

Item 1 – Cover Page

Presidential Brokerage, Inc.
5445 DTC Parkway, Suite 1100
Greenwood Village, CO 80111
303-694-1600
www.presidentialbrokerage.com
March 31, 2018

This Form ADV Part 2A Appendix 1 (“Wrap Fee Brochure”) provides information about the qualifications and business practices of Presidential Brokerage, Inc. (“Presidential”). If you have any questions about the contents of this Brochure, please contact us at 800-230-1288 or acampen@presidentialbrokerage.com. 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.

Presidential is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Presidential also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

There are no material changes to this brochure since this brochure was last updated on March 31, 2017.

Delivery:

In the future we will deliver our “Summary of Material Changes” within 120 days of our fiscal year end if there have been material changes since the last annual updating amendment. We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Tony Campen, Chief Compliance Officer, at 800-230-1288 or acampen@presidentialbrokerage.com. Our Brochure is also available on our web site www.presidentialbrokerage.com, also free of charge.

Additional information about Presidential is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with Presidential who are registered, or are required to be registered, as investment adviser representatives of Presidential.

Item 3 -Table of Contents

Item 1	Cover Page.....	1
Item 2	Material Changes.....	2
Item 3	Table of Contents	3
Item 4	Services, Fees and Compensation.....	4
Item 5	Account Requirements and Types of Clients.....	9
Item 6	Portfolio Manager Selection and Evaluation	9
Item 7	Client Information Provided to Portfolio Managers.....	10
Item 8	Client Contact with Portfolio Managers.....	11
Item 9	Additional Information.....	11

Item 4 - Services, Fees and Compensation

Services

Presidential Brokerage, Inc. ("Presidential") has entered into an agreement with Wells Fargo Clearing Services ("WFCS"), pursuant to which WFCS provides the brokerage and custodial services, including trading and execution, with respect to the programs. Clients of the Asset Advisor and Private Investment Management ("PIM") programs described herein are clients of Presidential. Presidential is not related or affiliated with WFCS. Unless otherwise specified, the Clearing Agent will maintain custody of client assets. The Clearing Agent qualifies as a "qualified custodian" as described by Rule 206(4)-2 of the Investment Advisers Act. Presidential and WFCS each reserves the right to reject and not provide services to any client or with respect to any client account for any reason.

Private Investment Management ("PIM")

With PIM, Presidential Financial Advisors (also referred to as "Portfolio Managers") provide investment advisory services to your account on a discretionary basis (meaning investment decisions are made without prior contact with the client). As a minimum criterion for providing advisory services, Presidential requires our Portfolio Managers to possess satisfactory past business experience, plus any required industry examinations and registrations. Based on your investment objectives and individual needs, your Portfolio Manager will have discretion to manage assets to an appropriate investment strategy.

Most types of securities are eligible for purchase in a PIM account including, but not limited to, common and preferred stocks, exchange-traded funds, closed end funds, fee based unit investment trusts, corporate government and municipal bonds, certificates of deposit, options (limited availability), and certain mutual funds whose shares can be purchased at net asset value. Collectively, these are referred to as "Program Assets".

PIM is based on both fundamental and quantitative research and other independent research. Individual PIM Portfolio Managers may develop specific investment strategies using a mix of these analytic methods. Such strategies ordinarily include long and short-term securities purchases and, depending on your objectives and the Portfolio Manager's investment philosophy, may include option strategies such as "covered call writing". In special circumstances, the strategies may also include margin transactions, other option strategies, and trading or short sale transactions. Certain strategies and investment products are not suitable for all investors.

Portfolio Managers may use third party research to assist in developing security selection models for PIM. When seeking to anticipate trends and identify undervalued securities with sound fundamentals, Portfolio Managers may also use a security selection and portfolio modeling process that incorporates fundamental, technical and/or statistical analyses of historical data. Due to any number of factors, including timing of deposits, tax considerations, investment selection process or investment needs, clients may receive different execution prices and investment results.

Asset Advisor

Asset Advisor is a non-discretionary, client directed investment program in which your Financial Advisor may provide a broad range of investment recommendations based on your investment objectives, financial circumstances and risk tolerance. Clients make the ultimate determination to accept or reject these recommendations or select different investments for the account.

