



**MERIDIAN**  
WEALTH MANAGEMENT, LLC

250 West Main Street, Suite 3150  
Lexington, KY 40507  
Phone: (859) 543-4516  
Fax: (859) 543-4523  
[www.meridianwealthllc.com](http://www.meridianwealthllc.com)

**Form ADV Appendix 1 – Wrap Fee Program Brochure**

**March 25, 2020**

This Wrap Fee Brochure provides information about the qualifications and business practices of Meridian Wealth Management, LLC (Meridian, Firm, we, or us). If you have any questions about the contents of this brochure, please contact us at (859) 543-4516.

Meridian Wealth Management, LLC, is an investment adviser registered with the Securities and Exchange Commission (SEC). An investment adviser means any person who, for compensation, engages in the business of advising others, either directly or through publications or writings, as to the value of securities or as to the advisability of investing in, purchasing, or selling securities, or who, for compensation and as part of regular business, issues or promulgates analyses or reports concerning securities. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

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 Meridian Wealth Management, LLC, is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by entering the firm's CRD number 151523 or the firm's name.

## **Item 2 - Material Changes**

Since the last annual filing on March 2019, the following material changes have been made to our Brochure:

- Fee information was updated related to Portfolio Management Services. See Item 4 for more information;

Under SEC Rules, we will deliver to you a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. All such information will be provided to Clients at no cost.

A complete copy of our updated Brochure may be requested at no cost by contacting us at (859) 543-4516. Additional information about Meridian Wealth Management, LLC (Meridian) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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#### **Item 4 – Services, Fees and Compensation**

##### ***Advisory Services***

Meridian is a Registered Investment Advisor (RIA) based in Lexington, Kentucky. We are a limited liability company (LLC), formed under the laws of the State of Kentucky. We have been providing investment advisory services since 2009. Gregory Wayne Couch is the principal owner of Meridian.

Currently, we offer the following investment advisory Wrap Program, personalized to each client:

- Meridian Strategic Wrap Program (program)

The following paragraphs describe the services we provide and what we charge for those services. The term Investment Adviser Representative (IAR), as used in this Brochure, refers to an individual from Meridian, who is an officer, employee or individual providing investment advice on behalf of Meridian.

##### ***Meridian Strategic Wrap Program***

Portfolio management refers to the management of money, including investments. Assets are held in what is called a portfolio. Determining the types and quantities of securities to hold in a portfolio is referred to as portfolio management.

Meridian offers discretionary and non-discretionary portfolio management services with this program to our clients and prospective clients. Discretionary portfolio management means we will make investment decisions and place buy or sell orders in your account without contacting you. These decisions would be made based upon your stated investment objectives. Non-discretionary portfolio management means we will contact you before a trading decision is implemented.

Our investment advice is tailored to meet our clients' needs and investment objectives. If you decide to hire Meridian to manage your portfolio, we will gather your financial information, assess your goals and assess how much risk we recommend that would be appropriate for your investments. The information we gather will help us implement an asset allocation strategy that will be specific to your goals whether we are actively investing for you or simply providing you with advice.

Meridian mainly uses equity securities, exchange-traded funds, mutual funds, corporate securities, municipal securities, U.S. government securities in its portfolio management programs. We may also recommend that clients invest in various limited partnerships.

When we construct clients' investment portfolios, we will monitor the portfolio's performance on an ongoing basis and rebalance the portfolio as we feel necessary, as changes occur in market conditions or financial circumstances, or both.

As outlined above, discretionary portfolio management services mean that once the portfolio has been agreed upon, the ongoing supervision and management of the portfolio will be Meridian's responsibility. This authority is granted to us by you in a written agreement. This authority allows Meridian to decide on specific securities, the quantity of the securities and placing buy or sell orders for your account without obtaining your approval for each transaction. This type of authorization is done using either the investment advisory agreement you sign with Meridian, a limited power of attorney agreement, or trading authorization forms. You may limit this authority by setting a limit on the type of securities that can be purchased for your account. Limitations will be outlined in writing.

