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**FORM ADV PART 2A
BROCHURE**

March 29, 2019

This brochure provides information about the qualifications and business practices of Deighan Wealth Advisors. If you have questions about the content of this brochure, please contact us at 207.990.1117 or info@deighan.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about Deighan Wealth Advisors is also available at the SEC's website at www.adviserinfo.sec.gov.

Deighan Wealth Advisors 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.

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MATERIAL CHANGES

In this section, we discuss only material changes since the last annual update of our firm brochure.

Firm Ownership:

On February 15, 2019 as part of a planned business succession, Jean Deighan sold Deighan Wealth Advisors to Lucie Estabrook, Jenifer Butler, and Jennifer Eastman. Jean continues as a Senior Advisor with the firm and its clients. Lucie Estabrook assumes the title of Chief Executive Officer. Jenifer Butler maintains the title of Chief Investment Officer. Jennifer Eastman assumes the title of Chief Operations Officer.

Elimination of Minimum Account Size:

The firm has eliminated the \$500,000 minimum account size.

ADVISORY BUSINESS

Founded in 1994 by Jean M. Deighan and Jenifer L. Butler, Deighan Wealth Advisors (DWA) offers investment management services by designing and maintaining portfolios of individual stocks and/or stock mutual funds and exchange traded funds (ETFs), and bonds and/or bond mutual funds and ETFs for its clients. Portfolios are carefully tailored to reflect each client's investment objectives taking into consideration financial goals, time horizon and risk tolerance as well as any other investment restrictions imposed by the client. The firm also provides Financial Planning consulting services making customized recommendations based solely on our clients' best interests. Occasionally, the firm will offer investment advice to persons or entities that require assistance making appropriate investment choices in salary deferral, company retirement plans, or other assets not managed by DWA. Jenifer Butler, Jennifer Eastman, and Lucie Estabrook are the firm's principals and shareholders.

**Assets Under Management (AUM)
As of February 28, 2019**

Discretionary AUM: \$163,638,641
Non-discretionary AUM: \$4,072,084

Total Asset Under Management: \$167,710,725

FEES AND COMPENSATION

Fees for **Investment Management Services** are as follows:

- 1.25% of assets on the first \$100,000 under management;
- 1.00% on the next \$400,000;
- 0.90% on the next \$500,000;
- 0.75% on the next \$2,000,000;
- 0.50% of assets in excess of above.

Method of calculation

The above fees are calculated and prorated monthly based on the account market value on the last trading day of the month and paid in arrears. Generally, fees are deducted from clients' assets and clients receive notification. However, clients may receive monthly invoices upon request. No fees are pre-payable. The client will be charged only the prorated fee to the date of termination. We are a fee-only firm. Under no circumstances will DWA or any employee of the firm accept commissions, or transaction-based revenues from loads, sales charges, or mark-ups in client accounts.

Financial Planning and Consulting fees are as follows.

Initial Financial Plan: \$2000. Includes two client meetings, review of client financial information, data entry, research as required, and the production and delivery of a written financial plan with recommendations.

Additional financial planning meetings: \$1000. In certain cases, the level of complexity and unique circumstances require additional research, data gathering, written follow up, and additional client meetings with an Advisor.

Annual financial plan review and update: \$500.

Specialized Consulting Services: \$200 per hour for Advisory services. \$100 per hour for Paraplanner services. Services include cost basis analysis, education planning, estate planning, and in limited cases portfolio consulting.

The Client is responsible for all actual "out of pocket" expenses incurred by the Advisor including overnight mailing costs. Should the client wish to retain the Advisor for discretionary investment management services, such engagement will be pursuant to a separate contract.

Financial planning fees may be discounted for clients who have retained DWA for portfolio management services.

The management of self-directed retirement plans varies with the types of plans; thus, management fees are generally negotiated.

