

HOBERT & SVOBODA, INC.

WEALTH MANAGEMENT

INVESTMENT ADVISOR BROCHURE

Form ADV Part 2A

March 11, 2014

This Brochure (2A) provides information about the qualifications and business practices of Hobert & Svoboda, Inc. (H&S). Please contact H&S at (800) WLTH MGT (9584-648) or by email - info@hspdm.com with any questions about the contents of this Brochure. 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.

Hobert & Svoboda, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any specific level of skill or training. Additional information about H&S also is available on the SEC's website at www.adviserinfo.sec.gov.

**350 BISHOPS WAY, SUITE 206
BROOKFIELD, WISCONSIN 53005-6221
(262) 782-8900; (800) WLTH MGT
FAX (262) 782-4784
EMAIL: INFO@HSPDM.COM
WEBSITE: WWW.HSPDM.COM**

**At Hobert & Svoboda, Inc.,
we are committed to adding value through personalized objective advice
provided proactively.**

H&S

Item 2 - Material Changes

Annual Update

This Item requires us to summarize any material changes to our Form ADV Part 2A since our last annual update on March 7, 2013. While we made certain non-material changes throughout the Form, we do not believe that any of these changes were material.

If you have questions about this Form, please contact us at (262) 782-8900 or write us at:

Hobert & Svoboda, Inc.
Attn: Chief Compliance Officer
350 Bishops Way, St 206
Brookfield, WI 53005

Item 3 – Table of Contents

Item 1	- Cover Page _____	
Item 2	- Material Changes _____	1
Item 3	- Table of Contents _____	2
Item 4	- Advisory Business _____	3
Item 5	- Fees and Compensation _____	5
Item 6	- Performance-Based Fees and Side-by-Side Management _____	7
Item 7	- Types of Clients _____	7
Item 8	- Methods of Analysis, Investment Strategies and Risk of Loss _____	7
Item 9	- Disciplinary Information _____	9
Item 10	- Other Financial Industry Activities and Affiliations _____	9
Item 11	- Code of Ethics, Participation or Interest in Client Transactions and Personal Trading _____	10
Item 12	- Brokerage Practices _____	11
Item 13	- Review of Accounts _____	11
Item 14	- Client Referrals and Other Compensation _____	12
Item 15	- Custody _____	13
Item 16	- Investment Discretion _____	13
Item 17	- Voting Client Securities _____	14
Item 18	- Financial Information _____	14
	Client Privacy Policy Notice _____	14

Item 4 - Advisory Business

Description of Advisory Firm

Hobert & Svoboda, Inc. (H&S) is a SEC registered investment advisor firm located in Brookfield, WI. It was incorporated in 1982. The principal owners are Leonard T. Hobert and William J. Svoboda. The firm specializes in offering customized individually managed accounts through its Portfolio Design and Management Services (PDM) and also, retirement plan investment advisory services.

Portfolio Design and Management Services (PDM)

Throughout history, a major factor affecting one's quality of life has been his ability to acquire and manage financial resources. As H&S assists its clients in the management of their wealth, H&S's philosophy is that every client is entitled to honest, professional, and personalized service, and has the right to have his/her financial goals heard and understood - it is a responsibility taken quite seriously. Integrity, vision, and experience are some of the firm's characteristics that benefit our clients.

While portfolio optimization does not guarantee future results or that portfolio losses will not occur, it does provide a pro-active investment approach to money management which is capable of responding in a timely fashion to changes in investment objectives and market trends.

H&S believes that each client's situation is unique due to different risk/reward parameters, liquidity and income needs, and time horizons over which they measure performance. Therefore, each client's portfolio must reflect these differences. In developing proprietary models ranging from "Conservative" to "High Growth," each portfolio is designed and then managed to provide an optimum return relative to pre-established volatility parameters. This approach affords each client the opportunity to select a portfolio or portfolios with historical risk/return parameters that match their financial goals and objectives. When appropriate, H&S may employ "active management" styles whereby the advisor moves into individual funds to take part in market advances and then attempts to move to the safety of a cash equivalent fund, short-term bonds/treasuries, and/or specialized funds (such as inverse-funds) when markets decline. H&S will assess market conditions and decide which financial vehicles, assets and strategies to utilize while attempting to meet the client's investment objectives.