Most types of securities are eligible for purchase in an Asset Advisor account including, but not limited to, common and preferred stocks, exchange-traded funds, closed end funds, fee-based unit investment trusts, corporate and government bonds, certificates of deposit, options, structured products, certain mutual funds whose shares can be purchased at net asset value, and certain wrap class alternative investments, such as hedge funds and managed futures funds. Collectively, these are referred to as "Program Assets".

Certain strategies and investment products are not suitable for all investors (i.e. hedge funds are complex investment vehicles that often use leverage and other speculative investment practices, such as short sales, options, derivatives, futures and illiquid investments that may increase the risk of investment loss.)

Certain assets, such as commodity futures contracts, annuities, and limited partnership interests are not eligible as Program Assets, and are referred to collectively as "Excluded Assets". Some Excluded Assets may be purchased or sold in your account. These transactions will incur commissions or charges.

New-issue CDs are an eligible Program Asset. The yield of a new-issue CD takes into account a sales concession in order to compensate the brokerage firms that sell the CDs. For certain advisory accounts, the underwriter retains this sales concession. Although Presidential does not receive the sales concession, it has an impact on the overall yield paid to you. Since we charge an advisory fee on the eligible assets within an advisory account, you are effectively charged both the sales concession (retained by the underwriter) and the advisory fee on the CD. These charges reduce the overall yield on the CD and, in some cases, may result in a negative yield. You should be aware that you could obtain the same CDs without being subject to the advisory fee if you purchase it in a non-advisory brokerage account.

Fees and Compensation

All of the programs described in the brochure are charged a fee on eligible assets that covers advisory, execution, custodial and reporting services. The Fee Schedules for each program are set forth below.

PIM and Asset Advisor accounts are charged an all-inclusive fee that covers advisory, execution, custodial and reporting services. Billed quarterly in advance, the standard PIM and Asset Advisor fee schedule is based on program eligible assets as follows:

<u>Total Account Value</u>	<u>Annualized Fee</u>
First \$250,000	3.00%
Next \$750,000	2.50%
Over \$1,000,000	2.00%

You should be aware that any of the above program fees charged may be higher or lower than those otherwise available if you were to select a separate brokerage service and negotiate commissions in absence of the extra advisory service provided.

Our fee schedules may be negotiated depending on a range of factors including, but not limited to account size and overall range of services provided.

You should consider the value of these advisory services when making such comparisons. The combination of custodial, advisory and brokerage services may not be available separately or may require multiple accounts, documentation and fees. You should also consider the amount of anticipated trading activity when selecting among the programs and assessing the overall cost. Advisory programs typically assume a normal amount of trading activity and, therefore, under particular circumstances, prolonged periods of inactivity or asset allocations with significant fixed income or cash weightings may result in higher fees than if commissions were paid separately for each transaction.

Client should be aware that the fee charged will encompass all money market funds and cash held in the account, even those transferred into client's account for which client may have previously paid sales charges or borne other costs in acquiring these money market fund or fund shares.

A portion of the fees or commissions charged for the programs described here will be paid to Presidential Financial Advisors in connection with the introduction of accounts, as well as for providing client-related services within the programs. This compensation may be more or less than a Financial Advisor would receive if you paid separately for investment advice, brokerage, and other services, and may vary, depending on the program or services offered.

Unless agreed upon otherwise, you authorize us to deduct our quarterly fee from the account, charged in advance of the quarter, calculated at the rate indicated in the Fee Schedule. For the purposes of calculating program fees, "total account value" shall mean the sum of the long and short market value of all securities and mutual funds, if applicable. In valuing the account, we will use the closing prices or, if not available, the lowest published "bid-price" and if none exist, the last reported transaction if occurring within the last 45 days. For mutual funds, we use the fund's most current net asset value, as computed by the fund company. all valuations will be performed by WFCS as the custodian.

The initial fee is calculated as of the date that the account is accepted into the program and covers the remainder of the calendar quarter. This fee shall be paid from the account within 5 business days of acceptance of the Asset Advisor Agreement. Subsequent quarterly fees generally shall be debited within ten business days of each succeeding calendar quarter based on the value of the account on the last business day of the prior calendar quarter.