Brokerage and other transaction costs are discussed in the section entitled ***Investment Brokerage and Discretion***. It is important to note that all mutual funds and exchange-traded funds (ETFs) will charge a management fee at the fund level. Further, when we trade certain mutual funds, the securities custodian may charge a transaction fee.

It is expected that the firm will derive approximately 95% of its revenues from providing "investment supervisory services" to its clients. "Investment supervisory services" is defined as the giving of "continuous investment advice to a client (or making investment decisions for the client) based on the individual needs of the client." It is expected that the firm will generate approximately 5% of its revenue from the furnishing of investment and/or investment related advice through consulting arrangements. The fee for consulting services is \$200 per hour when the firm is not managing investment assets. From time to time, the firm may provide, within the context of the overall relationship with the client, advice concerning estate planning and matters not involving securities, however, no additional revenues are generated from these activities.

Performance-Based Fees and Side-by-Side Management

DWA does not accept performance-based fees.

TYPES OF CLIENTS

The firm generally provides investment advisory and financial planning services to individuals, corporations, trusts, estates, charitable organizations, and profit-sharing plans.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

The firm utilizes fundamental analysis in the selection of securities, placing great emphasis on measures of intrinsic value, earnings growth, and strong financial statements. The firm receives information used in the analysis and selection of securities from a variety of sources such as: purchased research, corporate filings with the Securities and Exchange Commission, quarterly and annual reports, prospectuses, company press releases, corporate rating services, financial newspapers and magazines, and research materials provided by brokerage and other investment advisory firms.

Strategies are designed to meet client requirements, including risk tolerance and time horizon. The specific investment strategies used to implement the firm's investment advice vary greatly from long-term purchases to trading. "Trading" is generally defined as selling a security within 30 days of its purchase. Frequent trading can affect performance, particularly through increased brokerage and other transaction costs and taxes. In most cases, we recommend holding securities until company fundamentals change (such as narrowing margins or negative industry expectations). Option strategies are, from time to time, recommended to address structural issues in a portfolio such as protecting large, low cost basis holdings from market volatility. Portfolios are diversified, and it is generally true that any one security will not account for more than 10% of the total portfolio value unless so directed by the client. Some portfolios may violate this rule due to specific client objectives, tax considerations, or investments in diversified exchange-traded funds (ETFs) or mutual funds. Margin investing is not recommended but may be employed for short-term borrowing needs.

Types of Investments

The firm utilizes individual equities, mutual funds, ETFs, warrants, corporate debt obligations, commercial paper, certificates of deposits, municipal securities, investment company securities (with the exception of variable life insurance), U.S. Government and U.S. Government-sponsored entity securities, and options. While DWA does not typically invest in initial public offerings (IPOs), futures contracts, hedge funds, private equity funds, closely held or non-publicly traded securities, the firm does utilize mutual funds and ETFs that may contain some of these types of investments.

Risk of Loss

There is material risk involved in any investment strategy. Some of the risks include the following: the risk that the general level of asset prices will decline; the financial condition of the issuers of individual securities may decline; various and unpredictable factors such as inflation, interest rates, economic expansion or contraction, global, regional, economic, political or banking crises; lack of liquidity or active trading or other market disruptions; clearing and settlement of transactions may be delayed or disrupted; fees and commissions for trading may change without notice.

Individual stocks or bonds generally have more company specific risk than investments in a pool of securities such as an ETF or mutual fund. Securities invested in a narrow asset category such as gold or a single country or economic sector generally have more risk individually than a combination of investments in a more diversified portfolio. DWA tries to mitigate the volatility of all the above risk factors by diversifying investments among issuers and by asset class, but positive performance is not guaranteed, and past performance is not indicative of future results.

DISCIPLINARY INFORMATION

Neither Deighan Wealth Advisors nor any of its employees has been involved in any legal or disciplinary actions that involved investments or financial wrongdoing.

Neither Deighan Wealth Advisors nor any of its employees has been involved in any administrative proceedings that involved a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority.