PDM Model Description of Portfolios*

CONSERVATIVE INCOME I PORTFOLIO (CGI).

The investment objective of the portfolio is to preserve capital while achieving modest growth in value over the long-term. The return objective over a five-year period is a "time weighted" annual compound rate of return of 1% above inflation. The risk objective is to limit the loss in portfolio value to 1% over any moving four quarter period. *The portfolio typically consist of funds that invest in government and high grade corporate bonds, in proportions deemed appropriate for the Portfolio by H&S. Based upon the judgment of H&S, a significant portion or all of the Portfolio may be invested in cash equivalent securities.*

CONSERVATIVE GROWTH PORTFOLIOS (CGII, CGIII).

The investment objective of the Conservative Growth portfolios is to preserve capital while achieving modest growth in value over the long-term. The return objective over a five year period is a "time weighted" annual compound rate of return of 2% to 4% above inflation. The risk objective is to limit the loss in portfolio value to between 6% and 11% over any moving four quarter period. *The portfolios typically consist of funds that invest in both stocks and bonds but are weighted towards bonds in proportions deemed appropriate for the Portfolio by H&S.*

Based upon the judgment of H&S, a significant portion or all of the Portfolio may be invested in cash equivalent and/or inverse equity funds.

MODERATE GROWTH PORTFOLIOS (MGI, MGII, MGIII).

The investment objective of the Moderate portfolios is to provide growth in value that is consistent with prudent investment risk over the long-term. The return objective over a five year period is a “time weighted” annual compound rate of return of 5% to 7% above inflation. The risk objective is to limit the loss in portfolio value to between 12% and 20% over any moving four quarter period. *The portfolios typically consist of funds that invest in both stocks and bonds but are weighted toward stocks in proportions deemed appropriate for the Portfolio by H&S. Based upon the judgment of H&S, a significant portion or all of the Portfolio may be invested in cash equivalent and/or inverse equity funds.*

HIGH GROWTH PORTFOLIOS (HG, HG Domestic, HG International).

The investment objective of the High Growth portfolios is to maximize growth in value over the long term. The return objective over a five year period is a “time weighted” annual compound rate of return of 8% above inflation. The risk objective is to limit the loss in portfolio value to between 21% and 25% (High Growth International – loss is portfolio value between 21% and 35%) over any moving four quarter period. *The portfolios typically consist of funds that invest primarily in stocks and, thus, will experience greater volatility than the Conservative and Moderate portfolios. Based upon the judgment of H&S, a significant portion or all of the Portfolio may be invested in cash equivalent and/or inverse equity funds.*

(*) There is no assurance that the structuring of portfolios using the PDM System will result in positive or negative returns falling within the parameters described above. Actual returns or losses may be significantly higher or lower than the percentages shown.

Retirement Plan Investment Advisory Services

H&S also offers levels of advisory services to retirement plans and to the participants of such plans (client). The services are designed to assist plan sponsors, plan trustees and investment committees in meeting their management and fiduciary obligations to Participants pursuant to the Employee Retirement Income and Securities Act (“ERISA”).

In general, these services may include the plan’s current investment platform, and assist the plan in creating an investment policy statement defining the types of investments to be offered and the restrictions that may be imposed, provide education services to plan participants, and monitor the performance of the plan’s investment vehicles. H&S will recommend changes in the plan’s investment vehicles as may be appropriate from time to time.

We may also assist with participant enrollment meetings and provide investment-related educational seminars to plan participants on such topics as; diversification, asset allocation, risk tolerance and time horizon. The participants are responsible for any individual investment selection under the plan. Our education seminars may include other investment-related topics specific to the particular plan.

