

The Optimized RIA, Inc.
d/b/a
Blue Duck Wealth Management

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Roswell, GA 30076

Telephone: 800-250-5930

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**FORM ADV PART 2A
BROCHURE**

This brochure provides information about the qualifications and business practices of Blue Duck Wealth Management. If you have any questions about the contents of this brochure, contact us at 800-250-5930. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Blue Duck Wealth Management is available on the SEC's website at www.adviserinfo.sec.gov.

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

Item 2 Summary of Material Changes

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

Blue Duck Wealth Management has the following material changes to report. Material changes relate to Blue Duck Wealth Management's policies, practices or conflicts of interests.

- Blue Duck Wealth Management has updated Description of Firm (Item 4)
 - *The Optimized RIA, Inc d/b/a Blue Duck Wealth Management is a registered investment adviser primarily based in Roswell, GA.*
- Blue Duck Wealth Management has updated Portfolio Management Services (Item 5)
 - *Fees range from 50 to 80 bps with the remainder payable to our firm.*
- Blue Duck Wealth Management has updated Arrangements with Affiliated Entities (Item 10)
 - *HCM is an investment adviser to The HCM Income Plus Fund*
 - *Certain Blue Duck Wealth Management representatives are licensed as insurance agents*
- Blue Duck Wealth Management has updated Affiliates (Item 11)
 - *HCM affiliated with through common control and ownership to The HCM Income Plus Fund*
- Blue Duck Wealth Management has updated Client referrals (Item 14)
 - *HCM Updated monthly advisor support fee guidelines*

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Item 4 Advisory Business

Description of Firm

The Optimized RIA, Inc d/b/a Blue Duck Wealth Management is a registered investment adviser primarily based in Roswell, GA. We are organized as a corporation under the laws of the State of Texas. We have been providing investment advisory services since January 2016. We are owned by Ronald Vance Howard.

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

Portfolio Management Services

We offer non-discretionary portfolio management services through third party money managers ("TPMMs"). After gathering information about your financial situation and objectives, we will recommend that you use the services of a third-party money manager ("TPMM") to manage your investment portfolio. Factors that we take into consideration when making our recommendation(s) include, but are not limited to, the following: the TPMM's performance, methods of analysis, fees, your financial needs, investment goals, risk tolerance, and investment objectives. We will monitor the TPMM(s)' performance to ensure its management and investment style remains aligned with your investment goals and objectives. The TPMM may use one or more of their model portfolios to manage your account. We will periodically monitor the performance of your accounts managed by TPMM(s). Clients whose assets are invested in portfolios managed by TPMMs may not set restrictions on the specific holdings or allocations within the model, nor the types of securities that can be purchased in the portfolio. We primarily recommend the investment advisory services of Howard Capital Management, Inc., a registered investment adviser affiliated with our firm through common control and ownership; however, we may recommend other TPMMs.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. These services are based on fixed fees and the final fee structure is documented in Exhibit II of the Financial Planning Agreement. Generally we include financial planning as part of our portfolio management services. We will provide financial planning as a separate service upon request.

We may also recommend non-portfolio management services offered by HCM such as HCM 401(k) Optimizer® and MYFEDLIFE products, for which we will receive a referral fee.

Types of Investments

We primarily recommend third party money managers; however, we may also offer advice on equity securities, mutual fund shares, and other types of investments based on your stated goals and objectives, as well as any type of investment held in your portfolio at the inception of our advisory relationship.

Assets Under Management

We do not manage assets on a continuous basis; therefore, we do not have regulatory assets under management to report.

Item 5 Fees and Compensation

Portfolio Management Fees

We will share in the advisory fee you pay directly to the TPMM which is a combination of our fee and the TPMM fee. The combined investment advisory fee you pay to the TPMM and our firm is based on a percentage of your assets under management with the TPMM. The annualized combined fee (our fee and the TPMM's fee) generally ranges up to 2.5%. Fees range from 50 to 80 bps with the remainder payable to our firm.