The non-discretionary portfolio management service means, as outlined above that we must obtain your approval before placing any transactions in your account.

Clients should consider whether the fees they pay under the program are more or less than they would pay if they obtained investment advisory, brokerage, and custodial services separately (an "unbundled" arrangement). When making their decision to participate in a program, Clients or prospective Clients should consider the many economic incentives that Meridian (including the IAR) has that may influence its decision to recommend these Programs (or not to recommend other programs or investment alternatives).

### ***Delegation to Sub-Advisors***

For those of our clients who hire us for discretionary portfolio management services and who have signed an agreement with us to this effect, you should be aware that we may use one or more sub-advisors to manage or assist in managing a portion of your account. All sub-advisors that we retain or recommend to clients must be registered as investment advisers with either the SEC or with the appropriate state authority (ies). We will continuously monitor the performance of any accounts managed by the sub-adviser and in a discretionary engagement will have authority to hire or fire the sub-adviser at our discretion. The sub-advisor(s) may use one or more of their model portfolios to manage your account.

As of March 3, 2020, we managed \$694,001,453 in client assets on a discretionary basis, \$4,078,053 in non-discretionary assets, as well as having \$5,340,787 in assets under advisement.

### ***Fees and Compensation***

If you decide to engage Meridian for portfolio management services in this wrap program, we will charge an annual fee based on a percentage of the market value of the assets being managed. Our fee for portfolio management services is typically an annual rate of 0.95% -1.15% for assets under management. Since this fee is negotiable, based on the complexity of account, the level of service, etc., the exact fee to be charged to the client will be clearly stated in the advisory agreement signed by the client and Meridian.

Meridian will bill you directly for payment of our fees, or the fees will be deducted from your investment account automatically with your authorization. Fees are calculated and billed monthly or quarterly in advance and are based on the value of your portfolio at the end of the preceding month or quarter. If you choose to be billed directly, payment in full is expected upon invoice presentation. You will receive an invoice, either way, identifying the amount of transaction charges within your account during the previous billing period and the calculation used to identify the exact amount your account is billed.

If you choose to have Meridian's fee deducted directly from your account, you must provide authorization. The qualified custodian holding your funds and securities will send you an account statement, at least quarterly that will detail account activity. Please review each statement for accuracy.

Our investment management fee includes brokerage commissions, transaction fees. Other related costs and expenses will be incurred by the client. Please see Item 9 – Brokerage Practices for further information on additional costs.

At the inception of investment management services, the initial fees will be calculated on a pro-rata basis if for a partial month or quarter. The Advisory Agreement between Meridian and the client will continue in effect until either party terminates the Agreement by the terms of the Agreement. Meridian's fee will be pro-rata through the date of, and any remaining balance shall be charged or refunded to the client, as appropriate, promptly.

Although Meridian believes its fees are reasonable in light of the services provided, clients should be aware that such fees may be more or less than the fees and commissions associated with investment advisory and brokerage services purchased separately. The comparison is dependent upon a number of factors, including the size of the account under management and any negotiated fee arrangements with respect to the account. An investor should consider these factors prior to opening an Advisory Account with Meridian. Clients should consider the value of the additional consulting services when making such comparisons. The combination of custodial, consulting, and brokerage services may not be available separately or may require multiple accounts, documentation, and fees. All fees described herein are subject to negotiation depending on a range of factors including, but not limited to, account size and overall range of services requested.

***Additional Fees and Expenses*** Wrap fees do not cover charges imposed by third-parties for investments held in the account, such as contingent deferred sales charges or 12(b)-1 trails on mutual funds. In addition, each mutual fund or third party investment manager charges asset management fees, which are in addition to the advisory fees charged by the firm. The fees charged by such funds or managers are disclosed in each fund's prospectus or Manager's ADV Part 2A. Accounts may require a minimum advisory fee or quarterly maintenance fee that will be detailed in the applicable advisory agreement. The Management Fee also does not cover fees and charges in connection with: debit balances; margin interest; odd-lot differentials; IRA fees; transfer taxes; exchange fees; wire transfers; extensions; non-sufficient funds; mailgrams; legal transfers; bank wires; postage; costs associated with exchanging foreign currencies; and SEC fees or other fees or taxes required by law.