Subject to negotiability, the compensation arrangement for these services will be based on a fixed fee or a percentage of assets. All terms, including the agreed upon fee and payment schedule, will be evidenced in the advisory agreement. Either party to the pension plan may terminate the H&S agreement upon 30-days’ written notice to the other party. The investment advisory fee will be prorated for the quarter in which the termination notice is given.

Assets under Management

As of December 31, 2013, Hobert & Svoboda Inc. manages approximately \$132,110,509 in assets; including retirement plans, individual, and other types of accounts.

Types of Securities

Hobert & Svoboda, Inc. believes that diversification is one of the keys to achieving long term investment success. PDM provides this diversification through the allocation of assets among various investments which may include, but not limited to, mutual funds, exchange-traded funds ("ETFs"), inverse and cash equivalent funds.

Under normal circumstances, fixed income securities include, but are not limited to, U.S. government/government agency, U.S. corporate, world bond funds; H&S may use other fixed income instruments to diversify a portfolio when applicable.

Equity asset classes include, but are not limited to, large cap, mid cap, small cap and international funds. In certain market conditions, H&S may include the use of "inverse funds," which aim to produce the inverse daily performance of the target index each day. They seek to increase in value when the market declines and decrease in value when the market rises. Investments are made across a wide range of markets and strategies. Clients should carefully read the prospectus, statement of additional information and periodic shareholder reports for further details on specific risks associated with investing in any of these securities.

While also specializing in the area of retirement accounts, H&S may offer other securities to help diversify a portfolio for its plan participants.

Item 5 - Fees and Compensation

Fees for Portfolio Design and Management (PDM) Advisory Services

The specific manner in which quarterly fees are charged by H&S varies by the Advisory program chosen. For H&S accounts, the specific manner in which fees are calculated are outlined in the client's H&S PDM Agreement. H&S will bill its fees on a calendar-quarterly basis; after services are provided, in accordance with the contract's schedule of fees as shown on "Addendum A:"

PDM Advisory Services Agreement: Addendum A

Fees for Services (1)

<u>Total Value of Portfolio (\$)</u>	<u>Based on Total Portfolio Value</u>
0 - 500,000	1.00%
500,001 - 1,000,000	0.75%
1,000,001 - 2,000,000	0.60%
2,000,001 - 10,000,000	0.45%

1. Fees more than \$10,000,000 negotiated based on size and type of account.

All fees will be based on the total value of assets in client's portfolio at the end of the quarter. One quarter of the annual fee will be deducted from the account in the month following each quarter end. All fees are subject to negotiation; fees may be reduced from the standard fee schedule for charitable organizations and foundations.

Quarterly fees are directly debited from the client accounts with client written authorization. If the client requests fees to be invoiced directly to client, they are due within thirty days of the invoice date. If H&S does not receive a client's fee within 45 days of the invoice date, client authorizes H&S to deduct the fees from the client's account. The fee schedule on "Addendum A" may be modified by H&S upon written notice to the client.

Accounts that are initiated during the calendar quarter will be charged a prorated fee. If the client terminates an account without the first 3 months of the account opening, the customary first quarter fee will be deducted from the account's assets for services rendered up to the date of termination. A client may terminate a PDM Agreement in writing at any time for any reason. Upon termination clients are obligated to compensate H&S for the balance of fees due (a pro-rated quarterly fee). For currently managed PDM accounts, if client withdraws a total of \$100,000 or more (or a substantial portion of the account's value) during the calendar quarter, H&S will access a prorated quarterly fee on the amount withdrawn.

H&S requires a minimum account of \$100,000 for PDM advisory services, although this may be negotiable under certain circumstances. H&S may group certain related client accounts for the purpose of achieving the minimum account size. The minimum annual fee per account is \$1,000 (this may vary if accounts are grouped together).