For accounts referred to TPMMs, the portion of the fee payable to our firm will vary; however, you will not pay a higher fee than 2.5% which is inclusive of the Blue Duck fee and the TPMM fee. The advisory fee you pay to the TPMM is established and payable in accordance with the disclosure brochure and contract provided by each TPMM to whom you are referred. These fees may or may not be negotiable. You should refer to the TPMM's disclosure brochure for information on their services and fees. Fees are typically payable either monthly or quarterly in advance, depending on the particular client's agreement. We also have an incentive to recommend Howard Capital Management, Inc. due to our affiliation with the firm.

Since our compensation may differ depending upon the individual agreement we have with each TPMM, a conflict of interest exists where our firm or persons associated with our firm has an incentive to recommend one TPMM over another TPMM with whom we have more favorable compensation arrangements or other advisory programs offered by TPMMs with whom we have less or no compensation arrangements.

You will be required to sign an agreement directly with the recommended TPMM(s). You may terminate your advisory relationship with the TPMM according to the terms of your agreement with the TPMM. You should review each TPMM's brochure for specific information on how you may terminate your advisory relationship with the TPMM and how you may receive a refund, if applicable. You should contact the TPMM directly for questions regarding your advisory agreement with the TPMM.

For accounts referred to Howard Capital Management, Inc., a one-time only 3% set up fee will be billed to each new account with a balance below \$10,000 at the time of the initial billing. Such fee is negotiable

Financial Planning Fees

The rate for creating client financial plans is between \$500 and \$5,000. Clients will be billed directly. Fees are paid in advance, but never more than six months in advance. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. Clients may terminate their contracts without penalty within five business days of signing the advisory contract.

Additional Fees and Expenses

As part of our investment advisory services to you, we may recommend that you invest in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To

fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, refer to the *Brokerage Practices* section of this brochure.

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

We do not accept performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of a capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Our fees are calculated as described in the *Fees and Compensation* section above, and are not charged based on a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Item 7 Types of Clients

We offer investment advisory services to individuals, high net-worth individuals, corporations, and other business entities. In general, we do not require a minimum dollar amount to open and maintain an advisory account; however, we have the right to terminate your account if it falls below a minimum size which, in our sole opinion, is too small to manage effectively. For accounts referred to Howard Capital Management, Inc., a one-time only 3% set up fee will be billed to each new account with a balance below \$10,000 at the time of the initial billing. Such fee is negotiable.

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

Our Methods of Analysis and Investment Strategies

We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

Selection of Other Advisers - We advise you on how to allocate your assets among various classes of securities or third party money managers including mutual fund managers. In these situations, we primarily rely on investment portfolios and strategies developed by the third-party money managers and their portfolio managers. We may replace/recommend replacing a third-party money manager if there is a significant deviation in characteristics or performance from the stated strategy and/or benchmark.

Charting Analysis - involves the gathering and processing of price and volume pattern information for a particular security, sector, broad index or commodity. This price and volume pattern information is analyzed. The resulting pattern and correlation data is used to detect departures from expected performance and diversification and predict future price movements and trends.

Risk: Our charting analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Technical Analysis - involves studying past price patterns, trends and interrelationships in the

financial markets to assess risk-adjusted performance and predict the direction of both the overall market and specific securities.

Risk: The risk of market timing based on technical analysis is that our analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Fundamental Analysis - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company and its industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

Risk: The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Long-Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Risk: Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.

Short-Term Purchases - securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

Risk: Using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short-term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. There are many factors that can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of times.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial information, liquidity needs and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio. **It is important that you notify us immediately with respect to any material changes to your financial circumstances, including for example, a change in your current or expected income level, tax circumstances, or employment status.**

Tax Considerations

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you consult with a tax professional regarding the investing of your assets.

Moreover, custodians and broker-dealers must report the cost basis of equities acquired in client accounts on or after January 1, 2011. Your custodian will default to the First-In First-Out ("FIFO") accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Recommendation of Particular Types of Securities

We recommend various types of securities and we do not primarily recommend one particular type of security over another since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with the investment. A description of the types of securities we may recommend to you and some of their inherent risks are provided below.