No fee adjustment will be made during any fee period for appreciation or depreciation in value of the assets in your account during that period. Your account will be charged or refunded a prorated quarterly fee on any net additions or net withdrawals in the account during a month. Fees will be charged or refunded if the net addition or net withdrawal would generate a fee or refund of at least \$40 for that quarter. Fees will be assessed or refunded in the month following the net addition or net withdrawal.

Whenever there are changes to the fee schedule, the schedule charges previously in effect shall continue until the next billing cycle.

Risk in the Use of Margin

To the extent margin is used in your account, you should be aware that the margin debit balance will not reduce the market value of eligible assets, and will therefore increase the asset-based fee you are charged. The increased asset-based fee may provide an incentive for your Financial Advisor to recommend the use of margin strategies. The use of margin is not suitable for all investors, as it increases leverage in your account and therefore risk.

Other Account Fees

The advisory fee does not include certain dealer markups or markdowns (if applicable), odd lot differentials, transfer taxes, exchange fees, execution fees (foreign and/or domestic) when applicable, and any other fees required by law. Cash balances in an Account may be invested in money market mutual funds including, as permitted by law, those with which we have agreements to provide advisory, administrative, distribution, and other services and for which we receive additional compensation for the services rendered beyond the Presidential advisory fee charged to your account. In a low interest rate environment, the yield that you earn on cash and cash alternatives, including cash sweep funds, CDs and money market funds may not offset advisory fees. In some instances, the effective yield of the investment may in fact be negative.

Non-brokerage related fees, such as IRA fees, are not included in the wrap fee and may be charged to your account separately by WFCS as the custodian. As more fully described in the fee schedules, the fees you are charged may be different, depending on the type of asset invested in the account.

Your Financial Advisor may suggest that you use other products and services that Presidential offers, but that are not available through the program you select ("Excluded Assets"). Excluded Assets are not charged a program fee and are not considered a part of the program or program services. We generally recommend that you hold these Excluded Assets in a separate brokerage account. If an excluded fund purchased for or transferred into your account later becomes eligible for the program, program fees will apply to that fund and it may become subject to the rebalance trading system. You will incur any usual and customary brokerage charges and fees imposed on transactions in Excluded Assets which may include (i) any dealer markups and odd lot differentials and transfer taxes; (ii) charges imposed by broker-dealers and custodians other than WFA and its affiliates and fees for other products and services that we and our affiliates may offer; (iii) offering discounts, commissions and related fees in connection with underwritten public offerings of securities; (iv) margin interest and operational fees and charges (i.e. including, but not limited to postage and handling); (v) IRA fees; and (vi) any redemption fees, SEC and exchange fees and/or similar fees imposed in connection with mutual fund transactions whereby Presidential or your Financial Advisor may receive additional compensation on these Excluded Assets.

Cost of Investing in Mutual Funds

In addition to program fees, as a shareholder of a money market, mutual fund or closed-end fund, you will bear a proportionate share of the fund's expenses, including investment management fees that are paid to the fund's investment advisor. Presidential may receive 12b-1 servicing fees from these mutual funds or closed-end funds. For more complete information about these funds, please refer to the relative fund prospectus.

You should be aware that you may invest in Money Market Funds or Mutual Funds directly without incurring the fee charged for participation in a program. In addition, certain institutional investors may directly purchase a class of shares of certain money market funds or funds that do not charge shareholder services, sub-accounting or other related fees.

If you do, however, you will not receive the various program services provided under the advisory program, and some mutual funds may impose a sales load on direct investments. You will receive a prospectus for each money market and mutual fund purchased, as required by securities regulations.

Presidential or our service providers may collect such fees directly or indirectly from some or all of the mutual funds in which you invest, and we may pay any such fees received to Presidential's Financial Advisors. The amount of the fees we or your Financial Advisor receive will vary, depending on the percentage paid pursuant to a fund's Rule 12b-1 plan.

Certain Funds make multiple no-load, institutional, advisory or load-waived share classes available for purchase through investment advisory programs. Specific share classes may be available only through certain Presidential investment advisory programs and may have different shareholder servicing, sub-accounting, investment management and 12b-1 fees and charges from other shares classes offered by those Funds. As a result, some clients may have purchased lower-cost institutional share classes, while others may have purchased a non-institutional share class.