Fees for Retirement Plan Investment Advisory Services

In providing retirement plan investment advisory services, the "schedule of fees" is referenced below. All fees are subject to negotiation; as well as being based on a number of factors; including, but not limited to, asset size of plan and the participant base. The fee is payable quarterly and coordinated with the plan trustee(s) and the plan's third party administrator.

<u>Retirement Plan Investment Advisory Services</u>	
<u>Total Value of</u> <u>Portfolio (\$)</u>	<u>Amt of Annual Fee Based on</u> <u>Total Portfolio Value</u>
0 - 2,000,000	0.75%
2,000,001- 3,000,000	0.65%
3,000,001- 5,000,000	0.60%
5,000,001- 10,000,000	0.50%
10,000,001- 12,500,000	0.40%
12,500,001- 14,000,000	0.35%
14,000,001- 16,000,000	0.25%
16,000,001 +	0.15%
Each bracket is billed at the rate shown; fee structure is cumulative, not retroactive.	

Other Important Considerations

Hobert & Svoboda, Inc.'s advisory fees are exclusive of transaction fees (for example, ETFs), and other related costs and expenses which could be incurred by the client. When clients open a new account with H&S, clients should be aware that in the event that mutual funds or other securities are liquidated initially to open an H&S account to be managed, or sold thereafter while managing the account, substantial costs could be incurred. For example, securities with a low cost basis sold at a higher market value could result in substantial taxable capital gains. Also, to the extent that certain mutual fund classes are sold, such as "B Class" shares, deferred sales charges could occur with the liquidation.

Currently, discretionary managed accounts are custodied at Charles Schwab & Co., Inc. (Schwab). Schwab (and any other custodian) may impose certain charges when opening a new account, closing your account, wire transfers and other fees and taxes on brokerage accounts and security transactions. While the mutual funds that H&S generally purchase from Schwab are no-load, no-transaction fee funds, the fund may impose a "Contingent Redemption Fee (CRF)" which is a fee that is deducted when the fund is sold within a certain time period (usually 7 to 180 days). CRF fees are normally connected to fund asset classes that have higher market volatility (i.e. high yield bond, small cap and foreign funds). Clients should be aware that in addition to H&S's advisory fee, each mutual fund also has internal fees; a management fee (expense ratio) and/or a 12b1 fee (these fees are disclosed in a fund's prospectus). These fees will reduce the net asset value of the fund's shares. Some ETFs will also have a transaction fee when purchased/sold.

Clients should be aware that in order to purchase certain mutual funds, a minimum investment amount may be required by the mutual fund and Schwab's fund agreement. These minimum purchase amounts often require a minimum portfolio value large enough to cover the minimum purchase amounts.

Such charges, fees and commissions are exclusive of and in addition to Hobert & Svoboda's PDM advisory fee, and Hobert & Svoboda Inc. shall not receive any portion of these commissions, fees, and costs.

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

Neither Hobert & Svoboda, Inc. nor any of its Supervised Persons (employees) accepts performance-based fees (fees based on a share of capital gains or on capital appreciation of assets of a client). H&S does not use a performance-based fee structure.

Item 7 – Types of Clients

Hobert & Svoboda, Inc. provides investment advisory services to the following types of clients:

- Individuals, Personal Trusts and Estates
- Retirement Plans – 401(k) and other employee directed plans governed by the Employee Retirement Income Security Act of 1974 (ERISA)
- Corporations and Businesses – taxable business entities
- Non-profit Organizations & Foundations

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

Hobert & Svoboda, Inc. follows a disciplined research and evaluation process to determine appropriate investments for each model portfolio based on its target allocation. Along with this approach, H&S has the expertise and analytical tools from fund families and a wide range of investment managers.