Neither Deighan Wealth Advisors nor any of its employees has been involved in a proceeding of a self-regulatory organization (SRO) that caused an investment related business to lose its authorization to do business or violated the SRO's rules.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Deighan Wealth Advisors is not involved in other financial industry activities or affiliations that are material to its business.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS OR PERSONAL TRADING

Code of Ethics

Honesty and integrity are the cornerstones upon which DWA has built its business, and the firm has had a Code of Ethics in place since its 1994 inception. The Code sets forth standards of conduct that apply to all employees of the firm including strict compliance with the law and zealous maintenance of our fiduciary duty to clients. In its effort to maintain the highest possible standards, DWA committed to maintaining practices that are consistent with the principles and provisions set forth in the *Code of Ethics and Standards of Professional Conduct* of the CFA Institute upon establishment of the firm in 1994. In 2006, DWA made the same commitment with regard to the CFA Institute's *Asset Manager Code of Professional Conduct*, which outlines the ethical and professional responsibilities of firms that manage assets on behalf of both institutional and retail clients. Both Codes and their amendments are incorporated as the foundation of our firm Code. Upon being hired as an employee of the firm, and annually thereafter, each employee must sign a memo agreeing that s/he has read and understands the Codes. We are happy to provide a copy of our Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

The firm and its personnel may maintain private investment accounts for their own benefit and the benefit of relatives and, as might be expected, these accounts frequently invest in the same securities DWA purchases for its clients. Since the firm's principal fiduciary obligation is to its clients, the firm's *Code of Ethics* provides that when the firm is contemplating the purchase or sale of a security for its clients, no similar action with respect to that security may be taken for the firm's account or any employee's account until the contemplated action is first taken for clients or is taken in conjunction with clients. The Code further states that no individual may use any information acquired in the course of his/her employment in any fashion that is detrimental to clients' interests, or disclose information concerning any client's account unless such disclosure is authorized by the client or required by law. DWA handles all related accounts (for example: accounts held for the benefit of relatives) in the same fashion as non-related accounts with the same objective. This includes non-advisory related accounts. Individual trades are placed and allocated for client accounts first or simultaneously with employee-related accounts. Large block transactions are occasionally submitted simultaneously for employee-related accounts and client accounts, but employee-related accounts do not receive preferential or priority treatment. Reports detailing employee securities transactions are generated quarterly, reviewed by the Chief Compliance Officer or their appointee as appropriate, and kept on file.

BROKERAGE PRACTICES

Research and Other Soft Dollar Benefits

DWA may recommend/require that clients establish brokerage accounts with the Schwab Institutional[®] division of Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although DWA may recommend/require that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. DWA is independently owned and operated and not affiliated with Schwab.

Schwab provides DWA with access to institutional trading and custody services, which are typically not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's client assets are maintained in accounts at Schwab Institutional. Services received from Schwab are not otherwise contingent upon DWA committing to Schwab any specific amount of business (assets in custody or trading). Schwab's services include brokerage, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For DWA client accounts maintained in Schwab's custody, Schwab generally does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Schwab or that settle into Schwab accounts. DWA does not receive transaction-related income from Schwab or any other source.

Schwab also makes available to DWA other products and services that benefit DWA but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of DWA's accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist DWA in managing and administering clients' accounts include software and other technology that (i) provide access to client account data such as trade confirmations and account statements; (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of DWA's fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab Institutional also offers other services intended to help DWA manage and further develop its business enterprise. These services may include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to DWA. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to DWA. Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of DWA personnel.

As a fiduciary, DWA always endeavors to act in its clients' best interests. In evaluating whether to recommend or require that clients custody their assets at Schwab, DWA may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which has a potential to create a conflict of interest. Nevertheless, it is our practice to place the clients' interest ahead of the firm's interest. It is our belief that all will benefit thereby.