Account Termination

Your account agreements may be terminated by either party at any time upon notice. If you terminate your Agreement, a pro rata refund will be made, less reasonable start-up costs. You have the right, within five (5) days of execution, to terminate the Client Agreement without penalty. In the event of cancellation of Client Agreements, fees previously paid pursuant to the fee schedule will be refunded on a pro rata basis, as of the date notice of such cancellation is received by the non-cancelling party, less reasonable start-up costs.

If you choose to terminate your agreement with any of our investment advisory programs, we can liquidate your account if you instruct us to do so. If so instructed, we will liquidate your account in an orderly and efficient manner. We do not charge for such redemption; however, you should be aware that certain mutual funds impose redemption fees as stated in their fund prospectus. You should also keep in mind that the decision to liquidate security issues or mutual funds may result in tax consequences that should be discussed with your tax advisor.

We will not be responsible for market fluctuations in your account from the time of notice until complete liquidation. All efforts will be made to process the termination in an efficient and timely manner. Factors that may affect the orderly and efficient liquidation of an account might be size and types of issues, liquidity of the markets, and market makers' abilities. Should the necessary securities' markets be unavailable and trading suspended, efforts to trade will be made as soon as possible following their reopening. Due to the administrative processing time needed to terminate an advisory account, termination orders cannot be considered market orders. It may take several business days under normal market conditions to process your request.

If an advisory program account is terminated, but you maintain a brokerage account with us, the money market fund used in a “sweep” arrangement may be changed and/or your shares may be exchanged for shares of another money market fund (as not all of the money market funds used in our advisory accounts are available in brokerage accounts). You will bear a proportionate share of the money market fund’s fees and expenses. You are subject to the customary brokerage charges for any securities positions sold in your account after the termination of program services.

Item 5 - Account Requirements and Types of Clients

Account Requirements

The minimum initial account values for the Programs in this document are listed below. Under certain circumstances, the minimum account size may be waived.

<u>Program Name</u>	<u>Minimum Account Size</u>
Private Investment Management	\$50,000
Asset Advisor	\$25,000

Types of Clients

Presidential provides advisory services to individuals, pension or profit sharing plans, trusts, estates, corporations and other business entities.

Item 6 - Portfolio Manager Selection and Evaluation

Presidential’s Financial Advisor acts as the Portfolio Manager for Asset Advisor and PIM. The decision to invest in these programs and to use our Financial Advisor as the Portfolio Manager for your account is exclusively decided upon by you. When using a Presidential Financial Advisor as the Portfolio Manager, there is a potential conflict of interest in that a larger portion of the advisory fee is paid to the Financial Advisor than when a third-party asset manager is involved in providing advisory services to the account.

Presidential Financial Advisors provide personalized investment management, and in certain circumstances, personal financial planning services may be included. Our Financial Advisor works with you to identify your investment goals to develop a financial plan or investment strategy based on your risk tolerance, time horizon and overall investment objectives. You are allowed to place reasonable restrictions or special requirements on your account (i.e. to limit or exclude investments in specific stocks, leave a certain portion of the account in cash or cash equivalents, etc.) These limitations must be agreed upon by both you and the Financial Advisor and accepted by Presidential.

Performance Based Fees and Side-by-Side Management

Presidential does not offer any investment advisory services where fees are based on capital gains in the account.

Methods of Analysis, Investment Strategies and Risk of Loss

Presidential advisory programs provide access to a wide variety of investment strategies and styles. Individual, customized asset management, asset allocation and model portfolios are available. The specific program that is chosen will determine the types of investments that are used (i.e. stocks, bonds, ETFs, etc.), strategy and style (i.e. value, growth, passive, active, etc.).

A variety of informational resources are used to perform the security analysis, again dependent on the portfolio manager and respective program that is chosen. Presidential Financial Advisors may use fundamental and/or technical methodologies and would potentially subscribe to information providers that focus on those areas (i.e. Dorsey Wright may be used to help analyze a stock or mutual fund from a technical perspective. Alternatively, Morningstar may be used to focus more on the fundamentals of a particular stock or mutual fund.) Presidential has access to a variety of institutional research, such as Standard & Poor's, Credit Suisse, Wells Fargo Securities, Sanford Bernstein and others. Additionally, Financial Advisors may subscribe to specific financial periodicals, as well as review corporate filings made with the SEC.