Stocks: There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and, the overall health of the economy. In general, larger, better established companies ("large cap") tend to be safer than smaller start-up companies ("small cap") are but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

Mutual Funds and Exchange Traded Funds: Mutual funds and exchange traded funds ("ETF") are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. ETFs differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

Item 9 Disciplinary Information

We are required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management. We do not have any required disclosures under this item.

Item 10 Other Financial Industry Activities and Affiliations

Arrangements with Affiliated Entities

We are affiliated with Howard Capital Management, Inc. ("HCM"), a registered investment adviser, through common control and ownership. When recommending the services of third party money managers, we primarily recommend HCM; however, we may recommend other third party money managers as appropriate and suitable for your needs. Our advisory services are separate and distinct from the fees paid to HCM for their services. Under a referral arrangement between our firm and HCM, our firm will receive compensation from HCM for investment advisory clients. This referral arrangement presents a conflict of interest because we have a financial incentive to recommend HCM's services. We will also receive compensation from any third-party money manager for recommending that you use their services. These compensation arrangements present a conflict of interest because we have a financial incentive to recommend the services of the third-party adviser. While we believe that compensation charged by HCM and other recommended third party money manager is competitive, such compensation may be higher than fees charged by other firms providing the same or similar services. You are under no obligation to use the services of any firm we recommend, whether affiliated or otherwise, and may obtain comparable services and/or lower fees through other firms.

HCM is the investment adviser to three registered investment companies, the HCM Tactical Growth Fund and the HCM Dividend Sector Plus Fund and the HCM Income Plus Fund ("the Funds"). The Funds are managed on a day to day basis by Vance Howard, CEO of HCM and sole owner of our firm. We may recommend that you invest in these Funds. The recommendation to invest in the Funds presents a conflict of interest because we have a direct or indirect financial incentive to recommend the Funds. While we believe that compensation charged by the Funds may be competitive, such compensation may be higher than fees charged by other Funds. You are under no obligation to invest in the Funds.

We also have representatives who are licensed insurance agents and will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products and compensation can conflict with the fiduciary duties of a registered investment adviser. However, Blue Duck Wealth Management always acts in the best interest of the client and clients are not required to utilize the services of representatives in their capacity as insurance agents.

Christopher Joseph White is a registered representative. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Blue Duck Wealth Management always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services any representative of Blue Duck Wealth Management in such individual's outside capacity.

Christopher Joseph White is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties

of a registered investment adviser. Blue Duck Wealth Management always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Blue Duck Wealth Management in their capacity as a licensed insurance agent.

Stanley Darrell Keathley is a registered representative. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Blue Duck Wealth Management always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services any representative of Blue Duck Wealth Management in such individual's outside capacity.

Stanley Darrell Keathley is an accountant. From time to time, he will offer clients advice or products from this activity. Blue Duck Wealth Management always acts in the best interest of the client. Clients are in no way required to utilize the services of any representative of Blue Duck Wealth Management in their capacity as an accountant.

Stanley Darrell Keathley is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Blue Duck Wealth Management always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Blue Duck Wealth Management in their capacity as a licensed insurance agent.

Philip Louis Richardson is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Blue Duck Wealth Management always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Blue Duck Wealth Management in their capacity as a licensed insurance agent.

Insurance Agent I get commissions Tax Preparer no commission Medicaid Planner no commission College Planner no commission

Joseph Leva is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Blue Duck Wealth Management always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Blue Duck Wealth Management in their capacity as a licensed insurance agent.