Investment Brokerage and Discretion

Unless the client designates the securities broker(s) to be used for their investment account, the firm may place orders for the execution of transactions with or through such brokers, dealers, or banks as the firm may select. In compliance with Section 28(E) of the Securities and Exchange Act of 1934, as amended, such transactions may incur a commission which may be greater than the amount of commission another broker may have charged. The firm uses its best efforts to obtain accurate and prompt execution of securities transactions on the most favorable terms reasonably obtainable, and in so doing considers a number of factors including:

- the net economic result to the account;
- commission rates, which, absent instructions to the contrary from clients, DWA will attempt to negotiate within the generally prevailing competitive ranges, but which may not always be the lowest available at any given time;
- the apparent financial strength, stability, and competence of the brokerage firms under consideration;
- the efficiency with which it may be expected that the transactions will be affected;
- the inherent ability of the brokerage firms under consideration to effect the transaction in cases involving a large amount of the security in question, and
- availability and willingness of those brokerage firms to stand ready to execute difficult transactions in the future.

After being satisfied with respect to the foregoing factors, DWA may also consider other matters involved in the receipt of "brokerage and research services" as defined in, and in compliance with the Securities Act Amendments of 1975. Cases in which the firm will direct commissions to a broker include services such as: research the broker provides, access to the brokerage firm's securities analysts, and access to a brokerage firm's expertise or market making ability in a particular security. The products or services the firm receives from the brokerage community include: company and industry research

reports, economic analyses, analyst commentary, newsletters, and access to securities analysts. The research received is used to benefit all clients.

The firm's authority to select securities brokerage firms and to determine commission rates may be limited by the client's instructions, preferences, and individual arrangements. Such limitations could occur, for example, if a client were referred to the firm by a securities broker and then designated that broker as the one through which transactions should be placed for the client's account but made no definite arrangement with the broker with respect to commissions. In such a case, the broker might not feel compelled to negotiate commission rates with the firm.

SECURITIES LITIGATION CLAIMS FILING SERVICE

DWA utilizes the services of Chicago Clearing Corporation (CCC) to provide class action litigation monitoring and securities claim filing. CCC collects applicable documentation, interprets the terms of each settlement, files the appropriate claim forms on behalf of clients, monitors claims, interacts with the administrators, and distributes claim awards directly to DWA clients enrolled in the service. CCC charges a contingency fee of 15%, which is subtracted from the award when the award is paid. The net proceeds are then sent directly to the client. Unless a client chooses to opt out of this service, they are automatically enrolled as part of the account opening process, and DWA provides their Schwab account transaction information to CCC to assist with the class action suit research. If a client prefers to file their own securities litigation claim forms, they must opt out of the service by signing the CCC opt out form. If clients do not participate in this service, they are responsible for pursuing their own claims.

REVIEW OF ACCOUNTS

Review of Accounts

Accounts are individually reviewed on a regular, but no less than semi-annual basis. These reviews include an examination of each portfolio including its asset allocation, security holdings, cash level, diversification, and income generation. Additional reviews are event driven and summary in nature. These reviews frequently occur when a security has been designated as a "buy" for certain types of client accounts or when a security is considered for sale on a firm wide basis. Other reviews are triggered by asset allocation, cash level, and capital gain and loss checks. Jenifer L. Butler, Chief Investment Officer, Lucie E. Estabrook, Chief Executive Officer, and Tyler D. Hoxie, Associate Analyst/Portfolio Administrator, review all accounts. The reviews are conducted to ensure that each account is managed in a manner that is consistent with the client's objectives. Jenifer L. Butler, Lucie E. Estabrook, and Tyler D. Hoxie manage all portfolios.

Reporting to Clients

Clients receive a quarterly portfolio report showing cost of securities and current market values, a quarterly investment newsletter, and if requested, an annual report containing information useful in client income tax report preparation. Additional reports are available to clients upon request.