PIM provides the Portfolio Manager with discretion over the trading decisions in your account, with no obligation to contact you prior to the transaction. Asset Advisor is strictly available on a non-discretionary basis, and the client makes the final determination on investment decisions for the account.

All investments entail risk and the possible loss of money. Some investment strategies may incur higher expenses or carry a greater degree of risk (i.e. tactical allocation, which often incurs frequent trading, foreign trading, high yield bonds, etc.). These increased trading costs and potential tax consequences will impact the final return on the investment. There is no guarantee that the investment strategy selected for the client will result in the client's goals being met, nor is there any guarantee of profit or protection from loss. For those investments sold by prospectus, clients should read the prospectus in full.

Voting Client Securities

Presidential does not vote client securities. Relative to mutual fund holdings, in most cases, the mutual fund manager, will vote your proxies. You can obtain a copy of your mutual fund's proxy voting policies online through the fund company website, or by reviewing fund documents filed with the SEC at www.sec.gov.

Item 7 - Client Information Provided to Portfolio Managers

You must complete an Account Profile with the assistance of your Financial Advisor. The Account Profile outlines your investment objectives, financial circumstances, risk tolerance and any restrictions you may wish to impose on your investment activities. We will contact you, at least annually, to request whether there have been any changes in your financial situation, investment objectives or restrictions. You agree to inform us in writing of any material change in your financial circumstances that might affect the manner in which your assets should be invested. Your Financial Advisor will be reasonably available to you

for consultation on these matters, and will act on any changes deemed to be material or appropriate as soon as practical after we become aware of the change.

Item 8 - Client Contact with Portfolio Managers

Your contact for information and consultation regarding your program accounts is your Financial Advisor.

Item 9 – Additional Information

Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Presidential or the integrity of Presidential's management. Information regarding disciplinary information can be found at <https://brokercheck.finra.org/>.

Other Financial Industry Activities and Affiliations

Presidential is a FINRA registered broker/dealer and a licensed Insurance Agency. All of Presidential's advisory representatives are registered representatives of Presidential and may earn sales commissions when effecting securities transactions for clients in that capacity. Most of Presidential's advisory representatives are also licensed insurance agents that generate commissions through the sale of insurance products. Commissions generated by both the brokerage and the insurance products may involve clients that are also clients of the Presidential in its capacity as an advisor. Also, the firm and its representatives receive compensation from the third party program providers described in Item 4 of the firm's Part 2A disclosure. All of these forms of compensation result in a conflict of interest when these products are offered and sold to clients. When making recommendations of these products and services are made only in the best interest of the client.

Presidential also enters into solicitation arrangements with other advisors or money managers to refer Presidential's clients to outside programs and third party money managers. Prior to referring any client to a third party advisor Presidential verifies that they are properly registered with the appropriate federal and/or state agencies responsible for Investment Advisory licensing and registration including, but not limited to, the California Department of Corporations.

Code of Ethics and Personal Trading

On occasion, an advisory representative will make the purchase and/or sale of securities for their own accounts that are also recommended to its clients. Presidential has a fiduciary duty to its advisory clients and will always give client trades priority over same-day trades executed for Presidential or and/or affiliated persons.

Presidential has adopted a Code of Ethics which states that high ethical standards are essential for the success of Presidential and to maintain the confidence of clients and clients serviced by its advisory representatives. Presidential's long-term business interests are best served by adherence to the principle that the interests of clients come first. Presidential has a duty to act solely for the benefit its clients. Potential

conflicts of interest may arise in connection with the personal trading activities of our personnel. Accordingly, Presidential has adopted this Code of Ethics containing provisions designed to (1) prevent improper personal trading; (2) identify conflicts of interest; and (3) provide a means to address any actual or potential conflict of interest. Adherence to the Code of Ethics and the related restrictions on personal investing is considered a basic condition of employment by Presidential. Clients or potential clients may receive a copy of this Code of Ethics by contacting Presidential at 800-230-1288.

Participation or Interest in Client Transactions

Presidential and our Financial Advisors may from time to time purchase or sell securities that are also held by our clients. This presents no conflict of interest, as the securities are widely held and publicly traded. Client trades are given priority over trades executed for the benefit of Presidential or Presidential Financial Advisors.