Portfolio Objective Determination

The cornerstone of PDM is a process that recognizes the importance of each client's specific objectives and investment profile. The optimization process takes into account three major variables:

- The market volatility of each asset class including severity and duration of down periods and recovery periods for each asset class after a down period.
- The relationship between each asset class and every other asset class in terms of market behavior.
- The extent to which a particular investor is willing to incur risk; risk being defined as the probability of loss over any moving four quarter period.

The conservative, moderate, or high growth model portfolio best suited for each client is determined by identifying the client's risk/return objectives, and the time horizon for measuring results. This is done with the help of an Investment Strategy Questionnaire and a personal interview. The goals and objectives for each client are documented in our client relationship management system. Investment policy statements (IPS) are created that reflect the stated goals and objectives. Clients may not impose restrictions on investing in certain securities or types of securities.

PDM Methods of Analysis and Investment Strategies

H&S's methods of analysis include, charting analysis, fundamental analysis, technical analysis and cyclical analysis as well as technical research from financial publications and subscription materials prepared by technical and stock market analysts. Other sources of information include: Wall Street Journal, Bloomberg, Morningstar, and Charles Schwab research and market analysis.

PDM's investment strategies are usually implemented via a select core group of no-load, no transaction mutual funds and/or ETFs. In selecting funds for a client's portfolio, H&S looks for managers with distinct investment styles and uses a number of outside services to perform its initial due diligence. The quantitative screening of each Morningstar fund category significantly reduces the number of potential investments. From there, the qualitative standards are applied to create a preferred fund lineup as well as building a strong "backup" of secondary fund choices should the preferred funds close to new investors or fall in H&S's proprietary ranking system for any reason.

Investment selections in each asset class are evaluated based upon performance versus objective over various time periods. Quantitative factors used in the screening process include, but are not limited to; returns versus peer funds (1,3,5 Year total returns), volatility measures, return to risk measures (Sharpe Ratio), expense ratio and portfolio turnover. Evaluation of qualitative factors includes; management qualifications, tenure and consistency of investment philosophy/style, investment process/decision making procedures, style consistency and portfolio or sector concentration.

Other internal factors are also evaluated such as consistency of returns and the fund demonstrating consistent performance over market cycles versus episodic returns. Performance of each portfolio and the underlying funds are regularly monitored to assess whether the investments continue to meet H&S's criteria.

Risk of Loss

Our investment approach constantly keeps the risk of loss in mind. There is no assurance that the no-load mutual funds/ETFs will perform in any particular manner. Past performance of any mutual fund, ETF or asset class is not a guarantee of future performance. Clients should carefully read the prospectus of each mutual fund/ETF before they invest. Further, depending on the different type of investments, there may be varying degrees of risk:

- *Market Risk:* The price of a security may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Foreign Risk:* Investments in overseas markets (international securities) have special risks, including currency fluctuation and political risks, and such investments may be more volatile than that of a U.S. only investment. The risks are generally intensified for investments in emerging markets.

- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as "exchange rate risk".
- *Political and Legislative Risk:* Companies face a complex set of laws and circumstances in each country in which they operate. The political and legal environment can change rapidly and without warning, with significant impact, especially for companies operating outside of the U.S. or those companies who conduct a substantial amount of their business outside of the U.S.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* Your investments may also vary with the success and failure of H&S investment strategies, research, analysis of market conditions and of the type of portfolio securities. If H&S's strategies do not produce the expected returns, the value of the investments could decrease.

Item 9 – Disciplinary Information

Hobert & Svoboda, Inc. has no legal or disciplinary events that would be considered material to a client's or perspective client's evaluation of its advisory business or the integrity of its management.

Item 10 – Other Financial Industry Activities and Affiliations

Use of Discretion and Selection of Brokers and Other Compensation

When providing advice to PDM clients, each client grants H&S trading discretion to purchase and sell mutual funds and other securities in the client's account. Discretion allows the firm to purchase and sell securities in a client's account whenever it deems appropriate to do so. Should a trading error occur, it is H&S's policy to credit the client's account with any gain that stems from the error.