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

Description of Our Code of Ethics

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code

of Ethics includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All persons associated with our firm are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

Participation or Interest in Client Transactions

Howard Capital Management, Inc. ("HCM"), a registered investment adviser with whom we are affiliated with through common control and ownership, is the investment adviser to the HCM Tactical Growth Fund, the HCM Dividend Sector Plus Fund and the HCM Income Plus Fund ("the Funds"), registered investment companies ("mutual funds") in which you may be solicited to invest. Persons associated with our firm and HCM may have significant investments in the Fund. This presents a conflict of interest because we have a financial incentive to recommend these Funds to you due to our affiliation with HCM. However, you are under no obligation to invest in either Fund. If you are an investor in the Funds, please refer to the Funds' prospectus for detailed disclosures regarding the Fund.

Personal Trading Practices

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our Associated Persons nor our firm shall have priority over your account in the purchase or sale of securities.

Item 12 Brokerage Practices

When we recommend that you use the services of a third-party money manager, the third party money manager will recommend, or require that you use, certain broker/dealer and custodians. Please refer to the third-party money manager's Form ADV Disclosure Brochure for information on the broker/dealers and custodians they recommend. We do not recommend particular brokers/dealers for custodial and/or brokerage services.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash compensation.

Item 13 Review of Accounts

The IAR responsible for your account will monitor your account periodically. He or she will monitor the performance of your account and, if applicable, the third-party money manager responsible for managing your account. No less than annually, we will evaluate changes in your investment objectives to evaluate continuing suitability of the investments and/or third party money manager.

You will receive trade confirmations and monthly or quarterly statements from your account custodian(s). We may assist you in interpreting and/or compiling statements/reports and transferring relevant information onto the appropriate place on your financial statements as part of the review

process.

Item 14 Client Referrals and Other Compensation

We receive compensation from Howard Capital Management, Inc. ("HCM"), an affiliated registered investment adviser, for referring clients to them. This referral arrangement presents a conflict of interest because we have a financial incentive to recommend HCM's services. While we believe that compensation charged by HCM and other recommended third party money manager is competitive, such compensation may be higher than fees charged by other firms providing the same or similar services. You are under no obligation to use the services of any firm we recommend, whether affiliated or otherwise, and may obtain comparable services and/or lower fees through other firms. Our referral arrangement with HCM will not cause you to pay more in advisory fees than you would otherwise pay had there been no solicitor's compensation. All referral fees paid to our firm represent a portion of the fees actually charged to you by HCM for investment advisory services. There is no differential between the amount or level of investment advisory fees that HCM will charge for managing the client account(s) in excess of that which they would customarily charge for managing any other new client's account with similar assets and which was not referred to HCM by our firm.

Item 15 Custody

We do not have physical custody of any of your funds and/or securities. If your account is managed by a recommended third party money manager, the third-party money manager will calculate the advisory fees and will instruct the custodian to debit the advisory fee. Your funds and securities will be held with a bank, broker-dealer, or another qualified custodian. You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

Item 16 Investment Discretion

Form ADV Part 2A requires registered investment advisers to disclose whether or not they accept discretionary authority to manage client accounts. We do not provide discretionary management services.

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

Item 17 Voting Client Securities

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the

event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitations to vote proxies.

Item 18 Financial Information

We have not filed a bankruptcy petition at any time in the past ten years.

Item 19 Requirements for State-Registered Advisers

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

Item 20 Additional Information

Your Privacy

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

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

FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING – OPTING OUT

Federal law allows you the right to limit the sharing of your NPI by “opting-out” of the following: sharing for non-affiliates’ everyday business purposes – information about your creditworthiness; or sharing with affiliates or non-affiliates who use your information to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately if you choose to opt out of these types of sharing.

We restrict internal access to non-public personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your non-public personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

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

If you decide to close your account(s) we will adhere to our privacy policies, which may be amended from time to time.

If we make any substantive changes in our privacy policy that would further permit or require disclosures of your private information, we will provide written notice to you. Where the change is based on permitted disclosures, you will be given an opportunity to direct us as to whether such disclosure is acceptable. Where the change is based on required disclosures, you will only receive written notice of the change. You may not opt out of the required disclosures.

If you have questions about our privacy policies, contact our main office at the telephone number on the cover page of this brochure and ask to speak to the Chief Compliance Officer.

Class Action Lawsuits

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