

**Firm Brochure  
(Part 2A of Form ADV)**

**CRD 106918**

**DOMINION PORTFOLIO MANAGEMENT, INC.**

**9000 HIGHWAY 2147 WEST, SUITE 201**

**HORSESHOE BAY, TEXAS 78657**

**210-265-8050**

**210-764-5353 (FAX)**

This brochure provides information about Dominion Portfolio Management, Inc. Registration as a Registered Investment Advisor does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at: 210-265-8050, or by email at: shirley.dpm@domiinvestors.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.

Additional information about Dominion Portfolio Management, Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

02-25-2020

## Material Changes (Item 2)

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### Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur.

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### Material Changes Since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

Dominion Portfolio Management became a SEC registered investment advisor on May 13, 2019. All amendments to the Firm Brochure are prepared in accordance with the SEC's rules and requirements.

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### Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 210-265-8050, 800-929-5667 or by email at: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)

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#### Firm Description

Dominion Portfolio Management, Inc. ("hereinafter called DPM") was founded in 1995 and is a SEC registered investment adviser with its principal place of business located in Texas. DPM engages in fee based portfolio asset management on behalf of its clients.

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#### Principal Owner

DPM is a wholly owned subsidiary of Dominion Financial Services, Inc. ("hereinafter called DFS").

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#### Type of Advisory Services

DPM provides portfolio management services predominately on a discretionary basis, either directly through a DPM Investment Advisor Representative (hereinafter called IAR's") or through DPM approved third party money managers.

For customers preferring a more consultative process, DPM offers a non-discretionary portfolio management service which requires discussion with and approval by the customer prior to portfolio changes.

#### Third Party Money Managers

Morningstar Investment Services, Inc. CRD 112525, a SEC registered firm, located at 22 West Washington Street, Chicago, Illinois 60602.

Investment Management Associates, Inc. CRD 110900, a state registered firm, located at 5690 DTC Boulevard, Suite 140W, Greenwood Village, Colorado 80111.

SEI Investments Management Corporation CRD 105146, a SEC registered firm, located at One Freedom Valley Drive, Oaks, and Pennsylvania 19456.

Aris Wealth Services, Inc. CRD 109018, a division of AssetMark, Inc., a SEC registered firm, located at 1655 Grant Street, 10th Floor, Concord, California 94520.

CLS Investments, LLC CRD 107975, a SEC registered firm, located at 17605 Wright Street, Omaha, Nebraska 68130.

Envestnet Asset Management, Inc. CRD 111694, a SEC registered firm, located at 35 East Wacker, Suite 2400, Chicago, Illinois 60601. Hilltop Securities ("hereinafter called HTS") offers a wrap fee program Premier Advisors through Envestnet. DPM does not participate or offer this wrap fee program.

Maple Capital Management, Inc., CRD 130209, a SEC registered firm, located at 535 Stone Cutters Way, Montpelier, VT 05602

Third party money manager fees are disclosed in their advisory agreement and ADV Part 2.

Morningstar and Investment Management Associates, Inc. have clearing and custody arrangements through TD Ameritrade, a member of FINRA, SIPC and NFA. TD Ameritrade

provides standard industry services to its brokerage clients. DPM has service agreements with these managers and TD Ameritrade. DPM does not add additional fees to that of the third party money managers' program. The third party money manager compensates DPM with a portion of its fee.

### DPM Managed Accounts

DPM recommends that its clients open their accounts at DPM's related broker/dealer, Dominion Investor Services, (hereinafter called "Dominion") for accounts it manages.

Generally, DPM will use Class F-2 or equivalent shares of mutual funds for a Client. If the account will be held directly at the mutual fund group then DPM will follow the policies of the fund group and also their minimum account size. In the event there may be an advantage to the client when using 12b1 paying fund classes, the 12b1 fees will be used to offset DPM fees.

All accounts that are managed on a discretionary basis will have security transactions placed on their behalf when deemed necessary and prudent or by specific client request. To determine the individual needs of a client, each non-institutional client will be required to complete a confidential investor profile containing a variety of personal and financial information. Requested information includes investment goals, time horizons and risk tolerance. DPM may require the client to complete additional investor profiles should client experience significant change in their financial condition or familial obligations.

Through an analysis of this data, DPM develops a portfolio for each client. All portfolios are client specific. A DPM IAR will consult with the client on the overall investment strategy to be implemented. The client will have the opportunity to place reasonable restrictions on the management of their portfolio, such as limiting individual securities, asset allocation weightings, industries, etc. Any restrictions will be detailed in the advisory contract. DPM will then implement, on behalf of each client, the chosen investment strategy through the purchase of a number of stocks, bonds, ETF's or mutual funds (no-load or load waived) that are deemed to be appropriate risk adjusted choices for the client. DPM will then monitor each client's portfolio and when deemed appropriate for the client will make changes in specific security selections. DPM may alter asset allocations as situations warrant based on market conditions or changes in the client's personal or family obligations.

Accounts that are managed on a non-discretionary basis, will be done so in consultation with the client.

An individual representing DPM is designated as an IAR. This IAR may be designated as a Portfolio Manager (hereinafter called PM) for a client account. If so, the PM will be designated in the advisory contract.

An IAR of DPM may also be a securities licensed registered representative (hereinafter called RR) of Dominion.

At the inception of each client relationship, the client will be provided Part 2A and 2B of Form ADV which serves as DPM's required disclosure document for individual portfolio management services.

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### Tailored Relationships

The goals and objectives for each client are documented in the client account application. Clients may impose restrictions on investing in certain securities or types of securities. Such restrictions will be detailed in the advisory contract and the DPM will manage the account accordingly. Agreements may not be assigned without client prior written consent.

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### Asset Management

Assets are invested primarily in individual securities, exchanged traded funds (ETF's) or mutual funds (load-waived or no-load). Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. The brokerage firm charges a fee for stock and bond trades which is disclosed in the contract.

Investments may also include: equities (stocks), warrants, corporate debt securities, options, commercial paper, certificates of deposit, municipal securities, investment company securities, mutual funds shares and U. S. government securities. See page 6 for specific risk disclosure.

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### Termination of Agreement

DPM or the client may terminate an advisory contract with ten (10) days written notice to the other party.

If Part 2 of Form ADV is not delivered to the client at least forty-eight (48) hours prior to the client entering into any written contract with this investment adviser, then the client has the right to terminate the contract without penalty within five (5) business days after entering into the contract. For the purposes of this provision, a contract is considered entered into when all parties to the contract have signed the contract.

In cases where the account is terminated, all pre-paid and unearned advisory fees will be promptly refunded to the client.