CLIENT REFERRALS AND OTHER COMPENSATION

DWA is a fee-only investment management and financial planning firm. None of our employees may charge or accept referral fees, commissions, or transaction-based revenues from loads, sales charges, or mark-ups.

CUSTODY

Under government regulations, we are deemed to have custody of client assets if, for example, we are authorized to instruct the Custodian to deduct our advisory fees directly from client accounts or if the client grants us authority to transfer assets to a third party on their behalf. Charles Schwab & Co. (or another custodian) maintains actual custody of DWA's client assets. Clients will receive account statements directly from Schwab (or another custodian) at least quarterly. Statements will be sent to the email or postal mailing address the client provided to the custodian. Clients should carefully review those statements promptly when they receive them. We also urge clients to compare custodial account statements with the periodic portfolio reports they receive from us. Deighan Wealth Advisors is independently owned and operated and not affiliated with Schwab.

INVESTMENT DISCRETION

The firm primarily accepts accounts for which it has discretionary authority regarding the purchase and sale of securities, and the amounts in which they are bought and sold. Clients must sign an *Agreement to Provide Investment Management Services* before DWA may assume this authority. In limited instances the firm may agree to a non-discretionary account for sophisticated investors. In those cases, client consent must be obtained and documented by the investment advisor before securities can be bought or sold.

VOTING CLIENT SECURITIES

DWA's proxy voting guidelines and procedures are summarized in *Appendix B*. At least one member of our Investment Committee is responsible for reviewing and voting all client proxies for which we have been granted authority to do so, and for monitoring our proxy voting policies and procedures. These policies and procedures are reviewed on an as-needed basis (at least annually) by the Investment Committee and updated accordingly.

DWA's *Proxy Voting Guidelines* do not cover all types of resolutions proposed each year. Because we have a fiduciary duty to clients to examine each resolution proposed and the context in which it applies, we only vote proxies after considering our clients' financial interests and social objectives. For that reason, there may be instances in which client shares may not be voted in strict adherence to our *Proxy Voting Guidelines*. The guidelines are subject to change without notice. A copy of our *Proxy Voting Policy* is available to clients upon request. Proxy voting records are also available upon request to clients at the end of each proxy season.

In all instances where client shares are pooled together for the purpose of voting one block under one master account, DWA reserves the right to vote in favor of the recommendations put forth by the Board of Directors. Unless specifically instructed otherwise, in all instances where an individual client's shares are being voted in isolation, DWA reserves the right to vote in favor of the recommendations put forth by the Board of Directors.

FINANCIAL INFORMATION

As DWA does not accept prepayment of investment management fees, it is not required to provide a balance sheet or obtain qualification of an independent public accountant. However, DWA is not subject to any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

Thank you for your interest. We hope that you find this document informative. If you have questions or comments, please do not hesitate to contact us at 207.990.1117 or info@deighan.com.

FORM ADV PART 2B: BROCHURE SUPPLEMENT

This brochure supplement provides information about Deighan Wealth Advisors' portfolio managers that supplements the firm's brochure. You should have received a copy of that brochure. Please contact Jenifer L. Butler, President, if you did not receive a copy of the brochure (Form ADV Part 2A: Brochure), or if you have questions about the content of this supplement.

Additional information about each of Deighan Wealth Advisors' portfolio managers is available on the United States Securities and Exchange Commission (SEC) website at www.adviserinfo.sec.gov.

ADVISOR EDUCATIONAL BACKGROUND
AND BUSINESS EXPERIENCE

Jenifer L. Butler (1964), CFA, CFP®, Chief Investment Officer, Principal

Education: Ms. Butler received her Bachelor of Science from the University of Maine at Machias in 1987. She is a holder of the Chartered Financial Analyst designation. To earn the CFA charter, candidates must sequentially pass three six-hour examinations that are widely considered the most rigorous in the investment profession. The examinations cover Ethical and Professional Standards, Securities Analysis and Valuation, Financial Statement Analysis, Quantitative Methods, Economics, Corporate Finance, Portfolio Management and Performance Measurement. Ms. Butler is also a Certified Financial Planner™ Certificant.

