



Item 1 Cover Page

DiMeo Schneider & Associates, L.L.C. WRAP FEE PROGRAM BROCHURE

**FORM ADV PART 2A
APPENDIX 1**

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This wrap fee program brochure provides information about the qualifications and business practices of DiMeo Schneider & Associates, L.L.C. ("DiMeo Schneider"). If you have any questions about the contents of this brochure, please contact the Compliance Department at 312-853-1000 or compliance@dimeoschneider.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.

DiMeo Schneider & Associates, L.L.C. is a registered investment adviser (SEC File Number 801-48820, CRD/IARD Number 106720). Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information about which you determine to hire or retain an adviser.

The information provided in this Brochure should not be considered a recommendation to purchase or sell any particular security.

Additional information about DiMeo Schneider is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

The following is a Summary of the Material Changes to the Part 2 Appendix 1, wrap fee disclosure brochure for DSA.

There are no material changes to this Appendix since DiMeo Schneider's last Wrap Fee Program Brochure dated March 27, 2019.

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Item 4 Services, Fees and Compensation

As used in this brochure, the words "we", "our" and "us" refer to DiMeo Schneider & Associates, L.L.C. ("DiMeo Schneider") and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm.

We offer discretionary and non-discretionary services through wrap-fee programs ("Program") as described in this wrap fee program brochure to clients including, but not limited to, individuals, non-profit organizations, endowments, foundations, charitable organizations, trusts and pension plans. We are both the sponsor and portfolio manager for the Program. A wrap-fee program is a type of investment program that provides clients with asset management and brokerage services for one fee. If you participate in our wrap fee program, you will pay DiMeo Schneider a single fee and you will not pay separate transaction charges imposed by the custodian of your account as we will absorb those charges. If we select a third-party manager to manage some of the assets in your account, and the manager retains discretionary authority over those assets, the manager may choose to place trades away from your custodian (so called "step-out" trades) in doing so, other commissions or mark-ups/mark-downs may apply and will generally be netted into the price you receive for the trade. These commission, mark-ups/mark-downs will not be listed separately on your custodial statement or trade confirmation.

Our investment advice in the Program is tailored to meet our clients' needs and investment objectives. At the inception of the relationship, we will conduct interviews with you to determine your investment objectives, risk tolerance and other relevant information and may review and/or develop an Investment Policy Statement. Based on the Investment Policy Statement and/or other relevant information, we will recommend an initial portfolio to you which may consist of model portfolios developed by our firm.

Once we construct an investment portfolio tailored to your goals, we will monitor your portfolio's performance on an ongoing basis, and will rebalance the portfolio as required by changes in market conditions and in your financial circumstances.

Accounts in the Program may be discretionary or non-discretionary. Discretionary authorization will allow DiMeo Schneider to determine the specific securities, and the amount of securities to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm or trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased for your account) by providing our firm with your restrictions and guidelines in writing. For non-discretionary accounts, we will obtain your approval prior to executing any transactions.

We will recommend unaffiliated third-party investment managers ("Managers") to manage a portion of your account. You will receive disclosure of the Manager's services, trading practices, fees and other relevant information at the inception of the relationship by way of the Manager's disclosure document. Fees charged by Managers are separate and, in addition to, the advisory fees charged by DiMeo Schneider. These fees are not included in the Program fee.

The Program Fee

We charge an annual "wrap-fee" or Program fee for participation in the Program. Our negotiable fee ranges up to 1.5% of your assets under management. Your specific fee schedule will be detailed in the Investment Management Agreement. When we calculate your assets under management, we will include assets placed with third-party investment managers ("Managers"). Under no circumstances will we require prepayment of a fee more than six months in advance and in excess of \$1,200.

The Program fee is billed and payable quarterly in advance based on the value of your account on the last day of the previous quarter. If the client agreement is executed at any time other than the first day of a calendar quarter, our fees will apply on a pro rata basis, which means that the Program fee is payable in proportion to the number of days in the quarter for which you are a client.

