review by the CCO. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

In addition the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

### **D. Personal Trading at Same Time as Client**

While One Source allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will One Source, or any Supervised Person of One Source, transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

One Source does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize One Source to direct trades to this custodian as agreed in the investment advisory agreement. Further, One Source does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where One Source does not exercise discretion over the selection of the custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by One Source.

One Source may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. One Source does not receive research services, other products, or compensation as a result of recommending a

particular broker that may result in the Client paying higher commissions than those obtainable through other brokers. One Source will generally recommend that Clients establish their account[s] at TD Ameritrade Institutional, a division of TD Ameritrade, Inc., ("TD Ameritrade") member FINRA/SIPC. TD Ameritrade will serve as the Client's "qualified custodian". One Source maintains an institutional relationship with TD Ameritrade, whereby the Advisor receives economic benefits from TD Ameritrade (Please see Item 14 below.).

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **One Source does not participate in soft dollar programs sponsored or offered by any broker-dealer.**

**2. Brokerage Referrals** - One Source does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where One Source will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the custodian, One Source will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. One Source will execute its transactions through an unaffiliated broker-dealer selected by the Client. One Source may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in a Client's account[s] are monitored on a regular and continuous basis by the Chief Compliance Officer, Philip Taylor. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify One Source if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

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### **A. Compensation Received by One Source**

One Source does not compensate receive additional compensation from Clients.

#### Participation in Institutional Advisor Platform

One Source 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. The Advisor receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, One Source participates in TD Ameritrade's institutional customer program and the Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between the Advisor's participation in the program and the investment advice it gives to its Clients, although the Advisor 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 the Advisor 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 the Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by the Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit the Advisor but may not benefit its Client accounts. These products or services may assist the Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help the Advisor manage and further develop its business enterprise. The benefits received by the Advisor 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, One Source endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by One Source or its related persons in and of itself creates a conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

One Source may only implement its investment recommendations after the Client has arranged for and furnished the Advisor with all information and authorization[s] regarding account[s] with their financial institutions. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by One Source. One Source may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. In addition, One Source reviews the custodians that the recommend at least annually to confirm the appropriateness of its recommendations.

### **B. Client Referrals from Solicitors**

One Source may receive referral from unaffiliated third parties ("solicitors"). One Source may compensate a solicitor for the referral of new relationships. The Advisor will ensure the solicitor is properly licensed (if required) in the jurisdictions where the Client resides. Compensation paid to a solicitor will not result in the Client being charged a higher fee than they would otherwise be charged. The solicitor will provide all prospective clients with a disclosure statement regarding the fee sharing arrangement with One Source.

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## **Item 15 – Custody**

One Source does not accept or maintain custody of any Client accounts, except for the authorized deduction of the advisor's fee (as noted in Item 5 above). All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct One Source to utilize that custodian for the Client's security transactions. One Source encourages Clients to review statements provided by the account custodian. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices".

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## **Item 16 – Investment Discretion**

One Source generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by One Source. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by One Source will be in accordance with each Client's investment objectives and goals.

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

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

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## **Item 18 – Financial Information**

Neither One Source, nor its management, have any adverse financial situations that would reasonably impair the ability of One Source to meet all obligations to its Clients. Neither One Source, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. One Source is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$500 or more for services to be performed six months or more in advance.

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## **Item 19 – Requirements for State Registered Advisors**

### **A. Educational Background and Business Experience of Principal Officers**

The President and Chief Compliance Officer of One Source is Philip S. Taylor. Information regarding the formal education and background of Mr. Taylor is included in Item 2 of Part 2B below.

