

# **JJCC Financial, Inc.**

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

**Effective: February 21, 2017**

This Form ADV 2A (Disclosure Brochure) provides information about the qualifications and business practices of JJCC Financial, Inc. ("JJCC"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (978) 793-1748.

JJCC is a registered investment advisor with the State of Texas. 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 about JJCC to assist you in determining whether to retain the Advisor.

Additional information about JJCC and its advisory persons are available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 287531.

**JJCC Financial, Inc.**  
**2117 Wychwood Drive, Austin, TX 78746**  
**Phone: (978) 793-1748**

## **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 JJCC.

JJCC believes that communication and transparency are the foundation of our relationship and continually strive to provide our Clients with the complete and accurate information at all times. We encourage 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

- Disciplined Wealth Strategies, Inc. changed its legal name to JJCC Financial, LLC in February 2017.
- JJCC is transitioning to registration with the State of Texas from the U.S. Securities and Exchange Commission. The Advisor will provide investment management and related services through Commonwealth Financial Network and not under JJCC. JJCC will provide financial planning and consulting services. Please see Items 4 and 10.
- John T. Blood has affiliated with Commonwealth Financial Network as an investment advisor representative. Please see Item 10.

### 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 JJCC.

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 with our firm name or our CRD# 287531. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (978) 793-1748.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

JJCC Financial, Inc. (“JJCC” or the “Advisor”) is a registered investment advisor with the State of Texas, which is organized as a Corporation under the laws of Texas. JJCC was founded in November 2012 as a registered investment advisor under the name Disciplined Wealth Strategies, Inc. (“DWS”). The assets and clients of DWS were acquired in January 2016. In February 2017, DWS changed its legal name to JJCC Financial, LLC and became a registered investment advisor. JJCC is owned and operated by John T. Blood (President). This Disclosure Brochure provides information regarding the qualifications, business practices, and the financial planning and consulting services provided by JJCC.

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

JJCC offers financial planning and consulting services to individuals, high net worth individuals, and other types of clients (each referred to as a “Client”). For investment management services, JJCC has selected Commonwealth Financial Network (“Commonwealth”) as a partner to enable the delivery of these services. Mr. Blood, in his separate capacity as an investment advisor representative with Commonwealth, will assist Clients with implementation of recommendations and ongoing investment management services. Please see Item 10.

JJCC 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 for clients 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, cash flow planning, executive compensation, 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. JJCC may also refer Clients to an accountant, attorney or another 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.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. Clients may be offered additional services for the implementation and/or ongoing investment management of the Clients assets. These services are provided by Mr. Blood in his separate capacity as an investment advisor representative of Commonwealth. Please see Item 10. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to execute the transaction through the Advisor or Mr. Blood.

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

Prior to engaging JJCC to provide financial planning and consulting services, each Client is required to enter into a financial planning agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client.

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

JJCC does not manage assets and does not place Client assets into a wrap fee program.

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

JJCC does not manage assets and therefore has no disclosures to make.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for JJCC's services. Each Client shall sign a financial planning agreement that details the responsibilities of JJCC and the Client.

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

JJCC offers financial planning services at an hourly rate of up to \$250 per hour or for a fixed engagement fee. Clients may also be offered services based on an annual financial planning engagement. Fixed fee engagements are negotiated based on the expected number of hours to complete the engagement at the negotiated hourly rate. Annual retainers are charged at an annual rate of up to \$15,000, billed quarterly in advance. Fees may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours and/or costs will be determined prior to establishing the advisory relationship.

### **B. Fee Billing**

Project-based financial planning and consulting fees are invoiced up to 50% of the expected cost of the engagement upon execution of the financial planning agreement and the balance upon the completion of the agreed upon deliverable[s]. Annual retainer engagements are billed quarterly, in advance of each calendar quarter.

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

Clients may incur certain fees or charges imposed by third-parties for the implementation of investment recommendations. The Client is responsible for all custody and securities execution fees charged by the custodian and executing broker-dealer. The financial planning fee charged by JJCC is separate and distinct from these costs. In addition, all fees paid to JJCC for its 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.

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

JJCC may be partially compensated for its services at the start of an engagement. Either party may terminate the planning agreement with JJCC, at any time, by providing written notice to the other party. Upon termination, the Client shall be billed for actual hours logged on the planning project times the agreed upon hourly rate or the percentage completed for a fixed fee engagement. For annual retainer engagements, the Client shall be responsible for fees up to and including the effective date of termination as a percentage of the days in the quarter for which the agreement was in effect. Upon termination, any unearned, prepaid fees will be promptly refunded to the Client. In addition, the Client may terminate the agreement within five business (5) 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. The Client's financial planning agreement with the Advisor is non-transferrable without the Client's prior consent.