Generally, the custodian of your account will directly debit our fee from your account. The custodian will deduct the Program fee only when you have given written authorization permitting the fees to be paid directly from your account. Further, the qualified custodian will deliver an account statement, a link or provide online access for your account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy. If you would prefer to pay your fee directly to DiMeo Schneider, please contact us to set up appropriate arrangements.

When you receive fee notices from DiMeo Schneider, we encourage you to reconcile our fee notices with the statement(s) you receive from the qualified custodian. If you find any inconsistent information between our fee notice and the statement(s) you receive from the qualified custodian please call our main office number located on the cover page of this brochure.

Termination of Advisory Relationship

Either party may terminate the client agreement upon 30-days' written notice to the other party. The Program fee will be prorated for the quarter in which the termination notice is given and any unearned fees will be refunded to you.

Upon termination of accounts held at the client's custodian, the custodian will deliver securities and funds held in the account per your instructions unless you request that the account be liquidated. After the wrap fee program agreement has been terminated, transactions are processed at the prevailing brokerage rates/fees. For information on these fees, please contact your custodian.

Wrap Fee Program Disclosures

- You should be aware that participating in a wrap fee program may cost more or less than the cost of purchasing advisory, brokerage, and custodial services separately from other advisers or broker-dealers.
- The Program may create a potential conflict of interest between you and our firm. You should be aware that we may have a disincentive to purchase or sell securities in your account because we pay the transaction costs associated with trades directed to the custodian/broker-dealer.
- In determining whether to establish a Program account, you should be aware that the overall cost of the Program to you may be higher or lower than what you might incur by purchasing separately the types of

securities available in the Program. In order to compare the cost of the Program with unbundled services, you should consider the turnover rate in investment strategies used, trading activity in the account and standard advisory fees and brokerage commissions that would be charged at your custodian/broker-dealer or at other broker-dealers and investment advisers. Depending upon the percentage wrap-fee charged by our firm (as described more fully above), the amount of portfolio activity in your account, and the value of custodial and other services provided, the wrap-fee may or may not exceed the aggregate cost of such services if they were to be provided separately and/or if we were to negotiate transaction fees and seek best price and execution of transactions for your individual account.

- The benefits under a wrap fee program depend, in part, upon the size of the account, the management fee charged, and the number of transactions likely to be generated in the account. For example, a wrap fee program may not be suitable for accounts with little trading activity. In order to evaluate whether a wrap fee program is suitable for you, you should compare the wrap fee and any other costs of the Program with the amounts that would be charged by other advisers, broker-dealers, and custodians, for advisory fees, brokerage and other execution costs, and custodial services comparable to those provided under the Program.

Additional Fees and Expenses

The Program fee includes the costs of brokerage commissions for transactions executed through the independent, qualified custodian and charges relating to the settlement, clearance, or custody of securities in the account. The Program fee does not include mark-ups and mark-downs, dealer spreads or other costs associated with the purchase or sale of securities, interest, taxes, or other costs, such as national securities exchange fees, charges for transactions not executed through the qualified custodian, costs associated with exchanging currencies, wire transfer fees, or other fees required by law or imposed by third parties. Your account will be charged for these additional fees and expenses.

As part of our investment advisory services to you, we may invest, or recommend that you invest in mutual funds and ETFs. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses mutual funds or ETFs (described in each fund's prospectus) charge their shareholders. These fees will generally include a management fee and other fund expenses. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, ETFs, our firm, and others. Information on mutual fund and ETF charges can be found in the fund's prospectus, while our firm's charges can be found in Item 5 of our ADV Part 2A or your contract.

As part of our investment advisory services to you, we will likely recommend Managers. These Managers will charge a fee for their investment services that will be separate and, in addition to, the annual wrap fee described above. These fees will be described in the Manager's agreement with you and in their ADV Part 2A.

Item 5 Account Requirements and Types of Clients

We offer investment advisory services to clients including, but not limited to, individuals, non-profit organizations, endowments, foundations, charitable organizations, trusts, estates, pension and profit sharing plans, corporations,

and other business entities.

DiMeo Schneider will determine eligibility for participation in the wrap program, as well other DiMeo Schneider services, on a case by case basis.