Business Background: Jenifer is a co-founder and shareholder of Deighan Wealth Advisors. Her day-to-day activities include working with clients, co-managing the firm's strategic initiatives with Jean Deighan, managing compliance activities, and directing the investment process. She serves as Chair of our Investment Review Committee.

From 1989 to 1994, Ms. Butler was employed by F.L. Putnam Investment Management Company. She is a member of the CFA Institute, CFA Society Maine, and the Financial Planning Association. She is Chief Investment Officer and the Chief Compliance Officer for the firm and serves on our Marketing Committee and our Executive Team. Ms. Butler serves on the boards and investment committees of several charitable organizations. She is a Past President, and current member of the Bangor Rotary Club. Her community service has been recognized by her twice being named a Paul Harris Fellow of The Rotary Foundation of Rotary International.

Jean M. Deighan (1951), JD, CFP®, Senior Advisor

Education: Ms. Deighan received her Bachelor of Arts from Tufts University in 1973 and her Juris Doctor from the University of Maine School Of Law in 1976. She graduated from the American Bankers Association Trust Management School in 1982 and the National Graduate Trust School in 1983 where she received the Certified Financial Services Counselor designation. Ms. Deighan is a Certified Financial Planner™ Certificant. CFP® certificants must pass the comprehensive CFP® Certification Examination, the CFP Board's *Fitness Standards for Candidates and Registrants*, agree to abide by its *Code of Ethics and Professional Responsibility and Rules of Conduct* which put clients' interests first and comply with the *Financial Planning Practice Standards* which spell out what clients should be able to reasonably expect from the financial planning engagement.

Jean M. Deighan (1951), JD, CFP®, Senior Advisor (continued)

Business Background: Jean co-founded Deighan Wealth Advisors with Jenifer Butler in 1994. Her day-to-day activities include working with clients and contributing to the firm's strategic vision. She is a member of our Investment Committee, Marketing Committee, and Executive Team.

From 1987 to 1994, Ms. Deighan served as Vice President of F.L. Putnam Investment Management Company. Ms. Deighan was Vice President and Senior Trust Officer of Norstar Bank of Maine's Trust Division where she began her employment in 1978. She is a member of the Maine Bar, and the Financial Planning Association. She serves on the Board of Directors of MMG Insurance Group, and the boards and investment committees of several charitable organizations. She is a Past President and current member the Bangor Rotary Club. Ms. Deighan's community service has been recognized by her being named a Paul Harris Fellow of The Rotary Foundation of Rotary International. She has received the Greater Bangor Chamber of Commerce Athena Award, the City of Bangor Paul Bunyan Citizenship Award, the Maine Business School Achievement in Business Award, the University of New England Deborah Morton Award for Professional and Community Service, and the Greater Bangor Chamber of Commerce's most prestigious honor, the Norbert X. Dowd award.

Jennifer L. Eastman (1974), JD, Chief Operating Officer, Principal

Jennifer joined Deighan Wealth Advisors in 2019. She is a graduate of Arizona State University and the College of William & Mary Law School. She has been recognized as a Best Lawyer in America 2016-2019 in the practice of Elder Law. She has worked with families in planning for retirement, business succession, long term care, and wealth transfer. Jennifer is currently enrolled in the Certified Financial Planner™ program to enhance her experience in investment, retirement, tax and estate planning advisement. Jennifer has practiced in estate planning and elder law for more than 15 years and serves on the boards of several nonprofit organizations. Jennifer is a member of our Investment Committee and is Chair of our Marketing Committee.

Jennifer's day-to-day activities include working with clients, managing the firm's operations, contributing to the firm's investment process, and managing the firm's marketing activities.