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

JJCC does not buy or sell securities to generate commission and does not receive any compensation for securities transactions in any Client account, other than the financial planning fees noted above. As noted above, Mr. Blood is also an investment advisor representative with Commonwealth. In his separate capacity with Commonwealth, Mr. Blood may implement investment management recommendations. Please see Item 10 for additional details.

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

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JJCC does not charge performance-based fees for its investment advisory services. The fees charged by JJCC 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. JJCC 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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JJCC provides investment advisory services individuals, high net worth individuals, and other types of Clients. JJCC generally does not impose a minimum account size for establishing a relationship.

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

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

Financial plans and related advice are tailored to the unique needs of each Client after gaining a full understanding of the Client's goals, financial situation, time horizon, tolerance for investment risk and other factors. The Advisor may use financial modeling software and other tools to assist in developing strategies for its Clients.

### **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. JJCC will assist Clients in determining an appropriate financial 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. The risks associated with a particular strategy are provided to each Client as part of the financial planning 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 JJCC or any of its owner.** JJCC values 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 in which you partner. Our firm background is available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 287531. You may also research the background of John T. Blood by searching with his full name or his Individual CRD# 4270742.

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

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### Commonwealth Affiliation

Mr. Blood also serves as an investment advisor representative ("IAR") with Commonwealth Financial Network, an SEC-registered investment advisor and registered broker-dealer, member FINRA/SIPC (herein "Commonwealth"). In Mr. Blood's separate capacity as an IAR of Commonwealth, Mr. Blood will receive advisory fees for Clients whose accounts and relationships are serviced under the Commonwealth RIA. Mr. Blood will not receive ongoing investment advisory fees under JJCC for these accounts.

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

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

JJCC has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with JJCC. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. JJCC and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of JJCC associates 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 may include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. JJCC has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (978) 793-1748.

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

JJCC and its owner may purchase or sell the same securities that may be recommended to Clients. JJCC does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advice an investment company. JJCC does not have an interest in any securities recommended to Clients.

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

While JJCC and Mr. Blood may also purchase or sell the same securities that may be recommended to Clients, neither JJCC or Mr. Blood will ever trade in their accounts to the detriment of any Client. JJCC maintains a Code of Ethics that defines our responsibility as a fiduciary to ensure that Client interest are always placed above our own. When JJCC or Mr. Blood purchase or sell any securities that is also recommended Clients, our trades will be placed only after Client orders have been placed and filled. Further, Mr. Blood is also subject to the Code of Ethics and Personal Trading policies and reviews by Commonwealth.

## **Item 12 – Brokerage Practices**

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

JJCC does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer or custodian to safeguard Client assets. The Client may separately engage Mr. Blood to assist with the implementation and management of Client accounts through Commonwealth. As an IAR with Commonwealth, Mr. Blood is restricted from managing Client accounts or implementing investments away from Commonwealth, unless specific prior approval is obtained. Therefore, JJCC and Mr. Blood will typically recommend Commonwealth and its clearing firm, National Financial Services LLC for the implementation of investment recommendations.

Clients will be required to enter into a separate agreement with Commonwealth and Mr. Blood for these services.

## **Item 13 – Review of Accounts**

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

Clients that engage JJCC for an ongoing financial planning retainer will be eligible for periodic meetings with the Advisor and reviews of various financial matters during the engagement. For project-based planning and consulting services, the Client may engage the Advisor for an additional review at any time.

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

Clients may request reviews at any time. Ongoing retainer Clients will be reviewed at least annually.

### **C. Review Reports**

JJCC does not send regular reports to its Clients. For Clients that engage under an annual retainer, the financial plan and other engagement deliverables may be updated as per the terms of the financial planning agreement. Clients who have implemented their investments through Mr. Blood's separate affiliations with Commonwealth will receive reports and information from Commonwealth, pursuant to the terms of the agreement[s] with Commonwealth.

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

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### **A. Compensation Received by JJCC**

JJCC is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. JJCC does not receive commissions or other compensation from product sponsors, broker dealers or any un-related third party. JJCC may refer Clients to various third-parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, JJCC may receive referrals of new Clients from a third-party.

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

JJCC does not engage paid solicitors for Client referrals.



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## Item 15 – Custody

JJCC does not accept or maintain custody of any Client accounts.

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## Item 16 – Investment Discretion

JJCC does not provide investment management services and therefore does not assume investment discretion over any Client accounts.