Item 6 Portfolio Manager Selection and Evaluation

DiMeo Schneider is the sponsor and portfolio manager for the Program. DiMeo Schneider does not select other portfolio managers for the Program. We may engage unaffiliated Managers to manage a portion of your account; however the investment advisory services provided by these Managers are not included in the wrap fee program services; therefore, you will pay for these services separately and directly to the Managers. DiMeo Schneider will not collect any portion of the fee due to the Managers. It is our understanding that you will receive full disclosure of the Manager's services, fees and other relevant information at the inception of the relationship by way of the third-party Manager's disclosure document.

Identifying and Selecting Investment Managers and Vehicles

DiMeo Schneider currently has 38 professionals on our investment research teams. We have 32 individuals participating in Global Public Markets research and 18 participating in Global Private Markets research. This number includes members of the Research Team, certain Consultants and Performance Analysts', all of who contribute to the investment research process. This effort is lead and supervised by our Chief Investment Officer and the Investment Committee who make the final decision on recommended manager. It is that research effort that has led directly to our evolutionary improvements to the traditional asset allocation model, The Frontier Engineer™ and to our proprietary rebalancing overlay, The Portfolio Engineer™. The firm's Investment Committee consists of twelve members who are either senior investment consultants of DiMeo Schneider or senior members of the research staff.

DiMeo Schneider maintains a proprietary database of approximately over 1,000 managers that either our clients use and/or are under consideration for our recommended lists. We also screen a database of between approximately 6,000 to 9,000 private managers (depending on the market cycle timing) and approximately 8,000 hedge fund strategies, and approximately over 13,000 within global public markets (fixed income, equity and real assets) to maintain a "stable" of what we consider to be top candidates. We cover a wide range of asset classes and styles and do not charge any fees for managers to be included in our database. In addition to our proprietary database, we also purchase data from outside vendors.

We perform on-site visits, meet with managers in our office, and conduct due diligence telephone calls with managers. In these manager meetings, we typically emphasize areas that cannot be ascertained by quantitative performance analysis: organizational structure, product-specific information, infrastructure, philosophy-buy/sell discipline, portfolio construction, performance, trading, and compliance.

Although the asset classes for any particular client are dependent upon various factors including but not necessarily limited to the client's investment objectives and eligibility, DiMEO Schneider generally monitors the following asset classes for clients, and applicable material risks for each asset class are more fully described at the end of Item 8 of our ADV Part 2A:

Traditional Asset Classes

- Global Fixed Income
 - Cash
 - U.S. Treasury Inflation-Protected Securities
 - Investment Grade U.S. Nominal Bonds
 - Custom Liability LDI Bond (or derivative-based) Portfolios (for Pension Plans)
 - Foreign Bonds and Emerging Market Bonds
 - Non-Investment Grade (High Yield) U.S. Nominal Bonds
- Global Equities
 - U.S. Equities (large, mid & small cap)
 - Foreign Developed Equities
 - Emerging Market Equities

Alternative Asset Classes

- Real Assets
 - Real Estate (private and public)
 - Natural Resources
 - Timberland
 - Infrastructure
 - Other Niche Real Asset Opportunities
- Hedge Funds
 - Equity Hedge Strategies
 - Event-Driven Strategies
 - Macro Strategies
 - Relative Value Strategies
 - Multi-Strategy Funds
 - Funds of Underlying Hedge Funds
- Private Equity
 - Venture Capital Funds
 - Buyout Funds
 - Growth Equity Funds
 - Distressed/Special Situation Funds

- Private Credit
- Other Niche Private Market Strategies
- Funds of Underlying Private Equity Funds

However, even if we do not proactively recommend managers within these asset classes, we have identified a preferred list of investment managers within each listed above for the purpose of meeting the needs of clients who have a different view on the efficacy of each asset class within a diversified investment portfolio. Additionally, while there are certain asset classes we currently do not recommend, we are able to include these classes in models for our clients who want these asset classes.