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### Fees and Compensation (Item 5)

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#### **Discretionary**

A 2.00 % fee is charged on assets under management.\*

If client(s) have more than one account under management, the value of all accounts combined will be used to determine the current fee to be paid.

Similar services may be found for lower fees within the industry.

*\*Fees may be negotiable*

#### **Non-Discretionary**

A 2.00 % fee is charged on assets under management.\*If client(s) have more than one account under management, the value of all accounts combined will be used to determine the current fee to be paid.

Similar services may be found for lower fees within the industry.

*\*Fees may be negotiable*

### **Third Party Money Managers**

DPM is compensated by reallocation of fees that the third party money manager collects. DPM's fee schedule does not apply to third party money managers.

DPM does not do billing when third party management companies are managing the client account. These accounts are held at broker/dealers unaffiliated with DPM and the fees are billed and collected by the third party money manager. The third party manager does all calculations. The billing by the third party money manager includes the DPM fee which is collected and then paid to DPM. These items are disclosed in the client's contract with the third party money manager.

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#### **Assets Under Management**

DPM had \$133,638,963 under management as of 12-31-2019.

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#### **Fee Billing**

Advisory fees will be billed quarterly in advance of the services provided. Amounts are based on the portfolio value on the last day of the previous quarter. For accounts that are opened or closed during a calendar quarter, the fee payable will be pro-rated for the period.

DPM or the client may terminate an advisory contract with ten (10) days written notice to the other party. In cases where the account is terminated, all pre-paid and unearned advisory fees will be promptly refunded to the client. The refund of a fee is determined as follows: the daily rate is calculated by dividing the quarterly fee by the number of days in the quarter. The refund is equal to the daily rate times the number of days remaining in the quarter including the day of notice from the client.

Typically, DPM will receive its fees on a directly deducted basis, that is, the client will authorize DPM to have the advisory fee directly deducted from the account through our advisory contract wherein the client advises their custodian to pay the fee. DPM will send a quarterly invoice to the client that reflects the period covered, the amount of assets that the fee was based on, the percentage fee, the calculation of the fee and amount due. Each client will receive a statement from their custodian, at least quarterly, showing all debits and credits to the account, including fees payable to DPM. If a client's account does not have sufficient cash or cash equivalents to pay fees due, an appropriate amount of assets will be liquidated to cover the fee.

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#### **Other Fees**

DPM does not charge fees in addition to commissions and/or markups. Commissions are charged by Dominion which is DPM's affiliated Broker/Dealer. All of the commissions and fees are disclosed and established in the contract. Advisory Fees are not reduced to offset commissions on DPM accounts.



**Dominion Commission Costs for DPM Client Accounts**

|                                 |                               |
|---------------------------------|-------------------------------|
| Equities                        | \$15.00 per transaction       |
| OTC Equities                    | \$15.00 per transaction       |
| Option Exercise and assignments | \$14.00 + \$1.00 per contract |

Mutual Funds (includes UIT's)

|                               |                        |
|-------------------------------|------------------------|
| Networked                     | \$ 5.00 per ticket     |
| Transfer Accommodation        | \$25.00 (de-network)   |
| Exchanges (within the family) | \$ 5.00 per round trip |
| Periodic Investment Plan      | \$ 2.50 per ticket     |

**BONDS**

|  |                     |
|--|---------------------|
| Municipal Bonds                                    | \$15.00 per ticket  |
| Listed Bonds                                       | \$20.00 per ticket  |
| OTC Corporate Bonds                                | \$20.00 per ticket  |
| U.S. Treasuries                                    | \$25.00 per ticket  |
| Agencies   | \$25.00 per ticket  |
| Bond Maturity Redemption Fee<br>(Excludes T-Bills) | No fee at this time |

|                                 |                    |
|---------------------------------|--------------------|
| Money Market Instruments (CD's) | \$20.00 per ticket |
|---------------------------------|--------------------|

Transactions are assessed a \$2.45 postage/service fee

HTS deducts an annual \$35.00 IRA fee from the account (waived the first year). HTS charges a charges an account a \$50.00 termination fee. (Please refer to item 5 for detail of HTS's relationship with DOMI and DPM).

Third party money manager's fees are disclosed in their ADV fee schedule

DPM, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

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### Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to DPM.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

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### Past Due Accounts and Termination of Agreement

DPM reserves the right to stop work on any account that is more than 30 days overdue. In addition, DPM reserves the right to terminate any management agreement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in DPM's judgment, to providing proper financial advice. Any unearned portion of fees collected in advance will be refunded within 5 days.

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### Performance-Based Fees (Item 6)

#### Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

DPM does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

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### Types of Clients (Item 7)

#### Description

DPM may provide investment advice to individuals, high net worth individuals and businesses. Client relationships vary in scope and length of service.

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### Account Minimums

For accounts held at HTS, due to DPM's minimum managed account fee and other expenses client accounts may experience, DPM has determined that it is not advisable to accept accounts of less than \$25,000. Should market conditions subsequently cause the account value to fall below \$25,000 it will not automatically be terminated. However, the client should be advised that continued managed account status may no longer be a good value should the account value drop below \$15,000. Under certain circumstances, exceptions to the minimum account size may be granted at the President's discretion.

For an account held directly at a mutual fund group, DPM will follow the policy of the fund group and also their minimum account size.

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### Methods of Analysis, Investment Strategies and Risk of Loss (Item 8)

#### Methods of Analysis

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Technical analysis** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

**Charting analysis** strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be assuming that past performance will be indicative of future performance. This may not be the case.

**Economic analysis** focuses on how economic conditions may impact securities.

### Investment Strategies

Long-term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading, short sales, margin transactions, and options generally hold greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

The adviser generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. However, it may utilize options when account appropriate. Options generally hold greater risk of capital loss and clients should be aware that there is a material risk of loss using any of those strategies. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond “fixed income” nature (lower risk) or stock “equity” nature (mentioned above).

**Equity** investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

**Treasury Inflation Protected/Inflation Linked Bonds:** The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing price value, albeit rather minimal.

**Fixed Income** is an investment that promises fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc. Investing in fixed income carries the risk of capital loss.

**Debt securities** carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations. Investing in debt securities carries the risk of capital loss.

**Stocks & Exchange Traded Funds (ETF):** Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy).

**REITs** have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares. Investing in REITS carries the possible risk of capital loss.

**Precious Metal ETFs** (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal): Investing in precious metal ETFs carries the possible risk of capital loss.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Short term trading** risks include liquidity, economic stability and inflation and possible loss of capital.