H&S recommends that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. (Schwab), a registered broker dealer, Member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. H&S is independently owned and operated and not affiliated with Schwab. Schwab provides H&S with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. Schwab's services include brokerage, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Clients with Schwab Institutional have their account assets automatically protected by insurance. The Securities Investor Protection Corporation (SIPC) provides up to \$500,000 per investor, with a limit of \$100,000 for claims of cash balances. In addition, Schwab provides through Lloyd's of London excess protection above this amount up to \$150 million per client for securities held within a client's portfolio.

H&S is not affiliated with Charles Schwab & Company, Inc. Services provided by Schwab to H&S do not increase transaction fees or commissions to H&S's clients. In the event of a trading error, Schwab's trading policy is to absorb the trading gain or loss if it is under \$100. If the gain is over \$100, Schwab will credit the client's account. If the loss is over \$100, Schwab will charge the loss to H&S.

Item 11 – H&S Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

Hobert & Svoboda, Inc. has adopted a Code of Ethics (the “Code”) for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things.

Hobert & Svoboda, Inc. anticipates that, in appropriate circumstances, consistent with clients’ investment objectives, it will cause accounts over which H&S has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which H&S, its affiliates and/or clients, directly or indirectly, may have a position of interest. H&S’s employees and persons associated with H&S are required to follow Code of Ethics. Subject to satisfying this policy and applicable laws, H&S officers/directors/employees and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for H&S’s clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of H&S will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code, certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of clients. In addition, the Code restricts trading in close proximity to client trading activity. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between H&S and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with H&S’s obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. H&S will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

It is H&S’s policy that the firm will not affect any principal or agency cross securities transactions for client accounts. H&S will also not cross-trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for H&S’s own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

H&S employees must acknowledge the terms of the Code of Ethics at least annually. Any individual not in compliance with the Code of Ethics may be subject to termination. H&S’s clients or prospective clients may request a copy of the firm’s Code of Ethics by contacting William Svoboda, Chief Compliance Officer.

Item 12 – Brokerage Practices

Selecting Brokerage Firms

For PDM client investment advisory accounts, H&S recommends that clients establish an account at Charles Schwab & Co., Inc. (Schwab), a registered broker dealer, member SIPC. The Custodian was suggested based on Schwab's domination in the mutual fund/ETFs marketplace, its comprehensive investment research tools and the insurance offered to protect client accounts.

For Retirement plans, H&S serves as investment adviser and uses an array of custodians to reflect the corporate and plan participant's needs; including Schwab Trust (a division of Charles Schwab & Co., Inc.), Fidelity Investments and other qualified platforms.

Soft Dollars

Charles Schwab & Co., Inc. makes available to H&S other products and services that benefit H&S but may not benefit its clients' accounts. Some of these other products and services assist H&S in managing and administering clients' accounts. Other products and services include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of H&S's fees from its clients' accounts, and assist with back-office functions, recordkeeping and client reporting.

Many of these services generally may be used to service all or a substantial number of H&S's accounts, including accounts not maintained at Schwab Institutional. Schwab Institutional also makes available to H&S other services intended to help H&S manage and further develop its business enterprise. Schwab's services may include (but are not limited to) consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, Schwab may make available, arrange and/or pay for these types of services rendered to H&S by independent third parties. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to H&S.

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

Item 13 – Review of Accounts

Account Reviews

Each PDM portfolio is closely reviewed and assets are periodically reallocated to maintain the optimum risk/reward balance. Such reviews are performed by each client's H&S representative. Annually, clients are asked to review their investment objective through a "suitability" review to insure on-going oversight of their account.

H&S provides each client receiving PDM services an easy to understand quarterly report detailing the performance of his/her investment portfolio. In addition to H&S' easy to read quarterly Portfolio Performance Report, the firm's sophisticated portfolio management software enables H&S to provide our clients with a wide variety of portfolio management reports. While the calendar is the main triggering factor, account reviews are also conducted due to a

client request, due to a change in client circumstances, account holdings or investment objectives or due to unusual market activity or economic conditions.