Performance Monitoring

DiMeo Schneider prepares and distributes periodic investment performance data tailored to the needs of each client. Performance data is based upon custodial data for client accounts and information obtained and analyzed from a wide variety of sources, including information provided directly by investment managers and data services such as Morningstar and Lipper, amongst others. Although the information collected by DiMeo Schneider is believed to be reliable and DiMeo Schneider conducts due diligence on investment managers to assess the integrity and reliability of managers we recommend, DiMeo Schneider does not independently verify all information nor does DiMeo Schneider guarantee the accuracy or validity of such information. This process is described in more detail in Item 8 of our ADV Part 2A.

We distill extensive and often complex data into information which permits fiduciaries to quickly determine:

- Portfolio composition including asset allocation, sector and security exposure;
- Performance of the portfolio against plan;
- Performance of the managers/investment vehicles against appropriate benchmarks and peer universes;
- Style consistency of managers/strategies; and
- Portfolio allocation among products, customized Investment Performance Reviews, executive-summary reports which combine content and clarity so that the client can evaluate the fund's progress and manager performance.

Description of Advisory Services

After acquiring ORION Investment Advisors, L.L.C. in 2017 (IARD/CRD number 148966) and working to merge firm operations since that time, ORION terminated their registration with the SEC and officially became the Washington, D.C. area branch of DiMeo Schneider & Associates, L.L.C, an Illinois limited liability company. As a result of this merger, DiMeo Schneider now offers a Wrap Fee Program which was previously offered to clients of ORION. DiMeo Schneider is owned by DiMeo Schneider & Associates Holdings, L.L.C, a Delaware limited liability company. DSA is a joint venture with two distinct membership classes. Class A membership interest include our thirteen individual partners who collectively retain the exclusive right to manage the investment consulting practice including our Investment Committee and all investment client recommendations, as well as the day to day operations. The Class B membership interest is NFP Corp. ("NFP"). DiMeo Schneider has maintained a relationship with NFP since September, 2000. NFP provides technology and infrastructure support to DiMeo Schneider. Any conflicts are mitigated because NFP is not involved in the day to day management or operations of DiMeo Schneider. More information about DiMeo Schneider's affiliation with NFP is described in Item 9 below.

The Partners charged with running the day to day operations of DSA are Robert A. DiMeo, Michael S. Benoit, Matthew P. Porter, Douglas M. Balsam, Matthew R. Rice, Chad A. Tischer, James B. Modelski, Adam P. Newell, Jonathan A. Fellows, Brian P. Carlson, James M. Jensen, Jessica P. Ludwig and Bradford L. Long. There are no advisory services provided under the wrap program outside of those described in Item 4 of DiMeo Schneider's ADV Part 2A.

Types of Investments

We primarily offer advice on mutual funds, exchange traded funds, separately managed accounts and alternative investments. For more information on the risks involved with these types of investments please see Item 8 of the Form ADV Part 2A. Where suitable, we generally recommend no load or load-waived mutual funds. You may request that we refrain from investing in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

Performance-Based Fees and Side-by-Side Management

We do not accept performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account.

Investment Risks

Investing involves risk of loss that clients should be prepared to bear.

Though DiMeo Schneider's methods of analysis and investment strategies do not present uncommon risks, the Firm does not represent, warrant, or imply that its methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market declines.

In any investment strategy there is risk of loss that clients should be prepared to bear including loss of principal and the risk of not achieving investment objectives. Our work in helping clients develop an investment strategy typically extends beyond portfolio structure. It is common to analyze what we refer to as the "three levers":

- Revenue (Inflows)
- Spending (Outflows)
- Investment Returns (Target Return)

Each client's unique circumstances can lead to the recognition that one of the levers is more rigid or flexible. We believe it is very challenging to appropriately structure a portfolio without a clear understanding of each lever and its relative impact on the client. It is essential for an investor to thoroughly understand what risk really means and how to budget for that risk within an investment strategy. Some risks associated with investing are detailed below.

General Market and Economic Risks: Market and economic risks are a factor in any investment strategy. Volatility could disrupt our investment strategy, decrease the value of our clients' portfolios and adversely impact profitability.