**Options** involve a contract to purchase or sell a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value and the possibility of leveraged loss of trading capital due to the leveraged nature of stock options. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option writing also involves risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk, interest rate risk and possible loss of capital.

**Past performance is not a guarantee of future returns. Investing in any securities involves a risk of loss that you, as a client, should be prepared to bear.**

DPM may employ different investment strategies that are determined by consultation and the objectives of the Client. These strategies primarily use common stock, ETF's and open end and closed end mutual funds. The resulting portfolios are not always diversified. Some strategies may include the use of treasury securities, option, fixed income (debt securities) and real estate investment trusts.

The client may change these objectives at any time.

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#### Risk of Loss

All investment programs have certain risks that are borne by the investor. Investing in securities involves risk of loss Clients should be prepared to bear. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of clients who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

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#### Disciplinary Information (Item 9)

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##### Legal and Disciplinary

The firm paid \$122,200 in 2019 to settle client complaints against an advisor.

Richard Havard, Investment Advisor Representative, was reprimanded by the Texas State Securities Board and fined \$7,500 in 2017.

Robert Werr, Investment Advisor Representative, was subjected to heightened supervision by the Illinois Securities Department for a period of 12 months commencing in March 2019.

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#### Other Financial Industry Activities and Affiliations (Item 10)

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##### Affiliations

DPM has arrangements that are material to its advisory business or its clients with a related entity which is a broker/dealer. Please refer to the section "Brokerage Practices" for complete details.

DPM has affiliations with other investment advisers under an agreement. DPM receives compensation from the third party investment advisers but does not otherwise receive any additional fees from the client. DPM has no other business relationship with third party investment advisers. The investment advisers that DPM currently has arrangements with are listed on page 1. DPM does not have a material conflict of interest with these investment advisers.

Some of DPM's IAR's own an accounting firm or an insurance company (see Part 2B for information). DPM does not control the accounting firm or insurance company.

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

**DPM Code of Ethics and Personal Securities Transactions:** Federal and SRO registered personnel, employees and members of their immediate family for potential violations of insider trading rules, front-running, free-riding and withholding. In addition, DPM now also monitors for evidence of mutual fund arbitrage trading.

To facilitate review and supervision of its associated persons personal and familial securities accounts, DPM most strongly encourages each IAR and employee to maintain all non-employer sponsored securities accounts through DPM. Individuals that prefer to hold personal or familial accounts at another institution or possess certificates will be held to strict adherence to the rules of ensuring copies of all statements and transactions are promptly forwarded to DPM for review and inclusion in the IAR's file. It is the IAR'S responsibility to ensure copies of statements are delivered to DPM. IAR's holding accounts at other broker-dealers will be charged reasonable fees for supervision of outside accounts

Personnel who fail to ensure or are negligent in providing required documents as specified above will be compelled to hold their accounts at DPM. The sanction for willful evasion of DPM's supervisory requirements is immediate termination.

DPM has adopted the following Code of Ethics relative to personal securities transactions and our insider trading policy:

**DPM CODE OF ETHICS**

Dominion Portfolio Management is an investment adviser registered with the Securities and Exchange Commission to engage in the investment advisory business. SEC Rule 204A-1 (the Rule) requires all RIA's to have a code of ethics to which all access persons must adhere. This Code of Ethics (Code) requires all IAR's to know, acknowledge and comply with all applicable securities laws. The Code is intended to reflect the fiduciary principles and standards that regulate the conduct of DPM RIA and its associated and access persons. The Code includes provisions covering Insider Trading, confidentiality of client information, spreading rumors, acceptance of gifts and business entertainment items (and reporting thereon). All of these are detailed in the following sections.

- A(1) Individuals covered by the Code – any person deemed to be an access person. This would include all DPM Main Office personnel that may have access to client files, trading and personal client information.
- A(2) All IAR's and any potential access person will be required to execute acknowledgement of the Code. Additionally, all personnel are required to disclose any financial interest that may impact their duties or potentially create conflicts of interest.

B. Protection of non-public information

1. Confidential client information – in the normal process of business DPM IAR's may receive confidential client information. This client information is subject to Regulation S-P.
2. Material non-public information – insider trading. See Section 4.8 of the DPM Compliance Manual.

C. Personal Securities Transactions

The staff and IAR's of DPM are allowed to have securities accounts to own securities that are also owned by clients. These transactions (buy/sell/exchange) are subject to numerous restrictions to prevent conflicts of interest or in any other way interfere with the portfolio

management obligations of DPM. The Code specifically prohibits transactions in advance of customer transaction (aka frontrunning) to prevent possible abuses. Additionally, since most IAR's are also series 7 registered RRs, they are prohibited from soliciting transaction in securities in advance of DPM clients. Exceptions to this restriction are batched transactions with clients where there is no reason to believe there would be any impact on client prices. In the event of partial fills client accounts will always be prioritized. Open ended mutual funds that price after-market daily are not subject to these restrictions.

In the event DPM participates in an IPO for client accounts, IAR's will not receive allocations of the IPO but may purchase in the aftermarket.

All of the following are always prohibited:

1. Defraud a client in any manner
2. Mislead a client; including omitting omissions of material fact
3. Engage in any act or practice that will deceive a client
4. Engage in any manipulative with clients or securities
5. Favor one client over another

All DPM Access persons are required to disclose any significant gifts or entertainment over \$100 that is business related.

All DPM access persons are required to acknowledge this Code and the associated compliance manual no less than annually.

Penalties for violations to include warnings, suspension and termination.

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Participation or Interest in Client Transactions

DPM, its employees and IAR's, with knowledge of DPM's trading activity, may buy or sell publicly traded securities that are also held by clients. Employees and IAR's may not trade their own securities within a time frame ahead of client trades that may affect client transactions. Employees and IAR's comply with the provisions of the DPM Compliance Manual. DPM does not recommend securities in which DPM or related persons has a material financial interest other than publicly traded securities as described earlier in this paragraph.

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### Personal Trading

The Chief Compliance Officer of DPM is Shirley Crisler. The CCO reviews employee and IAR's trades each quarter that were previously reviewed by Rix Smith. The personal trading reviews ensure that the personal trading of employees and IAR's does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small relative to the volume in the securities being traded, the trades have little or no effect on those securities. DPM does monitor transactions regardless.

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### Brokerage Practices (Item 12)

#### Selecting Brokerage Firms

Dominion is an introducing broker/dealer who has established agreements with HTS, a member of FINRA and SIPC, to provide execution of orders and custody of client's cash and securities.

DPM believes the conflicts of interest in recommending Dominion/HTS as their preferred broker/dealer arrangement is mitigated by improvement in transaction costs to the client, along with transaction speed, reliability, internal audit capability and general efficiency.