Some mutual funds within this program pay 12(b)-1 service fees (normally 0.25% per year) to the Custodian [or Manager]. The mutual funds the Firm could purchase or recommend offer a variety of share classes, including some that do not charge 12(b)-1 fees and are, therefore, less expensive. These fee arrangements will be disclosed upon request of a client and are available in the applicable fund's prospectus.

There are instances in which the Meridian would recommend a mutual fund that carries a 12(b)-1 fee, even when a lower-cost share class is available for the same fund. For example, a lower-cost class share may not be available to Meridian due to investment minimums. In other cases, mutual funds charging 12(b)-1 fees are transferred into Meridian. In which case the Firm may recommend the client holds the existing share class, instead of selling the fund and buying a lower-cost share, which could result in a tax liability. In addition, some mutual funds charge 12(b)-1 fees, but no transaction fees, while other share classes in the same fund family do not charge 12(b)-1 fees, but do charge transaction fees. Mutual funds charging 12(b)-1 fees will be recommended when the overall cost is seen as a benefit to the client if the anticipated transaction fees exceed the anticipated 12(b)-1 fees. When recommending a particular mutual fund share classes, the different available share classes are compared and reviewed along with the anticipated investment timeframe, potential tax consequences, future anticipated transactions and other costs to determine the best selection for the client at that time. Meridian does not receive any part of the fees charged by Mutual Funds.

### ***Margin***

IARs trade on margin for client's accounts, when consistent with the client's suitability profile and risk tolerance or at the client's directive. This could result in a high portfolio turnover ratio and higher transaction charges in accounts with such charges. Additionally, the use of margin results in interest charges as well as all other fees and expenses associated with the security or account involved.

Fees are debited directly from client accounts and are calculated using the total assets in the account as shown on the client custodial statement, including any assets purchased on margin. If there is a net debit cash balance in the account as a result of using margin, the cash balance will be excluded from the fee calculation. Net positive cash balances in type 1 (cash account) and type 2 (margin account) are included in the fee calculation.

The Chief Compliance Officer of Meridian regularly reviews client transactions to ensure that Meridian is acting in the best interest of its clients.

All conflicts of interest between you and Meridian and the IARs of Meridian are outlined in this Disclosure Brochure. If additional conflicts arise in the future, we will notify you in writing or supply you with an updated Disclosure Brochure.

### **Item 5 - Types of Clients**

We offer investment advisory services to individuals, pension and profit sharing plan participants, trusts, estates, charitable organizations, corporations, municipalities and other business entities.

### **Item 6 – Portfolio Manager Selection and Evaluation**

#### ***Advisory Services***

#### ***Performance-Based Fees and Side-By-Side Management***

We and our IARs do not accept performance-based fees and do not manage performance based and non-performance-based accounts on a side-by-side basis.

#### ***Methods of Analysis, Investment Strategies and Risk of Loss***

The following are different methods of analysis that we may use when providing you with investment advice:

- Fundamental analysis is a technique that attempts to determine a security's value by focusing on underlying factors that affect a company's actual business and its future prospects. The term refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.
- Technical analysis is a technique that relies on the assumption that current market data (such as charts of price, volume, and open interest) can help predict future market trends, at least in the short term. It assumes that market psychology influences trading and can predict when stocks will rise or fall.

We may use one or more of the following investment strategies when advising you on investments:

- Long-Term Purchases are securities held for over a year.
- Short-Term Purchases are securities held for less than a year.
- Covered Call Options is an option strategy in which an investor writes an option contract while at the same time owning an equivalent number of shares of the underlying stock.

The investment advice provided along with the strategies suggested by Meridian will vary depending on each client's specific financial situation and goals. This brief statement does not disclose all of the risks and other significant aspects of investing in financial markets. In light of the risks, you should fully understand the nature of the contractual relationship(s) into which you are entering and the extent of your exposure to risk. Certain investing strategies may not be suitable for many members of the public. You should carefully consider whether the strategies employed will be appropriate for you in light of your experience, objectives, financial resources and other relevant circumstances.