Market Volatility: At various times in the past, volatile market conditions have had a dramatic effect on the value of investments, both public and private. In addition, terrorist attacks, other acts of violence or war, health epidemics or pandemics, natural hazards, and/or force majeure may affect the operations and profitability of client accounts. Such events also could cause consumer confidence and spending to decrease or result in increased volatility in the U.S. and worldwide financial markets and economy. Any of these occurrences could have a significant impact on the return of a client's investments.

Liquidity Risk: Some investments are subject to limited liquidity. This means clients may not be able to buy or sell securities quickly enough to prevent or minimize a loss. In addition clients may be subject to high costs or losses due to wide bid-ask spreads or large price movements. In times of crisis, liquidity risk can even affect investments generally deemed "safe" including money market funds and similar investments.

Interest Rates Risk: the value of investments in client portfolios may be impacted by changes in the level of interest rates, the spread between rates, the shape of the yield curve, and other rate related movements. These changes can be unpredictable and may cause losses.

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.

Private Investments Risks: Private investments including private equity, private real estate, venture capital, hedge funds and similar offerings (collectively, "Private Investments") are subject to legal or other restrictions on transfer and a liquid market will likely not exist for such investments. Investors will likely be unable to sell any Private Investments when desired or to realize previously anticipated fair value when sold. Calculating the fair market value of Private Investments is difficult and the expense of owning Private Investments is generally higher compared to public offerings.

These Private Investments are subject to a variety of risks and their value generally will fluctuate with, among other things, the financial condition of the obligors on or issuers of the assets, general economic conditions, the condition of certain financial markets, political events and developments or trends in any particular industry. With respect to synthetic securities, value will likely also be affected by the financial condition of the related synthetic security counterparties and of the obligors or issuers of the underlying obligations. Finally, Private Investments are subject to lower public reporting requirements and are less transparent than traditional investments such as ETFs or mutual funds.

These Private Investments, in certain cases depending on the investment, will likely use certain strategies, investment techniques and financial instruments that are considered aggressive, including but not limited to, investments in derivatives, short positions and leverage. Such techniques, if implemented by a Private Investment for the client, will cause dramatic changes (losses or gains) in a Private Investment.

Certain private investments recommended by DiMeo Schneider are offered through private funds and are exempt from registration under the Securities Act of 1933 ("33 Act") pursuant to Regulation D. Additionally, these private investments will typically rely on the "exclusion" from the definition of "investment company" for certain "private" investment companies provided by the Investment Company Act of 1940 ("ICA"). As a result, these private investments have not registered and are not subject to regulation under the ICA or 33 Act, and investors are not afforded the protections that such registration and regulation might provide.

ETFs and Mutual Fund Risk: The ETFs and mutual funds utilized by DiMeo Schneider may include funds invested in domestic and international equities, including real estate investment trusts (REITs), corporate and government fixed income securities and commodities. Equity securities can include large capitalization, medium capitalization and small capitalization stocks. ETF and mutual fund shares invested in fixed income securities are subject to the same interest rate, inflation and credit risks associated with the underlying bond holdings.

Among the higher-risk ETFs used in DiMeo Schneider's investment strategies are small-capitalization stock funds, foreign developed and emerging markets funds, and funds that invest in commodities or other real assets. Conservative fixed income securities have lower risk of loss of principal, but most bonds present the risk of loss of purchasing power through lower expected return. This risk is greatest for longer-term bonds.

Equity Securities Risk: Equity securities (common, convertible preferred stocks and other securities whose values are tied to the price of stocks, such as rights, warrants and convertible debt securities) could decline in value if the issuer's financial condition declines or in response to overall market and economic conditions. A fund's principal market segment(s), such as large cap, mid cap or small cap stocks, or growth or value stocks, may underperform other market segments or the equity markets as a whole. Investments in smaller companies and mid-size companies may involve greater risk and price volatility than investments in larger, more mature companies.

Options Risk: Investing in options can provide a greater potential for profit or loss than an equivalent investment in the underlying asset. The value of an option may decline because of a change in the value of the underlying asset relative to the strike price, the passage of time, changes in the market's perception as to the future price behavior of the underlying asset, or any combination thereof. DiMeo Schneider does not actively recommend options or pursue option strategies for its clients.