Dominion routinely monitors the quality of client trade executions to ensure clients are receiving the best available execution price among the competing stock exchanges and market-makers. Transaction costs paid to Dominion are fixed flat-rate fees for advisory accounts. A copy of the transactions cost schedule is provided to the client as part of the advisory contract.

DPM believes that the transaction, HTS custody and clearing costs available through the Dominion/HTS arrangement are continuously monitored and have been and remain competitive.

Refer to the section "Other Fees" on page 4 regarding IRA annual fee charges.

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#### Best Execution

DPM's executed trades are reviewed daily by Dominion for quality of execution. DPM does not receive any portion of the clearing charges.

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#### Soft Dollars

DPM has no "soft dollar" arrangements with HTS or Dominion to provide additional goods or services (such as security research or portfolio software) in exchange for direction of the client's brokerage account. The services used by DPM are available without reservation to all users of the HTS trading platform. As part of its fiduciary obligation to its clients, DPM will monitor transaction related costs to its client's accounts for reasonableness with prevailing market costs.

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#### Order Aggregation

All accounts are individually managed. Order aggregation benefits are minimal in these circumstances. Therefore, DPM rarely aggregates orders. DPM does not see a cost benefit to order aggregation as transaction costs are fixed regardless of the number of shares.



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#### Review of Accounts (Item 13)

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##### Periodic Reviews

DPM managed accounts are reviewed by Rix Smith (additional information about Mr. Smith can be found in Part 2B). Mr. Smith reviews the account holdings no less than on a monthly basis to ensure that the account continues to reflect the client's stated account objectives.

Reviews will be held at least annually between the assigned IAR and the client to discuss an account that is managed by a third party manager. More frequent reviews, as determined by the IAR and client, may be conducted based on economic events, changes in markets or client circumstances.

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##### Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's personal situation.

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##### Performance Reports

Written quarterly performance reports are provided to DPM clients. Clients are urged to compare the account statements received directly from their custodian to the performance report statements provided by DPM.

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#### Client Referrals and Other Compensation (Item 14)

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##### Incoming Referrals

DPM has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

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##### Referrals Out

DPM does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them. DPM does receive fees from third party money managers for their management of DPM client accounts. See other fees in item 5.

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##### Other Compensation – None

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#### Custody (Item 15)

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##### Account Statements

Unless the client(s) have chosen an outside money manager, all assets are held at HTS which provides account statements directly to clients at their address of record at least quarterly. Clients are encouraged to compare these account statements they receive from the qualified custodian to invoices and reports they receive from DPM.

DPM does not have custody of any client funds or securities, except for its authorization for deduction of management fees.

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#### Investment Discretion (Item 16)

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##### Discretionary Authority for Trading

For all discretionary portfolio management clients, DPM will be provided with full, discretionary authority to pick which securities and the amount of securities for the purchase and sale in the client's account, without obtaining specific client consent. The purchases and sales will be guided by the stated investment objectives of each client. A client may impose reasonable restrictions (identified in the client contract) on the services provided for the account (for example, indication that no tobacco or defense stocks may be purchased). All such restrictions shall be documented to DPM in writing. They may be amended in writing and will be implemented when accepted by DPM. DPM reserves the right to refuse or terminate any client account (pursuant to the contract's termination clause) if the client imposes unreasonable restrictions as determined by DPM.

Non-discretionary contracts do not include any discretionary authority.

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##### Limited Power of Attorney (for discretionary accounts only)

A limited power of attorney is included in the contract for the purpose of discretionary account management.

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#### Voting Client Securities (Item 17)

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##### Proxy Votes

Each party to DPM's Investment Advisory Agreement acknowledges that client(s) will make decisions on the voting of proxies unless DPM is authorized to do so. If authorized, DPM will always vote in the best interest of the client(s). The client(s) have to indicate on the contract if DPM is not authorized to vote proxies. DPM does not invest in securities that will result in conflicts with client interests. A client may ask how their proxies were voted as any time. DPM may choose not to vote.

DPM reviews the following prior to voting to determine whether we believe they are in our clients' best interest:

1. Director nominee
2. Proposals that affect shareholder rights
3. Share par value adjustments, dilutive issuance, recapitalization plans, share repurchase plans, management incentive plans and any other items that may affect shareholder interest.

Below are our policies and procedures for determining each vote. A client may request information on why any vote was made at any time.

DPM votes yes only on items that we believe are positive or neutral relative to the investment in our clients' interests. We vote no when we determine the outcome is likely negative. We may decline to vote on an item when uncertain.

If subject to ERISA, all decisions are reserved to the trustee or a named fiduciary of client(s) account.

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#### Financial Information (Item 18)

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##### Financial Condition

DPM does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. DPM has never filed for bankruptcy protection.

A balance sheet is not required to be provided because DPM does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$500 per client, six months or more in advance.

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#### Business Continuity Plan

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##### General

DPM has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

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##### Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident.

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##### Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

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##### Loss of Key Personnel

DPM office personnel are able to implement strategies in the event of Rix Smith's serious disability or death.

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#### Information Security Program

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##### Information Security

DPM maintains an information security program to reduce the risk that your personal and confidential information may be breached.

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##### Privacy Notice

DPM is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your written permission, DPM will disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by mail, fax, email, or in person. DPM shares information about you with Dominion and HTS in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We restrict access to your information physically and electronically.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this Privacy Notice to you annually, in writing.

**Firm Brochure Supplement  
(Part 2B of Form ADV)**

**CRD 106918**

**DOMINION PORTFOLIO MANAGEMENT, INC.  
9000 HIGHWAY 2147 WEST, SUITE 201  
HORSESHOE BAY, TEXAS 78657**

**210-265-8050**

**210-764-5353 (FAX)**

**Email: shirley.dpm@domiinvestors.com**

The attached brochure supplements provide information about the educational and business backgrounds, business addresses and telephone numbers of the Investment Advisor Representatives of Dominion Portfolio Management, Inc. You should have received a copy of that brochure. Please contact Shirley Crisler, Senior Vice President, if you did not receive Dominion Portfolio Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Dominion Portfolio Management, Inc. and its Investment Advisor Representatives is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

04-01-2020

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Rix Smith, CRD #1061442  
9000 Highway 2147 West, Suite 201  
Horseshoe Bay, Texas 78657  
210-265-8050