Lucie E. Estabrook (1962), CTFA, Chief Executive Officer, Principal

Education: Ms. Estabrook graduated from the National Academy for Paralegal Studies in 1992. She completed the American Bankers Association Graduate Trust School in 2011 and received the Certified Trust and Financial Advisor (CTFA) designation in 2012. The CTFA certification is the undisputed professional credential for financial services professionals whose primary function and expertise focus on the provision of fiduciary services related to trusts, estates, guardianships and individual asset management accounts. The designation signifies that an individual working in this field has attained comprehensive training in the following professional knowledge areas: Fiduciary & Trust Activities, Financial Planning, Tax Law & Planning, Investment Management, and Ethics. Ms. Estabrook anticipates receiving her Bachelor of Science in Accounting from Husson University in 2019.

Business Background: Ms. Estabrook joined DWA in 2010 as Operations Manager. She was soon promoted to Chief Operations Officer and client Advisor. She assumed her current position of Chief Executive Officer in 2019 when she, Jenifer Butler and Jennifer Eastman acquired the firm from Jean Deighan. Lucie's day-to-day activities include managing the firm's strategic initiatives, working with clients, and contributing to the firm's investment process.

Prior to joining DWA, Ms. Estabrook worked as a Wealth Management Officer and Vice President at People's United Bank where she assumed primary responsibility for the administrative oversight of over 250 accounts representing approximately \$132 million in assets under management. Prior to her

Lucie E. Estabrook (1962), CTFA, Chief Executive Officer, Principal (continued)

experience at the bank, she spent more than a decade as a Paralegal with Eaton Peabody, a Bangor, Maine law firm, where she was responsible for administration and distribution of estates. She serves on the Board of Directors and Development Committee of the Bangor Symphony Orchestra, and on the investment committees of local charitable organizations. She is a member of Bangor Area Rotary Club.

Tyler D. Hoxie (1992), Portfolio Administrator and Associate Analyst

Education: Mr. Hoxie is a graduate of the University of Maine where he received his Bachelor of Science Degree in Business Administration with concentration in Finance and a Political Science minor. While in school, Tyler was appointed and sponsored by Senator Olympia Snowe to represent Maine at the U.S. Senate Page School in Washington, DC.

Business Background: Tyler joined Deighan Wealth Advisors in May of 2014. His day-to-day activities include account administration, operations, advisor support, contributing to the firm's investment process, and managing client portfolios. Tyler's responsibilities include securities research, and portfolio management and administration. He is a member of our Investment Committee.

Tyler was awarded the Investment Foundations Certificate in November 2014 from the CFA Institute. Successful completion of the program requires approximately 100 hours of self-study and passing an examination covering the essentials of finance, ethics, and investment roles, providing a clear understanding of the global investment industry. He is currently a Level III Candidate toward the Chartered Financial Analyst designation after successful completion of Levels I and II of the three-level CFA examination. Tyler is active in the Bangor Area Breakfast Rotary Club and looks forward to additional opportunities to share his knowledge and skills.

DISCIPLINARY INFORMATION

None of Deighan Wealth Advisors' employees or advisors has been the subject of legal or disciplinary action.

OTHER BUSINESS ACTIVITIES

None of Deighan Wealth Advisors' employees or advisors is engaged in any outside investment-related business or occupation.

ADDITIONAL COMPENSATION

None of Deighan Wealth Advisors' employees or advisors receives additional compensation in the form of sales awards or prizes for providing referrals or investment advisory services.

SUPERVISION

Advice provided to clients is documented in each client's electronic file and maintained for the period required under the *Books and Records* rule of the Investment Advisers Act of 1940. All client account activity is supervised by the Chief Compliance Officer, Jenifer L. Butler. Jenifer Butler's client account activity is supervised by the Chief Executive Officer, Lucie E. Estabrook. Jenifer and Lucie may be reached at Deighan Wealth Advisors, 455 Harlow Street, Bangor, Maine 04401. Telephone: 207.990.1117 or info@deighan.com.