Risks Associated with Non-U.S. Investments: DiMeo Schneider may make investments outside the U.S. Such investments involve risks and special considerations some of which are not typically associated with U.S. investments. These include political risks, economic risks, legal risks, foreign currency and exchange risks,

accounting and tax risk, restrictions on repatriation of capital and profits and different tax requirements. Differences in tax and accounting standards and difficulties in obtaining information about foreign companies can negatively affect investment decisions. Unlike more established markets, emerging markets may have governments that are less stable, markets that are less liquid and economies that are less developed.

Government and Municipal Securities Risk: U.S. Government securities are subject to interest rate and inflation risks. Not all U.S. Government securities are backed by the full faith and credit of the U.S. Government. Certain securities issued by agencies and instrumentalities of the U.S. Government are only insured or guaranteed by the issuing agency or instrumentality. As a result, there is a risk that these entities will default on a financial obligation.

Municipal securities are subject to various risks based on factors such as economic and regulatory developments, changes or proposed changes in the federal and state tax structure, deregulation, court rulings and other factors. Repayment of municipal securities depends on the ability of the issuer or project backing such securities to generate taxes or revenues. There is a risk the interest on an otherwise tax-exempt municipal security may be subject to federal income tax.

Reliance on Management and Financial Reporting: Many of the investment strategies implemented or recommended by DiMeo Schneider rely on financial information made available by issuers or third-party managers. DiMeo Schneider will not necessarily have the ability to independently verify the financial information disseminated by the issuers or third-party manager and will be dependent upon the integrity of both the management of these issuers and the financial reporting process in general. Recent events have demonstrated the material losses that investors can incur as a result of corporate mismanagement, fraud, and accounting irregularities.

Cybersecurity: DiMeo Schneider's information and technology systems may be vulnerable to damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches, usage errors by its professionals, power outages and catastrophic events such as fires, tornadoes, floods, hurricanes and earthquakes. Although DiMeo Schneider has implemented various measures to protect the confidentiality of its internal data and to manage risks relating to these types of events, if these systems are compromised, become inoperable for extended periods of time or cease to function properly, DiMeo Schneider will likely have to make a significant investment to fix or replace them. The failure of these systems and/or of disaster recovery plans for any reason could cause significant interruptions in DiMeo Schneider's operations and result in a failure to maintain the security, confidentiality or privacy of sensitive data, including personal information relating to clients. Such a failure could harm DiMeo Schneider's reputation or subject it to legal claims and otherwise affect their business and financial performance. DiMeo Schneider will seek to notify affected clients of any known cybersecurity incident that will likely pose a substantial risk of exposing confidential personal data about such clients to unintended parties.

The risk of loss described herein should not be considered to be an exhaustive list of all the risks that clients should consider.

Voting Client Securities

Generally, we will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice



regarding corporate actions and the exercise of your proxy voting rights. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. In certain instances, third-party managers selected to manage a portion of the client's assets may vote client proxies related to those assets. Please review the third-party Manager's ADV Part 2A for information on the Manager's proxy voting policies and procedures.

Item 7 Client Information Provided to Portfolio Managers

This section does not generally apply to DiMeo Schneider because we are the sponsor and portfolio manager to the Program. While we do not provide specific client information to any third-party investment managers, the client's custodian may share this information.

Item 8 Client Contact with Portfolio Managers

This section does not generally apply to our firm because we are the sponsor and the portfolio manager to the Program; however, if a client desires to speak with a third-party Manager we will facilitate a conference call or meeting with the Manager and the client.

Item 9 Additional Information

Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of DiMeo Schneider or the integrity of DiMeo Schneider's management. DiMeo Schneider has no information applicable to this Item.