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## Item 17 – Voting Client Securities

JJCC does not accept proxy-voting responsibility for any Client. 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 JJCC, nor its management has any adverse financial situations that would reasonably impair the ability of JJCC to meet all obligations to its Clients. Neither JJCC, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. JJCC is not required to deliver a balance sheet along with this Brochure as the firm does not collect advance fees 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 Officer

The President and Chief Compliance Officer of JJCC is John T. Blood. Information regarding the formal education and background of Mr. Blood is included in his ADV 2B below.

### B. Other Business Activities of Principal Officer

#### Commonwealth Affiliation

Mr. Blood also serves as an investment advisor representative (“IAR”) with Comonwelath Financial Network, an SEC-registered investment advisor and registered broker-dealer, member FINRA/SIPC (herein “Commonwealth”). In Mr. Blood’s separate capacity as an IAR of Commonwealth, Mr. Blood will receive advisory fees for Clients whose accounts and relationships are serviced under the Commonwealth RIA. Mr. Blood will not receive ongoing investment advisory fees under JJCC for these accounts.

### C. Performance Fee Calculations

JJCC does not charge performance-based fees for its investment advisory services. The fees charged by JJCC 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 JJCC or Mr. Blood.*** Neither JJCC nor Mr. Blood has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against JJCC or Mr. Blood.

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 JJCC or Mr. Blood.***

### E. Material Relationships with Issuers of Securities

Neither JJCC nor Mr. Blood has any relationships or arrangements with issuers of securities.



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

**for**

**John T. Blood  
President and Chief Compliance Officer**

**Effective: February 21, 2017**

This Form ADV 2B (Brochure Supplement) provides information about the background and qualifications of John T. Blood (CRD# **4270742**) in addition to the information contained in the JJCC Financial, Inc. ("JJCC" or the "Advisor" - CRD #287531) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the JJCC Disclosure Brochure or this Brochure Supplement, please contact us at (978) 793-1748.

Additional information about Mr. Blood 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

The President and Chief Compliance Officer of JJCC is John T. Blood. Mr. Blood, born in 1968, is a dedicated Portfolio Manager for Client accounts of JJCC. Mr. Blood earned a Masters in Business Administration from Boston College in 2003. Mr. Blood earned a Bachelor of Science in Mechanical Engineering from Rensselaer Polytechnic Institute in 1990. Mr. Blood earned a Masters of Science in Finance from Boston College in 2003. Additional information regarding Mr. Blood's employment history is included below.

### Employment History:

President and Chief Compliance Officer, JJCC Financial, Inc.	02/2017 to Present
Investment Advisor Representative, Commonwealth Financial Network	02/2017 to Present
Investment Advisor Representative, Efficient Advisors, LLC	01/2016 to 02/2017
Chief Executive Officer, Disciplined Wealth Strategies, Inc.	02/2013 to 02/2017
Vice Chief Executive Officer, DFA Securities, LLC	01/2010 to 02/2013
Vice Chief Executive Officer, Dimensional Fund Advisors LP	01/2010 to 02/2013
Chief Market Strategist, Commonwealth Financial Network	09/2000 to 12/2009

## Item 3 – Disciplinary Information

***There are no legal, civil or disciplinary events to disclose regarding Mr. Blood.*** Mr. Blood 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. Blood.

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. Blood.***

However, we do encourage you to independently view the background of Mr. Blood on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4270742.

## Item 4 – Other Business Activities

### Commonwealth Affiliation

Mr. Blood also serves as an investment advisor representative ("IAR") with Commonwealth Financial Network, an SEC-registered investment advisor and registered broker-dealer, member FINRA/SIPC (herein "Commonwealth"). In Mr. Blood's separate capacity as an IAR of Commonwealth, Mr. Blood will receive advisory fees for Clients whose accounts and relationships are serviced under the Commonwealth RIA. Mr. Blood will not receive ongoing investment advisory fees under JJCC for these accounts.

## Item 5 – Additional Compensation

Mr. Blood receives additional compensation for the business activities described in Item 4 above.

## Item 6 – Supervision

Mr. Blood serves as the President and Chief Compliance Officer of JJCC. Mr. Blood can be reached at (978) 793-1748. JJCC has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of JJCC. Further, JJCC is subject to regulatory oversight by various agencies. These agencies require registration by JJCC and its employees. As a registered entity, JJCC is subject to examinations by regulators, which may be announced or unannounced. JJCC 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. Blood does not have any additional information to disclose.

## Privacy Policy

Effective: February 21, 2017

### Our Commitment to You

JJCC Financial, Inc. ("JJCC" 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. JJCC (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.

JJCC 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> 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> JJCC 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 JJCC 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> 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> JJCC 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

### 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 (978) 793-1748.