H&S, as a Retirement Plan Investment Advisor, acts in full cooperation with the company and the plan's trustees to provide detailed report activity and reviews as directed by management and the plan administrator.

PDM Account Reporting

Each month, the custodian provides clients with an account statement for each client account, which may include individual holdings, cost basis information, deposits and withdrawals, and income and dividends. In addition, the custodian provides clients with trade confirmation for each position bought and sold.

H&S urges clients to carefully review their statements and compare their official custodian records to the account statements provided by H&S. H&S's statements may vary from custodial statements based on accounting procedures, reporting dates, and/or valuation methodologies of certain securities.

Item 14 – Client Referrals and Other Compensation

Other Compensation

For additional discussion on other compensation received by H&S, please refer to Item 5, "Fees and Compensation" and Item 10, "Other Financial Industry Activities and Affiliations".

Client Referrals, Payments to Third Parties

H&S may from time to time compensate third parties for referring clients to H&S. Such referral fees are only paid pursuant to a written agreement with the referrer and are fully disclosed to the client in advance of H&S providing its services. If referral fees are paid, they are paid to the referrer from the published fees collected by H&S and do not increase costs to the client.

H&S has also received client referrals from Charles Schwab & Co., Inc. ("Schwab") through H&S's participation in the Schwab Advisor Network (the "Service"). The Service is designed to help investors find an independent investment advisor. Schwab is a broker-dealer independent of and unaffiliated with H&S. Schwab does not supervise H&S and has no responsibility for H&S's management of clients' portfolios or H&S's other advice or services. H&S pays Schwab fees to receive client referrals through the Service. H&S's participation in the Service may raise the potential conflicts of interest described below.

H&S pays Schwab a Participation Fee on all referred clients' accounts that are maintained in custody at Schwab and a Non-Schwab Custody Fee on all accounts that are maintained at, or transferred to, another custodian. The Participation Fee paid by H&S is a percentage of the fees the client owes to H&S or a percentage of the value of the assets in the client's account, subject to a minimum Participation Fee. H&S pays Schwab the Participation Fee for so long as the referred client's account remains in custody at Schwab. The Participation Fee is billed to H&S quarterly and may be increased, decreased or waived by Schwab from time to time. The Participation Fee is paid by H&S and not by the client. H&S has agreed not to charge clients referred through the Service fees or costs greater than the fees or costs H&S charges clients with similar portfolios who were not referred through the Service. The Participation Fee will be based on assets in accounts of H&S's clients who were referred by Schwab and those referred clients' family members living in the same household. Thus, H&S will have incentives to encourage household members of clients referred through the Service to maintain custody of their accounts and execute transactions at Schwab and to instruct Schwab to debit H&S's fees directly from the accounts.

For accounts of H&S's clients maintained in custody at Schwab, Schwab will not charge the client separately for custody but may receive compensation from H&S's clients in the form of commissions or other transaction-related compensation on securities trades executed through Schwab. Schwab also will receive a fee (generally lower than the applicable commission on trades it executes) for clearance, and settlement of trades executed through broker-dealers other than Schwab. Schwab's fees for trades executed at other broker-dealers are in addition to the other broker dealers' fees. Thus, H&S may have an incentive to cause trades to be executed through Schwab rather than another broker-dealer. H&S nevertheless acknowledges its duty to seek best execution of trades for client accounts.

Item 15 – Custody

PDM Client Custody – Fee Debiting

Hobert & Svoboda, Inc. has one form of custody in that clients may authorize H&S (per the PDM Agreement) to have advisory fees deducted from the client's account at the broker dealer, bank or other qualified custodian. The custodian is advised in writing of the limitation of H&S's access to the account. The custodian will send a statement (either through the mail or paperless) directly to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to H&S.