Other Financial Industry Activities and Affiliations

As mentioned in item 4 of the ADV Part 2A, DiMeo Schneider is a partner with NFP. NFP is a provider of benefits, insurance and wealth management services. NFP owns 100+ affiliates, all of whom may refer clients to DiMeo Schneider. Some of these NFP affiliates are registered as investment advisers and/or broker-dealers. Currently, DiMeo Schneider receives referrals from Lenox Advisors, Inc., an affiliate of DiMeo Schneider and ultimately owned by NFP. On or around April 1, 2020, Fiduciary Investment Advisors, LLC ("FIA") will also become an affiliate DiMeo Schneider. At that time FIA will also become ultimately owned by NFP. DiMeo Schneider will also receive referrals from FIA until the final phase of the deal closes later in 2020. However, DiMeo Schneider does not consider these referral arrangements to be material to its advisory business or its clients. More information about NFP may be found at www.nfp.com.

Description of Our Code of Ethics

DiMeo Schneider has a Code of Ethics for all supervised persons of the firm describing its high standard of



business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the prohibition on insider trading and personal securities trading procedures, among other things. All persons at DiMeo Schneider must acknowledge their understanding of and compliance with the Code of Ethics on an annual basis.

DiMeo Schneider anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which DiMeo Schneider has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which DiMeo Schneider supervised persons have a position of interest. DiMeo Schneider's supervised persons are required to follow the Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of DiMeo Schneider may trade for their own accounts in securities which are recommended to and/or purchased for DiMeo Schneider clients. The Code of Ethics is designed to help assure that the personal securities transactions, activities and interests of the employees of DiMeo Schneider will not interfere with making decisions in the best interest of advisory clients. Employee trading is continually monitored under the Code of Ethics. Clients or prospective clients may request a copy of the firm's Code of Ethics by contacting the Compliance Department at compliance@dimeoschneider.com.

Reviews of Accounts

Client accounts are reviewed by a Consultant of DiMeo Schneider, generally a Partner and/or senior professional on a periodic basis (typically on a quarterly basis), or when changes in client circumstances or market conditions dictate. The quarterly reviews are usually done in person or over the phone, depending upon the preferences of the client. Client service teams typically include a Partner and/or Senior Consultant, a co-Consultant, Analyst, and Service Administrator. Senior Consultants may do partial work on a number of clients and we monitor the workload of each Senior Consultant to ensure client satisfaction.

Typically, regular reports on client accounts are prepared and provided to clients on a quarterly basis. Generally these reports include information relating to the composition and market value of the client's portfolio, including the amount of any gains and losses, as well as the performance comparison information to industry indices and other relevant benchmarks.

Client Referrals and Other Compensation

DiMeo Schneider compensates persons for client referrals in compliance with Rule 206(4)-3 of the Investment Advisers Act of 1940. In addition, DiMeo Schneider receives referrals from professionals (e.g., attorneys and accountants), or introducing broker-dealers and their registered representatives. DiMeo Schneider may refer its clients to the professionals who refer clients to DSA, but DSA will not receive any fees for such referrals.

Currently, DiMeo Schneider receives referrals from Lenox Advisors, Inc., an affiliate of DiMeo Schneider and ultimately owned by NFP. On or around April 1, 2020, Fiduciary Investment Advisors, LLC ("FIA") will also become an affiliate DiMeo Schneider. At that time, FIA will also become ultimately owned by NFP. DiMeo Schneider will also receive referrals from FIA until the final phase of the deal closes later in 2020.

DiMeo Schneider has an employee referral program for client referrals for certain eligible employees. For business that an employee refers and is successfully landed by DiMeo Schneider, an employee will receive compensation in accordance to DiMeo Schneider's written employee referral program in effect at the time of the client referral.

Custody

DiMeo Schneider generally does not take physical custody of assets, but under SEC guidance, we are deemed to have custody as a result of standing letters of authorization ("SLOA") allowing us to disburse funds on the clients' behalf or our ability to debit advisory fees from client accounts. Under this guidance, advisers relying on SLOAs who make certain disbursements on behalf of the client may avoid obtaining a surprise asset verification if each client provides written instructions to their custodian regarding specific transactions that the client authorizes the custodian to disburse funds in accordance with their SLOA upon the request of DiMeo Schneider. Each custodian is responsible for verifying these instructions when executing each transaction and confirm these instructions annually with DiMeo Schneider. DiMeo Schneider has no ability to change any routing information regarding such disbursements and the client can terminate the relationship and the SLOA at any time.