APPENDIX A: PRIVACY POLICY

Deighan Wealth Advisors' **Privacy Policy** applies to all clients and prospective clients who have contacted the firm. Throughout the policy, we refer to information that personally identifies you or your accounts as "personal information."

We collect personal information in the normal course of business in order to administer your accounts and serve you better. We use your personal information to help us deliver the best possible service to you, and to fulfill our regulatory obligations as required by law.

We do not sell your personal information to anyone.

We do not disclose personal information to third parties with the following exceptions:

- We may disclose personal information to companies including, but not necessarily limited to, your account custodian, that help us establish, process, or service your account(s). We have written agreements with these companies that prohibit them from using your personal information for their own purposes.
- We may disclose personal information to other professionals whom you have retained to help you in the preparation of your taxes, the preparation of legal documents, or the management of other aspects of your financial affairs if you have specifically asked us to do so.
- We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required or permitted under law. For example, to cooperate with regulators or law enforcement authorities, resolve consumer disputes, perform credit/authentication checks, or for institutional risk control.

Outside of these exceptions, we will not share your personal information with third parties unless you have specifically asked us to do so.

We protect the confidentiality and security of your personal information.

- We restrict access to personal information to our employees and agents for business purposes only. All employees are trained and required to safeguard such information. All employees have signed a written confidentiality agreement.
- We maintain physical, electronic, and procedural safeguards to protect your personal information.

We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date. If you identify any inaccuracy in your personal information, or if you need to make a change to your information, please contact us so that we may promptly update our records.

We will provide notice of changes in our information-sharing practices. If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so that you will have the opportunity to opt-out of such disclosure. If you have any questions or concerns, please contact us by e-mail at info@deighan.com, call us at 800-990-1117, or write to Deighan Wealth Advisors, Inc., 455 Harlow Street, Bangor, Maine 04401.

E-mail Communications

E-mail is a convenient form of communication. However, it should not be considered a completely secure form of communication nor should it be considered private. If clients wish to communicate with us by e-mail, they must adhere to the following security measures:

- Never disclose sensitive personal information such as account number, tax identification number, or Social Security number.
- DWA will not request or disclose your personal account information in a non-secure or unsolicited e-mail communication.
- If you receive an e-mail warning you that an account of yours will be closed unless you reconfirm account information, do not respond or click on any link contained in the e-mail. Instead, contact us directly at 800-990-1117.
- Contact us directly at 800-990-1117 for time sensitive requests such as securities transfers or transactions, or cash withdrawals or transfers.

E-mail is useful for establishing meeting dates and discussing general matters regarding account activity. However, we strongly suggest that sensitive account matters be handled by telephone or letter.

APPENDIX B: PROXY VOTING GUIDELINES

A proxy is a document that provides shareholders with information about issues that will be discussed and voted upon at a stockholders' meeting. Shareholders may attend the meeting and register their votes in person, send their "proxy" ballots by mail, or register to receive and vote ballots on-line. If you own individual shares of stocks, you have probably been asked to vote proxies and are familiar with the ballots. Most corporate annual meetings take place between April and June of each year. This busy time period is known as "proxy season."

Our Investment Review Committee is responsible for reviewing and voting all client proxies for which we have been granted authority to do so, and for monitoring our proxy voting policies and procedures. These policies and procedures are reviewed on an as-needed basis (at least annually) by the Investment Review Committee and updated accordingly.

In all instances where client shares are pooled together for the purposes of voting one block under one master account, Deighan Wealth Advisors reserves the right to vote in favor of the recommendations put forth by the board of directors. Unless specifically instructed otherwise, in all instances where an individual client's shares are being voted in isolation, Deighan Wealth Advisors reserves the right to vote in favor of the recommendations put forth by the board of directors.