Chadrick Frazier is the Founder of One Source. Chad is a seasoned insurance consultant with over 17 years of experience working with both large and small employers. He has developed a thorough knowledge in the areas of Voluntary and Group Benefit Consulting, as well as Health & Wellness Management. Chad began his career 17 years ago at Strategic Financial Partners as a Managing Associate. He spent seven years training, coaching and recruiting for Strategic Financial Partners. For the last 12 years, Chad has worked for a large national voluntary insurance company specializing in partnering with benefit brokers as the subject matter expert in voluntary benefit planning. Chad does not provide investment advisory services to Clients of One Source.

Anthony P. Stornetta is the President of Insurance Services for One Source. Tony established his insurance career more than 13 years ago. He began with Farmers Insurance Group and graduated to independent status more than five years ago as he understood that servicing his clients through access to multiple markets and alternative ideas would ultimately serve his clients' best interests and needs. Tony attended California State University Fresno, taking a brief hiatus in to join the United States Marine Corps. Tony graduated from CSUF in 1997 with a Bachelor of Science in Agricultural Business. Tony does not provide investment advisory services to Clients of One Source.

## **B. Other Business Activities of Principal Officers**

### Insurance Agency Affiliations

The Principal Officers of One Source are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from the advisory services provided by One Source. As an insurance professional, one may receive customary commissions and other related revenues from the various insurance companies whose products are sold. The Principal Officers of One Source are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products. Clients are under no obligation to implement any recommendations made by the Advisor or its Principal Officers.

## **C. Performance Fee Calculations**

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

## **D. Disciplinary Information**

***There are no legal, civil or disciplinary events to disclose regarding One Source or its Principals.*** Neither One Source nor its Principal Officers has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against One Source or its Principal Officers.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding One Source or its Principal Officers.***

## **E. Material Relationships with Issuers of Securities**

Neither One Source nor its Principals Officers has any relationships or arrangements with issuers of securities.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Philip S. Taylor  
President and Chief Compliance Officer**

**Effective: December 30, 2015**

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Philip S. Taylor (CRD# **1000487**) in addition to the information contained in the Voluntary Benefits Advisory Network, LLC d/b/a One Source Health & Wealth Management (“One Source” or the “Advisor”) (CRD # 194511) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the One Source Disclosure Brochure or this Brochure Supplement, please contact us at (888) 268-8884.

Additional information about Mr. Taylor is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

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Philip S. Taylor is the President and Chief Compliance Officer of One Source. Philip Taylor, born in 1954, is dedicated to advising Clients of One Source. Additional information regarding Mr. Taylor's employment history is included below.

### Employment History:

|  |                    |
|--|--------------------|
| President and Chief Compliance Officer, Voluntary Benefits Advisory Network, LLC d/b/a One Source Health & Wealth Management | 10/2015 to Present |
| VP-Investments, First Financial Equity Corp.   | 01/2012 to 12/2015 |
| Senior Vice President - Investments, Stifel Nicholas   | 11/2011 to 01/2012 |
| Senior Vice President -Branch Manager, Stone & Youngberg   | 07/2006 to 11/2011 |
| Senior Vice President - Regional Director, Quick & Reilly  | 04/2001 to 08/2004 |

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Taylor.*** Mr. Taylor has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Taylor.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Taylor.***

However, we do encourage you to independently view the background of Mr. Taylor on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter **1000487** in the field labeled "Individual Name or CRD#".

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

My Taylor is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Taylor's advisory role with One Source. As an insurance professional, Mr. Taylor may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Taylor is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products. Clients are under no obligation to implement any recommendations made by the Advisor or Mr. Taylor.

## Item 5 – Additional Compensation

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Mr. Taylor is also be compensated by Clients for insurance services. These business activities are detailed above in Item 4.

## Item 6 – Supervision

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Mr. Taylor serves as the President and Chief Compliance Officer of One Source. Mr. Taylor can be reached at (888) 268-8884.

One Source has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of One Source. Further, One Source is subject to regulatory oversight by various agencies. These agencies require registration by One Source and its employees. As a registered entity,



One Source is subject to examinations by regulators, which may be announced or unannounced. One Source is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

#### **Item 7 – Requirements for State Registered Advisors**

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Mr. Taylor does not have any additional information to disclose.