All client assets are held at qualified custodians and DiMeo Schneider engages an independent public accountant to conduct an annual surprise examination on those accounts requiring such an audit based on the nature of the custody we are deemed to have for each account. Please see Item 9 on Form ADV, Part 1 for additional custody disclosures.

How We Recommend Custodians/Broker-Dealers

Each client will receive a recommendation based on DiMeo Schneider's understanding of their goals, objectives, and expected activity. The primary factors that determine DiMeo Schneider's recommendation of a custodian/broker-dealer to a client are in no specific order:

- Combination of transaction execution services along with asset custody services (generally without a separate fee for custody);
- Capability to execute, clear and settle trades (buy and sell securities for your account);
- Capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
- Breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.);
- Availability of investment research and tools that assist us in making investment decisions quality of services;
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them;
- Reputation, financial strength and stability of the provider;
- Their prior service to us and our other clients;
- Availability of other products and services that benefit us, as discussed below (see "Products and Services Available to Us from Schwab and TradePMR")

- Banking/Lending Services; and
- Reporting capabilities.

DiMEO Schneider is not affiliated with our recommended custodians/broker-dealers. These custodians/broker-dealers will hold your assets in a brokerage account and buy and sell securities when we, or you, instruct them to. While we recommend that you use a specific custodian/broker-dealer, you will decide whether to do so and will open your account by entering into an account agreement directly with the selected custodian/broker-dealer. We do not open the account for you, although we may assist you in doing so. Your account is maintained at one of our qualified custodians/broker-dealer, and the custodian/broker-dealer will route orders for execution in your account as described below (see "*Your Brokerage and Custody Costs*").

Your Brokerage and Custody Costs

For our clients that maintain their accounts with one of our recommended custodians, there is generally no separate charge for custody services. Other fees for processing and maintenance may apply and a detailed schedule is available upon request.

We believe that our selection of preferred custodians and brokers, Schwab and TradePMR, is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of services provided by Schwab and TradePMR and not services that benefit only us.

Trade Execution

We believe that Charles Schwab ("Schwab"), Fidelity, TD Ameritrade and Trade-PMR, Inc. ("TradePMR") provide quality execution services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided, including the firm's reputation, execution capabilities, commission rates, responsiveness to our clients and our firm, and products and services that benefit us. In recognition of the value of research services and additional brokerage products and services, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

Although we will direct your custodian to execute all trades for your account, the custodian/broker-dealer or third-party manager may choose to use another broker-dealer to execute the trade (also known as a step-out transaction or trade-away), in doing so, other commissions or mark-ups/mark-downs may apply and will generally be netted into the price you receive for the trade. These commission, mark-ups/mark-downs will not be listed separately on your custodial statement or trade confirmation. We do not have any control over whether or not the selected custodian/broker-dealer/third-party manager steps-out a trade in your account.

Products and Services Available to Us from Schwab and TradePMR

Schwab and TradePMR provide us and our clients with access to its institutional brokerage, trading, custody, reporting, and related services many of which are not typically available to retail customers. Schwab and TradePMR also make available various support services as described above. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. Schwab and TradePMR's support services generally are available on an unsolicited basis (we do not have to request them) and at no charge to us.

Services That Benefit You

Services provided by Schwab and TradePMR include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

Services That May Not Directly Benefit You

Schwab and TradePMR also make available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. Custodians also make available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting services that generally benefit only us

Schwab and TradePMR also offer other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

These services may be provided directly by Schwab and TradePMR, or they will arrange for third-party vendors to provide the services to us. Schwab and TradePMR may also discount or waive their fees for some of these services or pay all or a part of a third-party's fees. Schwab and TradePMR will also provide us with other benefits, such as occasional business entertainment of our personnel.

Research and Soft Dollar Benefits

We do not receive research products or services in connection with our client's securities transactions, also known as soft dollars.

Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about DiMeo Schneider's financial condition. DiMeo Schneider has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding. DiMeo Schneider does require the prepayment of more than \$1,200 in fees six or more months in advance.