**Date of Birth:** 01-13-1956

**Educational Background:** BS, Our Lady of the Lake University, San Antonio, Texas, 1979

**Business Experience:**

|                        |  |
|------------------------|--|
| <u>1991 to 1992</u>    | Dominion Investor Services, Inc.<br>Executive Vice President, Registered Representative  |
| <u>1992 to Present</u> | Dominion Investor Services, Inc.<br>President/Director, Principal and Registered Representative  |
| <u>1995 to Present</u> | Dominion Financial Services, Inc. (holding company of<br>Dominion Investor Services and Dominion Portfolio Management)<br>President/Director |
| <u>1995 to Present</u> | Dominion Portfolio Management, Inc.<br>President/Director/Management/Investment Advisor Representative                                       |

**Designations:** None

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** Rental property

**Additional Compensation:** Rental income

Supervisor: DPM's Board of Directors  
Phone: 210-265-8050  
Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)

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Phil Bryant, CRD #1487327  
2802 N. Highland Avenue, Suite B  
Jackson, Tennessee 38305  
731-664-5300

**Date of Birth:** 11-22-1956

**Educational Background:** Jackson State Community College, Jackson, Tennessee;  
Middle Tennessee State University, Murfreesboro, Tennessee

**Business Experience:**

|                        |  |
|------------------------|--|
| <u>1999 to Present</u> | Dominion Investor Services, Inc<br>Principal and Registered Representative |
| <u>2004 to 2017</u>    | Caldwell and Bryant Financial Advisors, Inc.<br>Partner                    |
| <u>2011 to Present</u> | Dominion Portfolio Management, Inc.<br>Investment Advisor Representative   |
| <u>2017 to Present</u> | Stonebridge Investment Advisors, LLC<br>Managing Partner                   |

**Designations:** None

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** Chairman of the Madison County Tennessee Election Commission. Serves on the West Tennessee Healthcare Board of Trustees. Also writes life insurance, disability and fixed annuities, rental property and office space.

**Additional Compensation:** Madison County, Tennessee, insurance, rental property and office space.

Supervisor: Rix Smith  
Phone: 210-265-8050  
Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)

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Robert Caldwell, CRD #2730650  
2802 N. Highland Avenue, Suite A  
Jackson, Tennessee 38305  
731-668-5665

**Date of Birth:** 08-10-1950

**Educational Background:** BS, Economics and Accounting, Lambuth University, Jackson, Tennessee, 1972; BS, Trust and Administration, National Graduate Trust School, Northwestern University, 1979

**Business Experience:**

|                        |  |
|------------------------|--|
| <u>1996 to Present</u> | Robert A. Caldwell, CPA  |
| <u>2000 to Present</u> | Dominion Investor Services, Inc.<br>Registered Representative            |
| <u>2004 to 2017</u>    | Caldwell and Bryant Financial Advisors, Inc.<br>Partner                  |
| <u>2005 to Present</u> | Dominion Portfolio Management, Inc.<br>Investment Advisor Representative |
| <u>2017 to Present</u> | Caldwell Financial Group<br>Owner  |

**Designations:** Certified Public Accountant, passed the Uniform CPA Examination, received a baccalaureate or graduate degree, U.S. Treasury Enrolled Agent

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** Licensed CPA, an enrolled agent and federal licensed agent to represent taxpayers before the Internal Revenue Service. Sell fixed annuities, life, health, disability and long term care insurance. Family mediator in dispute resolution. Services as trustee, executor and conservator, Board Member of West Tennessee Healthcare Foundation, Caldwell Estate Solutions, Caldwell Capital Management, LLC, services as an ordained Minister.

**Additional Compensation:** CPA practice, agent representative of taxpayers, family dispute resolution and insurance products

Supervisor: Rix Smith  
Phone: 210-265-8050  
Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)



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Tom Brister, CRD #30834  
32180 Inverness Drive  
Evergreen, Colorado 80439  
303-674-6602

**Date of Birth:** 01-06-1940

**Educational Background:** BBA, University of Mississippi, Oxford, Mississippi, 1962

**Business Experience:**

1989 to Present      Financial Advisory by Thomas S. Brister  
Certified Financial Planner

1991 to Present      Dominion Investor Services, Inc.  
Registered Representative

2006 to Present      Dominion Portfolio Management, Inc.  
Investment Advisor Representative

**Designations:** Certified Financial Planner, received a bachelor's degree or its equivalent

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** Life, health, disability and index annuities insurance. Occasionally assists clients with the purchase of precious metals, coins and gems, 11 hours per week, 7 during trading hours

**Additional Compensation:** Commissions from insurance and precious metals, coins and gems.

Supervisor: Rix Smith  
Phone: 210-265-8050  
Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)

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Alex Brister, CRD #2772222  
32180 Inverness Drive  
Evergreen, Colorado 80439  
303-674-6602

**Date of Birth:** 03-14-1964

**Educational Background:** BA, Colorado State University, Ft. Collins, Colorado, 1987

**Business Experience:**

1988 to Present      Financial Advisory by Thomas S. Brister  
Director of Operations

1996 to Present      Dominion Investor Services, Inc.  
Registered Representative

2011 to Present      Dominion Portfolio Management, Inc.  
Investment Advisor Representative

**Designations:** None

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** None

**Additional Compensation:** None

Supervisor: Rix Smith  
Phone: 210-265-8050  
Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)

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Joyce Briskin, CRD #708049  
919 Arizona Ash  
San Antonio, Texas 78232  
210-495-3224

**Date of Birth:** 04-17-1945

**Educational Background:** B.Ph., Northwestern University, Evanston, Illinois

**Business Experience:**

1995 to Present      Dominion Investor Services, Inc.  
Registered Representative

2006 to Present      Dominion Portfolio Management, Inc.  
Investment Advisor Representative

**Designations:** None

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** None

**Additional Compensation:** None

Supervisor: Rix Smith  
Phone: 210-265-8050  
Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)

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Pamela Booton, CRD #871613  
5955 Lomita Verde Circle  
Austin, Texas 78749  
512-473-6046

**Date of Birth:** 12-01-1952

**Educational Background:** BA in Mathematics, The University of Texas at Austin

**Business Experience:**

1986 to Present      Self Employed  
Insurance and fixed annuities

2005 to Present      Dominion Investor Services, Inc.  
Registered Representative

2006 to Present      Dominion Portfolio Management, Inc.  
Investment Advisor Representative

**Designations:** None

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** Director Alamo Bay Press

**Additional Compensation:** None

Supervisor: Rix Smith  
Phone: 210-265-8050  
Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)

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Randall W. Smith, CRD #2947453  
9000 Highway 2147 West, Suite 201  
Horseshoe Bay, Texas 78657  
210-265-8050

**Date of Birth:** 10-16-1957

**Educational Background:** BA, North Texas State University, Denton, Texas, 1980;  
MBA, University of Texas, San Antonio, Texas, 1991