### **General Investment Risk**

All investments come with the risk of losing money. Investing involves substantial risks, including possible loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk, and you should familiarize yourself with the risks involved in the particular market instruments you intend to invest in.

### **Loss of Value**

There can be no assurance that a specific investment will achieve its investment objectives, and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested.

Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and government, economic or monetary policies.

### **Interest Rate Risk**

Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. The prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer-term debt securities are usually more sensitive to interest rate changes.

### **Credit Risk**

Investments in bonds and other fixed-income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems, and their value may be more volatile.

### **Foreign Exchange Risk**

Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of

payments, governmental intervention, speculation and other economic and political conditions. If the currency in which a security is denominated appreciates against the US Dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

### ***Futures and Options Risk***

Options and futures contracts on securities carry a high degree of risk. The amount of the initial margin is small relative to the value of the futures contract so that transactions are leveraged or geared. A relatively small market movement will have a proportionately larger impact that may work for or against the investor. The placing of certain orders which are intended to limit losses to certain amounts may not be effective because market conditions may make it impossible to execute such orders. Transactions in options also carry a high degree of risk. Selling (i.e. writing or granting) an option entails considerably greater risk than purchasing options. Although the premium received by the seller is fixed, the seller may sustain a loss more than that amount.

The seller will also be exposed to the risk of the purchaser exercising the option, and the seller will be obliged to settle the option in cash or to acquire or deliver the underlying investment. If the option is "covered" by the seller holding a corresponding position in the underlying investment or future on another option, the risk may be reduced.

### ***Voting Client Securities***

Meridian does not vote proxies. Questions about proxies may be made via the contact information on the cover page.

## **Item 7 – Client Information Provided to Portfolio Managers**

Meridian may act as both your registered investment adviser and your portfolio manager. In those instances, your Portfolio Manager has the same access to your financial information as Meridian. Your financial information includes, among other things, information on your income, net worth, and investment objectives. Your Portfolio Manager uses this information to determine an appropriate asset allocation for you and to manage your investments. When you update your information with Meridian, your Portfolio Manager will have immediate access to the same updated information.

Meridian may outsource its portfolio management by using outside portfolio managers. The third party manager generally requires clients to complete an investment profile questionnaire upon account opening. Clients should inform Meridian and the third party money manager (if applicable) in writing of any material changes in the Client's investment objectives that might affect the manner in which Client's assets should be invested.

The Client may contact Meridian during normal business hours to consult with their adviser concerning the management of the Client's Account.

## **Item 8 – Client Contact with Portfolio Managers**

You may communicate with Portfolio Managers directly. Consultations beyond normal business hours may require additional negotiated fees.

## **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 us or the integrity of our management. There is no history of material legal or disciplinary events by Meridian or our management persons.

### ***Other Financial Industry Activities and Affiliations***

Gregory Couch, Managing Member, and other IARs of Meridian are licensed insurance agents and can effect transactions in insurance products for their clients and earn commissions for these activities. Meridian expects clients to whom it offers advisory services may also be clients for whom these individuals act as insurance agents. Clients are instructed that the fees paid to Meridian for advisory services are separate and distinct from the commissions earned by its IARs for placing the client in insurance products. Clients to whom the Meridian offers advisory services are informed that they are



under no obligation to use the Firm's IARs for insurance services and may use the insurance brokerage firm and agent of their choosing.

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

### ***Description of Our Code of Ethics***

Meridian has adopted a Code of Ethics (Code) to address investment advisory conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes Meridian's policies and procedures developed to protect clients' interests about the following topics:

- The duty at all times to place the interests of clients first.
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the Code.
- The responsibility to avoid any actual or potential conflict of interest or misuse of an employee's position of trust and responsibility.
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential; and
- The principle that independence in the investment decision-making process is paramount.