## **Form ADV Part 2A Appendix 1 Wrap Fee Brochure**

**Effective: December 30, 2015**

This Appendix 1 ("Wrap Fee Brochure") provides information about the business practices and fees Voluntary Benefits Advisory Network, LLC d/b/a One Source Health & Wealth Management ("One Source" or the "Advisor") when Client transaction costs are included with investment advisory fees as a single fee. This Wrap Fee Brochure shall always be accompanied by the One Source Disclosure Brochure, which provides complete details on the business practices of One Source. If you did not receive the complete One Source Disclosure Brochure or you have any questions about the contents of this Wrap Fee Brochure or the One Source Disclosure Brochure, please contact us at (888) 268-8884.

One Source is a registered investment advisor primarily located in the State of Arizona. The information in this Wrap Fee Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Wrap Fee Brochure provides information about One Source to assist you in determining whether to retain the Advisor.

Additional information about One Source and its advisory persons are available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by our firm name or by our CRD#194511.

## **Item 2 – Material Changes**

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Form ADV 2 Appendix 1 provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. In particular, this Wrap Fee Brochure discusses the fee billing practices of the Advisor as a supplement to the Disclosure Brochure.

### Material Changes

- One Source has moved its primary office location to Scottsdale, AZ.
- Mr. Philip Taylor has joined the Advisor as the new President and Chief Compliance Officer.

### **Item 3 – Table of Contents**

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

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### **Services**

Voluntary Benefits Advisory Network, LLC d/b/a One Source Health & Wealth Management (“One Source”) provides customized wealth advisory services for its Clients. This Wrap Fee Brochure is provided as a supplement to the One Source Disclosure Brochure (Form ADV2A), which this Wrap Fee Brochure is attached. This Wrap Fee Brochure is provided along with the complete Disclosure Brochure to provide full details of the business practices and fees when selecting One Source as your investment advisor.

As part of the investment advisory fees noted in Item 5 of the Disclosure Brochure, One Source typically includes normal securities transaction fees as part of the overall investment advisory fee. Securities regulations often refer to this combined fee structure as a “Wrap Fee Program”.

The sole purpose of this Wrap Fee Brochure is to provide additional disclosure relating the combination of securities transaction fees into the single investment advisory fee. This Wrap Fee Brochure references back to the One Source Disclosure Brochure in which this Wrap Fee Brochure serves as an Appendix.

**Please see Item 4 – Advisory Services of the Disclosure Brochure for details on One Source’s investment philosophy and related services.**

### **Program Costs**

Advisory services provided by One Source may be offered in a wrap fee structure whereby normal securities transaction costs are included in the overall investment advisory fee paid to One Source.

As the level of trading in a Client’s account[s] may vary from year to year, the annual cost to the Client may be more or less than engaging for advisory services where the transactions costs are borne by the Client. The cost of the Wrap Fee Program varies depending on services to be provided be to each Client.

**Please see Item 5 – Fees and Compensation for complete details on fees.**

### **Fees**

The Wrap Fee Program includes normal securities trading costs incurred in connection with the discretionary investment management services provided by One Source. Securities transaction fees for Client directed trades are borne by the Client. Please see Item 5.C. – Other Fees and Expenses in the Disclosure Brochure (included with this Wrap Fee Brochure).

### **Compensation**

One Source is the sponsor and portfolio manager of this Wrap Fee Program. One Source receives investment advisory fees paid by Clients for investment advisory services covered under this Wrap Fee Program.

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

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One Source offers investment advisory services to individuals, high net worth individuals, trusts, estates and business. One Source generally does not impose a minimum account or relationship size for establishing an advisory account, but requires a minimum annual fee of \$1,000.

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

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### **Portfolio Manager Selection**

One Source acts as sponsor and as portfolio manager for this Wrap Fee Program. Advisory services are detailed in Item 4 of the Disclosure Brochure.