**Business Experience:**

|                        |   |
|------------------------|---|
| <u>1985 to Present</u> | Circle R Ranch<br>Self Employed Ranching                                    |
| <u>1997 to Present</u> | Dominion Investor Services, Inc.<br>Principal and Registered Representative |
| <u>2001 to Present</u> | Dominion Insurance Services, Inc.<br>Vice President and part owner          |
| <u>2011 to Present</u> | Dominion Portfolio Management, Inc.<br>Investment Advisor Representative    |

**Designations:** None

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** Property manager at SMWLV, LP, rental property

**Additional Compensation:** Property management, rental income

Supervisor: Rix Smith  
Phone: 210-265-8050  
Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)

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John Ernest "Ernie" Boyd, CRD #2274165  
615 SW 8<sup>th</sup> Avenue  
Amarillo, Texas 79101  
806-374-3662

**Date of Birth:** 05-16-1962

**Educational Background:** BBA Finance and Economics, Baylor University; Hankamer School of Business, Waco, Texas, 1984

**Business Experience:**

1985 to Present      Boyd Financial Services, Inc.  
The Boyd Agency, Inc.  
Group 1 Life and Health and Property and Casualty

1995 to Present      Dominion Investor Services, Inc.  
Principal and Registered Representative

2011 to Present      Dominion Portfolio Management, Inc.  
Investment Advisor Representative

**Designations:** None

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** Shareholder in Six-Fifteen Properties, LLC, entity that owns commercial property including the office building that Boyd Agency occupies which leases to other tenants. Passive investment in Take Aim Shooting Complex, LLC, an indoor shooting range.

**Additional Compensation:** The Boyd Agency, Six-Fifteen Properties, LLC and Take Aim Shooting Complex, LLC

Supervisor: Rix Smith  
Phone: 210-265-8050  
Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)

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Kimberly A. Melton, CRD #4394894  
2802 N. Highland Avenue, Suite B  
Jackson, Tennessee 38305  
731-664-5300

**Date of Birth:** 07-25-1975

**Educational Background:** Bachelor of Arts, Economics, 1997 Murray State University, Murray, Kentucky

**Business Experience:**

|                        |  |
|------------------------|--|
| <u>2001 to 2006</u>    | Morgan Keegan and Company  |
| <u>2006 to 2007</u>    | Bear Stearns and Company   |
| <u>2008 to 2010</u>    | Community South Bank   |
| <u>2010 to 2012</u>    | First Bank Investment Partners/Invest Financial                          |
| <u>2012 to Present</u> | Dominion Investor Services, Inc.<br>Registered Representative            |
| <u>2012 to Present</u> | Dominion Portfolio Management, Inc.<br>Investment Advisor Representative |
| <u>2017 to Present</u> | Stonebridge Investment Advisors, LLC<br>Managing Partner                 |

**Designations:** None

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** Licensed as an insurance agent with various insurance providers for life and health, 1 hour per week spent during trading hours

**Additional Compensation:** Commissions from insurance products

Supervisor: Rix Smith  
Phone: 210-265-8050  
Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)

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Douglas J. Ellis, CRD #5661912  
2620 South Cleveland Avenue  
Saint Joseph, Michigan  
269-281-0094

**Date of Birth:** 05-02-1963

**Educational Background:** Did not attend college following high school

**Business Experience:**

|                        |  |
|------------------------|--|
| <u>2006 to 2009</u>    | Self Employed, Insurance Agent<br>Employer sponsored benefits design and implementation              |
| <u>2009 to 2010</u>    | Self Employed, Insurance Agent<br>Employer Benefits Specialist Design and Implementation             |
| <u>2009 to 2010</u>    | Princor<br>Registered Representative   |
| <u>2010 to 2016</u>    | Safe Harbor Group Benefits<br>President, Benefits Specialist Design/Implementation and Education     |
| <u>2010 to 2016</u>    | Hartwell and Wolf<br>Partner   |
| <u>2010 to 2016</u>    | USA Financial Securities<br>Registered Representative, Advisor Representative                        |
| <u>2016 to Present</u> | Safe Harbor Group Benefits<br>President, Benefits Specialist Design and Implementation and Education |
| <u>2016 to Present</u> | Dominion Investor Services, Inc.<br>Registered Representative  |
| <u>2016 to Present</u> | Dominion Portfolio Management, Inc.<br>Investment Advisor Representative                             |

**Designations:** None

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** President, Safe Harbor Group Benefits Insurance, approximately 30 hours during trading hours

**Additional Compensation:** Commissions from insurance products

Supervisor: Rix Smith

Phone: 210-265-8050

Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)



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Michael D. Bradford, CRD #3189397  
1400 Broadfield, Suite 200  
Houston, Texas 77084  
281-687-0908

**Date of Birth:** 07-17-1961

**Educational Background:** BS, Northeastern Oklahoma State University, Tahlequah, Oklahoma

**Business Experience:**

|                        |   |
|------------------------|---|
| <u>1999 to 2011</u>    | Morgan Stanley<br>Financial Advisor   |
| <u>2011 to 2015</u>    | Merrill Lynch Pierce Fenner & Smith/Bank of America<br>Assistant Vice President/Financial Advisor |
| <u>2015 to 2016</u>    | LPL Financial Services<br>Wealth Manager  |
| <u>2016 to Present</u> | Michael Bradford Investment and Retirement Solutions<br>Financial Advisor/Owner                   |
| <u>2016 to Present</u> | Dominion Investor Services, Inc.<br>Registered Representative                                     |
| <u>2016 to Present</u> | Dominion Portfolio Management, Inc.<br>Investment Advisor Representative                          |

**Designations:** None

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** None

**Additional Compensation:** None

Supervisor: Rix Smith  
Phone: 210-265-8050  
Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)

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William Dale Hester, CRD #1992112  
951 West Dallas Street  
Canton, Texas 75103  
903-567-6262

**Date of Birth:** 07-16-1954

**Educational Background:** Bachelor of Arts, Economics, University of New Mexico, Albuquerque, New Mexico, May 1976; Masters of Business Administration, Accounting and Finance, May 1977; Certified Public Accountant, January 1979

**Business Experience:**

|                        |  |
|------------------------|--|
| <u>1987 to Present</u> | W. Dale Hester Insurance Services<br>Owner                               |
| <u>1988 to Present</u> | Hester Financial Services, Inc.<br>Financial Consultant                  |
| <u>1990 to Present</u> | Hester Jason PC<br>Certified Public Accountant                           |
| <u>2005 to 2016</u>    | VSR Financial Services, Inc.<br>Registered Representative                |
| <u>2007 to 2016</u>    | VSR Advisory Services<br>Investment Advisor Representative               |
| <u>2016 to 2017</u>    | Summit Brokerage Services, Inc.<br>Registered Representative             |
| <u>2016 to 2017</u>    | Summit Financial Group, Inc.<br>Investment Advisor Representative        |
| <u>2017 to Present</u> | Dominion Investor Services, Inc<br>Registered Representative             |
| <u>2017 to Present</u> | Dominion Portfolio Management, Inc.<br>Investment Advisor Representative |

**Designations:** Certified Public Accountant, passed the Uniform CPA Examination, received a baccalaureate or graduate degree

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** Crooked Creek Water Supply, R4HR, Inc, R4HR Holdings, Inc., HCO Clearmark Financial & Insurance Services, LLC, HCO Four Trees Real Estate Services, LLC, Talisman Business Advisors, LLC (DBA TransWorld Business Advisors), Bison Creek Management Services, LLC, HomePlace Senior Solutions, Inc.