Presidential and our Financial Advisors are prohibited from “trading ahead” of client orders (otherwise known as “front running”). We may, however, purchase or sell a security as part of a block, or bunched transaction (i.e. in conjunction with client orders where all investors receive the same average price). Additionally, due to the variety of advisory programs available, and their various styles and objectives, it is possible that one Financial Advisor may be selling a security that another Financial Advisor is buying. Presidential does not believe this presents a conflict of interest, as the securities are generally highly liquid and publicly traded, as well as the fact that trading activities by one advisor are not known by the other and this instance would occur only by coincidence.

Review of Accounts

Presidential periodically reviews the performance of accounts including those it refers to third party money managers. Accounts managed on a discretionary basis by Presidential are reviewed regularly by IARs and on a quarterly basis by the Chief Compliance Officer based on a sample population for each of the models offered. Advisory clients may also contact Presidential with questions at any time.

Third party money managers will supply reports to Presidential and to clients referred by Presidential as described in the disclosure brochures of the respective money managers. Discretionary accounts managed by Presidential will receive statements at least quarterly from the custodians where their accounts are domiciled.

Client Referrals and Other Compensation

Presidential’s advisory representatives also sell securities and insurance products, in their separate capacities as registered representatives and insurance agents, for sales commissions. Some of the advice offered by advisory representatives involve investments in mutual fund products. Load and no-load mutual funds may pay annual distribution charges, sometimes referred to as a 12(b)-1 fee. The advisory representatives may receive a portion of the 12(b)-1 fee from some investment companies in their separate capacities as registered representatives. Clients should be aware that these 12(b)-1 fees come from fund assets, and thus, indirectly from client’s assets. The receipt of these fees could represent an incentive for registered representatives to recommend funds with 12(b)-1 fees or higher 12(b)-1 fees over funds with no fees or lower fees, therefore creating a potential conflict of interest. While the advisory representatives of Presidential endeavor at all times to put the interest of the clients first as part of their fiduciary duty, clients

should be aware that the receipt of additional compensation itself creates a conflict of interest, and may affect the judgment of the advisory representatives when making recommendations.

Presidential may receive, from time to time, compensation in the form of marketing expense reimbursements from various Mutual fund, UIT or Insurance companies or REITs. These reimbursements may be related to Presidential's Advisory business, its activities as an Insurance Agency or as a Broker/Dealer, and are usually a direct result of, and in proportion to, business conducted with the reimbursing company.

Presidential also benefits by recommending the programs and services of FCC and WFA. These firms provide services to Presidential which enhance Presidential's operations and support structure. For example, these firms may provide software, research, reporting capabilities, fee-billing assistance, compliance notices, account access and order entry services which, if not provided, would have to be obtained elsewhere. Because such services are provided for little or no cost, a conflict of interest exists when Presidential recommends these firms to clients for custody and brokerage services.

Solicitation Arrangements - Presidential may enter into agreements with Solicitors (Referring Parties) to refer clients to Presidential. If a referred client enters into an investment advisory agreement with Presidential, a cash referral fee may be paid to the referring party, which is based upon a percentage of the client advisory fees that are generated. Presidential will only enter into such arrangements with individuals properly registered as solicitors and follow CCR 260.236(c)(2) requirements. Presidential also enters into solicitation arrangements with other advisors or money managers to refer Presidential's clients to outside programs. Under these circumstances Presidential and/or its advisor representatives may be paid a cash referral fee, which is based upon a percentage of the client advisory fees that are generated. In either circumstance the referral agreements between any referring party and Presidential, and vice versa, will not result in any charges to clients in addition to the normal level of advisory fees charged. However, a conflict occurs any time the fees paid to the referrer are greater than fees derived by referring the client to another advisor. Presidential's Relationship With FCC - Presidential utilizes FCC for clearing and custodial services. As a result, Presidential may receive income from FCC as it relates to these clearing and custodial services.

Financial Information - Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Presidential's financial condition. While Presidential retains discretionary authority over some client's investment advisory accounts, it 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. Additionally, Presidential does not solicit the prepayment of more than \$500 in fees per client, more than six months or more in advance.