A copy of Meridian's Code is available upon request to the Chief Compliance Officer at Meridian's principal office address.

### ***Personal Trading Practices***

At times, Meridian and its IARs may take positions in the same securities as clients, which may pose a conflict of interest with clients. Meridian prohibits any employee trading that would be unfair to a client. Should a conflict occur because of materiality (i.e. a thinly traded stock), the disclosure will be made to the client(s) at the time of trading. Incidental trading not deemed to be a conflict (i.e. a purchase or sale which is minimal in relation to the total outstanding value, and as such would have negligible effect on the market price), would not be disclosed at the time of trading.

## **Review of Accounts**

### ***Portfolio Management Account Reviews***

Meridian monitors the individual investments within Meridian's portfolio management program continuously. Client portfolio performance is reviewed, at a minimum, on a quarterly basis. Meridian offers portfolio management clients an in-person portfolio review meeting on an annual basis. Since a financial plan represents a snapshot in time, ongoing reviews are not automatically conducted. However, we recommend clients engage us on an annual basis to update the financial plan to account for changes in a clients' financial situation.

The account reviews are performed by the clients' IAR. Meridian's Chief Compliance Officer and other designated compliance staff will also monitor the managed portfolios periodically.

### ***Reports***

Clients will receive statements directly from their account custodian(s) on at least a quarterly basis. Additionally, Meridian may provide performance reports at its sole discretion.

### ***Client Referrals and Other Compensation***

We do not receive economic benefits from third parties in exchange for providing investment advice or other advisory services to our clients.

Meridian, in some instances, may compensate third-party solicitors for client referrals. The solicitor's agreements entered into by Meridian comply with Rule 206(4)-3 under the Investment Advisers Act of 1940. Currently Meridian has agreements with SmartAsset, and Blue Ridge Insurance Group. Additional solicitor agreements may be initiated, or existing ones terminated at any time. Compensation for Blue Ridge Insurance Group will be based on a percent of referred clients' account value managed by Meridian. Compensation for SmartAsset is a flat fee. Such fees are paid pursuant to a written agreement between Meridian and the solicitor. A client who is solicited will receive an additional disclosure

document specifically describing the arrangement and the compensation paid to the solicitor. Solicitor's fees will be based on Meridian's normal fee schedule; clients will not be charged any additional fees or expenses as a result of the referral.

### ***Financial Information***

We are required in this Item to provide you with certain financial information or disclosures about Meridian's financial condition. Meridian 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.

### ***Brokerage Practices***

Meridian does not maintain custody of client assets. Instead, we require all client assets be maintained in an account at a non-affiliated qualified custodian or broker-dealer.

While we recommend that you use Charles Schwab & Company and you will open your investment account by entering into an account agreement directly with the qualified custodian. We do not open accounts for you, although we can assist you in doing so with Charles Schwab & Company to custody your assets.

### ***Research and Other Soft Dollar Benefits***

The custodians make products and services available to Meridian that benefit the Firm but may not directly benefit its clients' accounts. Many of these products and services are used to service all or a substantial number of Meridian accounts. Some of these products and services provided includes software and other technology that provides access to client account data (such as trade confirmations and account statements); provides research, pricing and other market data; facilitates payment of fees from clients' accounts; and assists with back-office functions, recordkeeping and client reporting. When client brokerage commissions are used to obtain research or other products or services, Meridian receives a benefit because we do not have to produce or pay for the research, products or services. As a result of these services provided, commissions may be higher than those charged by other broker-dealers. Soft dollar benefits are used to service all client accounts; they are not used exclusively for the accounts that generated the soft dollar benefits. There is no effort to allocate soft dollar benefits to clients in proportion to the amount of soft dollar benefits generated by each client. Within the last fiscal year, Meridian used client brokerage commissions to acquire the products and services listed above under "Soft Dollar Benefits."

Meridian understands its duty for best execution and considers all factors in making recommendations to clients. These research services may be useful in servicing all Meridian clients, and may not be used in connection with any particular account that may have paid compensation to the firm providing such services. While Meridian may not always obtain the lowest commission rate, Meridian believes the rate is reasonable in relation to the value of the brokerage and research services provided.