**Additional Compensation:** R4HR, Inc., R4HR Holdings, LLC, HCO Clearmark Financial & Insurance Services, LLC, Clearmark Financial and Insurance Services, HCO Four Trees Real Estate Services, LLC, Talisman Business Advisors, LLC (DBA TransWorld Business Advisors)

Supervisor: Rix Smith

Phone: 210-265-8050

Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)

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Drew E. Nixon, CRD #1610065  
1509 West Panola  
Carthage, Texas 75633  
903-693-9133

**Date of Birth:** 11-21-1959

**Educational Background:** Bachelor of Business Administration, Accounting, Stephen F. Austin State University, Nacogdoches, Texas, August 1982, Graduated Summa Cum Laude, Beta Alpha Psi: National Honors Accounting, Beta Gamma Sigma: National Honors Business, Certified Public Accountant, March 1984

**Business Experience:**

|                        |  |
|------------------------|--|
| <u>1984 to Present</u> | Drew Nixon, CPA  |
| <u>2005 to Present</u> | Texas Financial Center<br>Insurance Sales                                |
| <u>2005 to 2016</u>    | VSR Financial Services, Inc.<br>Registered Representative                |
| <u>2005 to 2016</u>    | VSR Advisory Services<br>Investment Advisor Representative               |
| <u>2011 to Present</u> | Nixon & Woodfin, CPAs  |
| <u>2016 to 2017</u>    | Summit Financial Group<br>Investment Advisor Representative              |
| <u>2016 to 2017</u>    | Summit Brokerage Services, Inc.<br>Registered Representative             |
| <u>2017 to Present</u> | Dominion Investor Services, Inc.<br>Registered Representative            |
| <u>2017 to Present</u> | Dominion Portfolio Management, Inc.<br>Investment Advisor Representative |

**Designations:** Certified Public Accountant, passed the Uniform CPA Examination, received a baccalaureate or graduate degree

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** Insurance, Real Estate Agent, Event Rentals and Rental Property. 8 hours a week during trading hours

**Additional Compensation:** Commissions from insurance products, real estate and event rental accessories

Supervisor: Rix Smith

Phone: 210-265-8050

Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)

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James E. (Jim) Hughes, Jr., CRD #2964182  
150 West Gibson Street, Suite 100  
Jasper, Texas 75951  
409-384-4441

**Date of Birth:** 01-10-1963

**Educational Background:** Associate of Science, Ranger College, Ranger, Texas 1983,  
Chartered Retirement Planning Counselor Designation, American College, Denver,  
Colorado

**Business Experience:**

|                        |  |
|------------------------|--|
| <u>1997 to Present</u> | Texas Financial Center<br>Insurance Sales                                |
| <u>2005 to 2016</u>    | VSR Financial Services, Inc.<br>Registered Representative                |
| <u>2009 to 2016</u>    | VSR Advisory Services<br>Investment Advisor Representative               |
| <u>2016 to 2017</u>    | Summit Financial Group<br>Investment Advisor Representative              |
| <u>2016 to 2017</u>    | Summit Brokerage Services, Inc.<br>Registered Representative             |
| <u>2017 to Present</u> | Dominion Investor Services, Inc.<br>Registered Representative            |
| <u>2017 to Present</u> | Dominion Portfolio Management, Inc.<br>Investment Advisor Representative |

**Designations:** Chartered Retirement Planning Counselor, requires a study of pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations.

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** James E. Hughes, Jr. dba Texas Financial Center, life and health insurance sales, agent/broker, Timberlake Insurance Group, LLC, property and casualty insurance sales, agent and minority owner, James E. Hughes, Jr. dba Hughes Renal Properties, real estate holdings company

**Additional Compensation:** Income from Texas Financial Center, Timberlake Insurance Company and Hughes Rental Property

Supervisor: Rix Smith  
Phone: 210-265-8050  
Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)

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Daryl Arnett, CRD #4495175  
7701 Creekside Drive  
Fishers, Indiana 46038  
317-709-5212

**Date of Birth:** 07-25-1962

**Educational Background:** BA, Hotel Restaurant and Institutional Management, 1985 graduate of Michigan State University

**Business Experience:**

|                        |   |
|------------------------|---|
| <u>2005 to 2008</u>    | Chase Investment Services Corporation<br>Registered Representative          |
| <u>2005 to 2008</u>    | Chase Investment Services Corporation.<br>Investment Advisor Representative |
| <u>2008 to 2010</u>    | Fifth Third Securities, Inc.<br>Registered Representative                   |
| <u>2008 to 2010</u>    | Fifth Third Securities, Inc.<br>Investment Advisor Representative           |
| <u>2010 to 2017</u>    | IFS Securities<br>Registered Representative                                 |
| <u>2010 to 2017</u>    | IFS Advisory, LLC<br>Investment Advisor Representative                      |
| <u>2017 to Present</u> | Dominion Investor Services, Inc.<br>Registered Representative               |
| <u>2017 to Present</u> | Dominion Portfolio Management, Inc.<br>Investment Advisor Representative    |

**Designations:** None

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** None

**Additional Compensation:** None

Supervisor: Rix Smith  
Phone: 210-265-8050  
Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)

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Doug S. Graumann, CRD #2497329  
101 S. Wenatchee Avenue, Suite C  
Wenatchee, Washington 98801  
509-665-9722