While H&S will assist clients in establishing and maintaining accounts at the custodian, H&S will not take physical custody of client funds or securities. H&S shall have no responsibility or liability with respect to custodial arrangements or the acts, omissions or other conduct of the custodian.

Account Statements

All assets are held at qualified custodians. Custodians will provide account statements directly to clients at their address of record at least quarterly.

As described in Item 13, "Review of Accounts," clients will receive at least quarterly, statements from the custodian that holds and maintains client's investment assets. Clients are urged to carefully review such statements and compare official custodian records to the account statements or other reports that H&S provides. Statements provided by H&S may vary from custodian statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

Discretionary Authority for Trading

Hobert & Svoboda, Inc. accepts discretionary authority from the client at the outset of an advisory relationship. This authority, as defined in the PDM Agreement, allows H&S to select the identity and amount of securities to be bought and sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

Limited Power of Attorney

Through the PDM Agreement, H&S may accept limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows H&S to execute trades on behalf of clients. When such limited powers exist between H&S and the client, H&S has the authority to determine, without obtaining specific client consent, both the amount and type of securities to be bought to satisfy client account objectives. Additionally, H&S

may accept any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to H&S in writing.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, Hobert & Svoboda, Inc. does not have any authority to and does not vote proxies on behalf of advisory clients. All proxies are sent directly to the client. Clients are instructed to read through the information provided with the proxy-voting documents and make a determination based on the information provided. Clients have the ultimate responsibility for receiving and voting proxies and any legal proceedings for securities maintained in their portfolios; clients are also made aware of corporate actions directly from either custodians or transfer agents.

H&S does not render advice to or take any actions on behalf of clients with respect to any legal proceedings, including bankruptcies and shareholder litigation.

Item 18 – Financial Information

Hobert & Svoboda, Inc. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Client Privacy Policy Notice

H&S is committed to the privacy of your information and will use strict standards to safeguard it. When clients employ Hobert & Svoboda, Inc. as their investment advisor, they entrust H&S not only with their assets, but also with their personal financial data. H&S considers all information to be private and confidential, and we will hold ourselves to the highest standard of trust and fiduciary duty in its safekeeping of information. Protecting your privacy is important to us. H&S wants its clients to understand what information is collected and it is used.

H&S collects only information that is needed to serve clients and administer its business. In the process of serving clients, H&S becomes stewards of certain “nonpublic personal information” – information about you that is not available publicly. The clients’ information collected and stored generally consists of the following:

- Information clients provide directly or indirectly to H&S on applications or other forms, correspondence or through conversations (such as name, social security number, home or business address, an e-mail address, phone number, assets, income, date of birth, occupation, etc.)
- Information related to client transactions with H&S (such as account numbers, account balances, transaction details and other financial information)
- Information received from third parties such as broker statements, custodial statements and trade confirmations

H&S limits the collection and use of information about clients to that which is necessary to administer its business and serve its clients.

In order to protect client privacy, we carefully control the way in which any information about clients is shared. H&S does not disclose information about its clients or former clients to anyone, except as necessary in the management of the account and as permitted or required by law.

H&S is permitted by law to disclose some or all of the information we collect as described above to other advisers, custodians, brokers, administrators or any firms that assist us in maintaining and supporting the financial products

and services provided to its clients. For example, custodians may require information to process security transactions for a client's account.

H&S is committed to the privacy and security of current and former client nonpublic personal information and will use strict security standards to safeguard it. Our employees are held accountable for adhering to strict policies and procedures to prevent any misuse of client nonpublic personal information. Employees are bound by this privacy policy and are educated and trained annually on the implementation of our security principles and practices.

Information Security Program - Hobert & Svoboda, Inc. maintains an information security program to reduce the risk that client personal and confidential information may be breached and to ensure that your information is not placed at unreasonable risk. H&S has implemented security standards and processes - including, electronic and procedural safeguards - to ensure that access to customer information is limited to employees and registered investment representatives.