### ***Brokerage for Client Referrals***

Meridian does not receive an economic benefit by anyone other than the client for providing investment advice and other advisory services.

Meridian periodically receives client referrals from an independent source, SmartAsset. A flat referral fee is paid to SmartAsset for referring the client to the firm. Advisory fees of referred clients are based on Meridian's normal fee schedule; clients will not be charged any additional fees or expenses as a result of the referral payment.

### ***Directed Brokerage***

The client may direct brokerage transactions to a specified broker-dealer other than the firm recommended by Meridian. It is up to the client to negotiate the commission rate, as Meridian will not. The client may not be able to negotiate the most competitive rate. As a result, the client may pay more than the rate available through the broker-dealer used by Meridian. In client directed brokerage arrangements, the client may not be able to participate in aggregated (blocked) trades, which may help

reduce the cost of execution. Where the client does not otherwise designate a broker-dealer, Meridian recommends a broker-dealer with competitive commission rates.

### ***Trade Aggregation***

While individual advice is provided to each client, when consistent with our duty for best execution, we will aggregate client orders. Meridian recommends that you use Pershing LLC, Charles Schwab & Company or TD Ameritrade Institutional as the custodian for your accounts. Only client accounts in the custody of one of the three recommended custodians would have the opportunity to participate in aggregated securities transactions. No client within the block trade will be favored over any other client, and each client will participate in an aggregated order at the average share price and receive the same commission rate from the custodian where their account is held. Block trades done on the same day at different custodian may not get the same price or commission rate. Meridian and its IARs may participate in block trades with clients and may also participate on a pro rata basis for partial fills, but only after the determination has been made that clients will receive fair and equitable treatment.

### ***Investment Discretion***

Meridian offers Portfolio Management Services to its advisory clients on both a discretionary and non-discretionary basis. Meridian will manage client accounts on a discretionary basis if the client has granted discretionary authority in the client advisory agreement. Discretionary authority extends to the type and amount of securities to be bought and sold and does not require advance client approval. However, Meridian does not have the ability to withdraw funds or securities from the clients' account. In a non-discretionary account, an IAR of Meridian recommends the purchase or sale of securities for review and approval by their clients. Meridian will only purchase or sell securities that have been approved by clients in advance.

You may limit this authority if you wish by, for example, setting a limit on the type of securities that can be purchased for your account. Simply provide us with your restrictions or guidelines in writing. Please refer to the "Services, Fees and Compensation" section in this Brochure for more information on our discretionary management services.

### **Miscellaneous**

#### ***Securities Trade Error Correction Procedures***

On infrequent occasions, an error may be made in a client account. For example, a security may be erroneously purchased for the account instead of sold. In these situations, Meridian seeks to rectify the error by placing the client account in a similar position as it would have been had there been no error. Depending on the circumstances, various corrective steps will be taken, including among others canceling the trade or adjusting an allocation.

#### ***Privacy Policy***

Meridian views protecting its customers' private information as a top priority. Meridian has instituted policies and procedures to ensure that customer information is kept private and secure.

Meridian does not disclose any nonpublic personal information about its customers or former customers to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client account, Meridian may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers.

Meridian restricts internal access to nonpublic personal information about its clients to those employees who need to know that information in order to provide products or services to the client. Meridian maintains physical and procedural safeguards that comply with state and federal standards to guard a clients' nonpublic personal information and ensure its integrity and confidentiality. As emphasized above, it has always been and will always be Meridian's policy never to sell information about current or former customers or their accounts to anyone. It is also the Meridian's policy not to share information unless required to process a transaction, at the request of the client, or as required by law.

A copy of the Meridian's privacy policy notice will be provided to each client before or contemporaneously with, the execution of the advisory agreement. After that, Meridian will deliver a copy of the current privacy policy notice to its clients on an annual basis. If you have any questions about this policy, please contact Niki Dillman, Chief Compliance Officer at (859) 543-4516.