### **Related Persons**

One Source’s President and Chief Compliance Officer Philip S. Taylor, serves as portfolio manager for services under this Wrap Fee Program. One Source does not act as portfolio manager for any third-party wrap fee programs.

#### Supervised Persons

As noted above, Mr. Taylor serves as the portfolio manager for the Wrap Fee Program. Please refer to the complete Disclosure Brochure (included with this Wrap Fee Brochure) for details on the services provided by One Source and the Brochure Supplement for the background of Mr. Taylor.

#### Performance-Based Fees

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

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

#### Methods of Analysis

Please see Item 8 of the Disclosure Brochure (included with this Wrap Fee Brochure) for details on the research and analysis methods employed by the Advisor.

#### Risk of Loss

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

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account[s]. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. Please see Item 8.B. – Risk of Loss in the Disclosure Brochure for details on investment risks.**

#### Voting Client Securities

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

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

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One Source is the sponsor and sole portfolio manager for the Program. The Advisor does not share Client information with other portfolio managers because it is the sole portfolio manager for this Wrap Fee Program. Please also see the One Source Privacy Policy (included after this Wrap Fee Brochure).

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

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One Source is a full-service wealth advisory firm. Clients always have direct access to the Portfolio Managers at One Source.

## **Item 9 – Additional Information**

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

#### Disciplinary Information

There are no disciplinary events to disclose. Please see Item 9 of the One Source Disclosure Brochure as well as Item 3 of Mr. Taylor's Brochure Supplement (included with this Wrap Fee Brochure).

#### Other Financial Activities and Affiliations

Please see Items 10 and 14 of the One Source Disclosure Brochure as well as Items 4 and 5 of Mr. Taylor's Brochure Supplement (included with this Wrap Fee Brochure).

#### *Participation in Institutional Advisor Platform*

As disclosed in Item 12 of the Disclosure Brochure, One Source, as a registered investment advisor, participates in institutional programs at various custodians and typically recommends these custodians to Clients for custody and brokerage services. There is no direct link between One Source's participation in these institutional programs and the investment advice it gives to its Clients, although One Source receives economic benefits through its participation in the institutional programs that are typically not available to retail investors. Please see Items 12 and 14.

### **Code of Ethics, Review of Accounts, Client Referrals, and Financial Information**

One Source has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with One Source. Complete details on the One Source Code of Ethics can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading in the Disclosure Brochure (included with this Wrap Fee Brochure).

#### Review of Accounts

Securities in Client accounts are monitored on a regular and continuous basis by Mr. Taylor, President of One Source. Please see Item 13 of the Disclosure Brochure (included with this Wrap Fee Brochure).

#### Other Compensation

Please see Item 14 – Other Compensation in the Disclosure Brochure (included with this Wrap Fee Brochure) for details on additional compensation that may be received by One Source or Mr. Taylor. Mr. Taylor's Brochure Supplement (also included with this Wrap Fee Brochure) provides details on outside business activities and the associated compensation.

#### Client Referrals from Solicitors

One Source does not engage paid solicitors for Client referrals.

#### Financial Information

Neither One Source, nor its management has any adverse financial situations that would reasonably impair the ability of One Source to meet all obligations to its Clients. Neither One Source, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. One Source is not required to deliver a balance sheet along with this Disclosure Brochure, as the firm does not collect advance fees of \$500 or more for services to be performed six months or more in advance.



## Privacy Policy

Effective: December 30, 2015

### Our Commitment to You

Voluntary Benefits Advisory Network, LLC d/b/a One Source Health & Wealth Management ("One Source" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

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

One Source does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

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

### What information do we collect from you?

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

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

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

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

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

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

### State-specific Regulations

|            |  |
|------------|--|
| California | In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws. |
|------------|--|

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

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

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (888) 268-8884.