**Date of Birth:** 01-20-1966

**Educational Background:** BS Business Administration, Bellevue University, Bellevue, Nebraska

**Business Experience:**

|                        |  |
|------------------------|--|
| <u>1993 to 1998</u>    | Bank of America<br>Investment Advisor Representative   |
| <u>1998 to 2002</u>    | Pacific Northwest Bank<br>Vice President, Investment Advisor Representative                    |
| <u>2002 to 2004</u>    | Pacific Northwest Bank<br>Senior Vice President, Managing Director                             |
| <u>2004 to 2012</u>    | Pacific West Securities, Inc.<br>Registered Representative                                     |
| <u>2004 to 2012</u>    | Pacific West Financial Consultants, Inc.<br>Investment Advisor Representative                  |
| <u>2004 to Present</u> | DSG Group<br>Sole Proprietor   |
| <u>2012 to 2017</u>    | KMS Financial Services, Inc.<br>Registered Representative<br>Investment Advisor Representative |
| <u>2018 to Present</u> | Dominion Investor Services, Inc.<br>Registered Representative                                  |
| <u>2018 to Present</u> | Dominion Portfolio Management, Inc.<br>Investment Advisor Representative                       |

**Designations:** None

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** None

**Additional Compensation:** None

Supervisor: Rix Smith  
Phone: 210-265-8050  
Email: shirley.dpm@domiinvestors.com

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Reynaldo Batista, CRD #6322284  
3207 Fitzgerald Drive  
Montgomery, Texas 77356  
936-524-1879

**Date of Birth:** 10-14-1978

**Educational Background:** BA Finance, Associate of Computer Science, Ashford University, Clinton, Iowa

**Business Experience:**

|                        |  |
|------------------------|--|
| <u>2004 to 2014</u>    | Ralston Purina<br>Data Analyst/Business Analyst/IT                       |
| <u>2014 to 2017</u>    | Edward Jones<br>Financial Advisor  |
| <u>2018 to Present</u> | Dominion Investor Services, Inc.<br>Registered Representative            |
| <u>2018 to Present</u> | Dominion Portfolio Management, Inc.<br>Investment Advisor Representative |

**Designations:** None

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** Insurance sales, Registered IRS Tax Preparer

**Additional Compensation:** Insurance

Supervisor: Rix Smith  
Phone: 210-265-8050  
Email: shirley.dpm@domiinvestors.com

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Bryan Clemmons, CRD #6320510  
212 South Palestine  
Athens, Texas 75751  
903-292-5029

**Date of Birth:** 07-11-1970

**Educational Background:** Bachelor's Degree, BBA, Stephen F. Austin, Master's Degree, Stephen F. Austin

**Business Experience:**

|                        |  |
|------------------------|--|
| <u>2004 to 2008</u>    | Comfort ISD<br>High School Principal                                     |
| <u>2008 to 2013</u>    | Teague ISD<br>Assistant Superintendent                                   |
| <u>2013 to 2014</u>    | Contract Remodeling  |
| <u>2014 to 2018</u>    | Edward Jones<br>Financial Advisor  |
| <u>2018 to Present</u> | Dominion Investor Services, Inc.<br>Registered Representative            |
| <u>2018 to Present</u> | Dominion Portfolio Management, Inc.<br>Investment Advisor Representative |

**Designations:** None

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** None

**Additional Compensation:** None

Supervisor: Rix Smith

Phone: 210-265-8050

Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)



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Jason "Jay" Harper, CRD #2485864  
1135 Mary Kay Court  
Nemo, Texas 76070  
432-209-2391

**Date of Birth:** 11-02-1973

**Educational Background:** Bachelors of Science in Finance, Texas A & M University, May 1996; Master of Science in Finance, Texas Tech University, May 1998

**Business Experience:**

|                        |  |
|------------------------|--|
| <u>1998 to 2002</u>    | Edward Jones<br>Investment Representative                                |
| <u>2002 to 2009</u>    | LPL Financial Corporation<br>Financial Advisor                           |
| <u>2009 to 2011</u>    | Centaurus Financial, Inc.<br>Financial Advisor                           |
| <u>2011 to 2012</u>    | Wells Fargo Advisors Financial Network, LLC<br>Financial Advisor         |
| <u>2012 to 2018</u>    | Securities America, Inc.<br>Registered Representative                    |
| <u>2012 to 2018</u>    | Securities America Advisors, Inc.<br>Financial Advisor                   |
| <u>2018 to Present</u> | Dominion Investor Services, Inc.<br>Registered Representative            |
| <u>2018 to Present</u> | Dominion Portfolio Management, Inc.<br>Investment Advisor Representative |

**Designations:** None

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** Life and Health Insurance Agent

**Additional Compensation:** Insurance

Supervisor: Rix Smith  
Phone: 210-265-8050  
Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)

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Joy Lawrence, CRD #4776655  
9000 Highway 2147 West, Suite 201  
Horseshoe Bay, Texas 78657  
210-265-8050

**Date of Birth:** 12-14-1978

**Educational Background:** AA, San Antonio College, San Antonio, TX 2007

**Business Experience:**

|                        |  |
|------------------------|--|
| <u>2004 to 2011</u>    | Dominion Investor Services, Inc.<br>Administrative Assistant   |
| <u>2011 to Present</u> | Dominion Investor Services, Inc.<br>Customer Service Manager, Principal and Registered<br>Representative |
| <u>2012 to Present</u> | Dominion Portfolio Management, Inc.<br>Customer Service Manager and Investment Advisor Representative    |

**Designations:** None

**Disciplinary Information:** The individual has not been involved in any disciplinary or administrative proceedings.

**Other Business Activities:** None

**Additional Compensation:** None

Supervisor: Rix Smith  
Phone: 210-265-8050  
Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)

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Robert Werr, CRD #2376757  
2 Carriage Place  
Burr Ridge, Illinois 60527  
630-974-6363

**Date of Birth:** 02-06-1954

**Educational Background:** BS in Marketing, University of Illinois at Chicago, 1977

**Business Experience:**

|                        |  |
|------------------------|--|
| <u>1993 to 2019</u>    | Equity Services, Inc.<br>Registered Representative/Investment Advisor Representative |
| <u>1993 to Present</u> | National Life<br>Agent   |
| <u>2019 to Present</u> | Dominion Investor Services, Inc.<br>Registered Representative                        |
| <u>2019 to Present</u> | Dominion Portfolio Management, Inc.<br>Investment Advisor Representative             |

**Designations:** None

**Disciplinary Information:** Subjected to heightened supervision by the Illinois Securities Department for a period of 12 months commencing in March 2019.

**Other Business Activities:** Real estate rentals, agent for several insurance companies to sell life, health and disability insurance sales

**Additional Compensation:** From real estate rentals and insurance

Supervisor: Rix Smith  
Phone: 210-265-8050  
Email: [shirley.dpm@domiinvestors.com](mailto:shirley.dpm@domiinvestors.com)