

Firm Brochure
(Part 2A of Form ADV)
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This ADV 2A brochure ("Brochure") provides information about the qualifications and business practices of LaFleur & Godfrey LLC ("LaFleur & Godfrey," "we" or the "Firm"). If you have any questions about the contents of this brochure, please contact John Dice at: (616) 942-1580, or by email at: johnd@lafleurgodfrey.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 LaFleur & Godfrey LLC is available on the SEC's website at www.adviserinfo.sec.gov. You can find us by searching our name, or our unique identifying number, known as a CRD number, which is 168831.

Registration does not imply a certain level of skill or training.

Item 2 - Material Changes

Investment advisers are required to provide their clients with a summary of material changes made to their Brochure since the time of the last annual updating amendment and offer to provide the entire brochure free of charge. Since the time of the last annual update of our Brochure, on March 29, 2019, we note the following changes:

- John W. Dice, who joined our Firm in August 2019 as Chief Operating Officer, has been named Chief Compliance Officer (“CCO”) of the Firm. Mr. Dice’s appointment frees up the previous CCO, Dan VanTimmeren, who is one of the Firm’s Co-Presidents and Portfolio Managers, to focus more of his energies to managing investments and meeting with clients. The cover of our Brochure has been revised to reflect this change.
- LaFleur & Godfrey LLC developed two investment strategies that will be used with new clients as well as with existing client relationships where appropriate. The strategies adhere to our investment principles which favor active investing, company ownership and focused portfolios. These strategies are described further in Item 8 of this Brochure.

This summary does not identify every change to this Brochure. Clients are encouraged to review the Brochure in its entirety. A complete copy of our Brochure, free of charge, is available by contacting us by telephone at: (616) 942-1580 or by email at: johnd@lafleurgodfrey.com.

Additional information about LaFleur & Godfrey LLC is available on the SEC’s website at www.adviserinfo.sec.gov. You can find us by searching our name, or our unique identifying number, known as a CRD number, which is 168831.

Item 3 - Table of Contents

Item 2 -Material Changes

Full Brochure Available.....	1
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Item 4 -Advisory Business

Firm History	4
Focus Financial Partners	4
Firm Management	5
Our Services	5
Additional Services	5
Discretionary Client Assets	5

Item 5 -Fees and Compensation

Description.....	5
Fee Billing	6
Other Fees.....	6
Termination of Agreement	6

Item 6 -Performance-Based Fees and Side by Side Management

Sharing of Capital Gains	6
--------------------------------	---

Item 7 -Types of Clients

Description.....	6
------------------	---

Item 8 -Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis.....	7
Investment Strategies	7
Risk of Loss	7

Item 9 -Disciplinary Information

Legal and Disciplinary.....	9
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Item 10 -Other Financial Industry Activities and Affiliations

Financial Industry Activities.....	9
Affiliations	10

Item 11 -Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	
Code of Ethics.....	12
 Item 12 -Brokerage Practices	
Selecting Brokerage Firms.....	12
Recommended Custodian Broker-Dealer.....	13
Aggregation and Allocation.....	14
Directed Brokerage.....	14
Trade Errors	15
 Item 13 -Review of Accounts	
Periodic Reviews	15
Review Triggers.....	15
Regular Reports.....	15
 Item 14 -Client Referrals and Other Compensation	
Incoming Referrals.....	16
Solicitation Arrangements	16
Referrals Out	17
 Item 15 -Custody	
Account Statements	17
Performance Reports.....	17
 Item 16 -Investment Discretion	
Discretionary Authority for Trading.....	17
 Item 17 -Voting Client Securities	
Proxy Votes	18
 Item 18 -Financial Information	
Financial Condition	18

Item 4 -Advisory Business

Firm History

LaFleur & Godfrey LLC (“LaFleur & Godfrey”) is an SEC-registered investment adviser formed as a limited liability company on August 1, 2013 in the State of Delaware, as successor to the business of LaFleur & Godfrey, Inc. (“LaFleur & Godfrey”), which registered with the SEC in 2001.

Focus Financial Partners, LLC

LaFleur & Godfrey LLC is part of the Focus Financial Partners, LLC (“Focus LLC”) partnership. Specifically, LaFleur & Godfrey LLC is a wholly-owned subsidiary of Focus Operating, LLC (“Focus Operating”), which is a wholly-owned subsidiary of Focus LLC. Focus Financial Partners Inc. (“Focus Inc.”) is the sole managing member of Focus LLC and is a public company traded on the NASDAQ Global Select Market. Focus Inc. owns approximately two-thirds of the economic interests in Focus LLC.

Focus Inc. has no single 25% or greater shareholder. Focus Inc. is the managing member of Focus LLC and has 100% of its governance rights. Accordingly, all governance is through the voting rights and Board at Focus Inc. As of the end of 2019, investment vehicles affiliated with Stone Point Capital, LLC (“Stone Point”) had a greater than 25% voting interest in Focus Inc., and Stone Point had the right to designate two of seven directors on the Focus Inc. Board. As of the end of 2019, investment vehicles affiliated with Kohlberg Kravis Roberts & Co. L.P. (“KKR”) had a less than 25% voting interest in Focus Inc., and KKR had the right to designate one of seven directors on the Focus Inc. Board.

Focus LLC also owns other registered investment advisers, broker-dealers, pension consultants, insurance firms, business managers and other financial service firms (the “Focus Partners”), most of which provide wealth management, benefit consulting and investment consulting services to individuals, families, employers, and institutions. Some Focus Partners also manage or advise limited partnerships, private funds, or investment companies as disclosed on their respective Form ADV’s.

Firm Management

LaFleur & Godfrey LLC is managed by Daniel VanTimmeren and John Koczara (LaFleur & Godfrey LLC Principals”), pursuant to a management agreement between Charlevoix Management LG LLC and LaFleur & Godfrey LLC. The LaFleur & Godfrey LLC Principals serve as officers of LaFleur & Godfrey LLC and are responsible for the management, supervision and oversight of LaFleur & Godfrey LLC.

Our Services

LaFleur & Godfrey LLC provides personalized, comprehensive and confidential wealth management to clients who are primarily individuals, including high net worth individuals, and their trusts and estates. We also advise pension and profit-sharing plans, charitable organizations and small businesses. We are a fee-only Firm who invests client assets

in a manner designed to assist our clients in meeting their goals and needs as communicated in meetings with us. We typically invest in individual stocks and bonds in accordance with investment principals which favor active investing, company ownership and focused portfolios. (Client portfolios may also hold other types of securities such as exchange traded funds (“ETFs”) and mutual funds.) The terms of our relationship with clients are explained in the investment management agreements clients sign with us.

We are a fiduciary under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”) with respect to investment management services and investment advice provided to ERISA plan clients, including ERISA plan participants. LaFleur & Godfrey LLC is also a fiduciary under the Internal Revenue Code (the “IRC”) with respect to investment management services and investment advice provided to ERISA plans, ERISA plan participants, IRAs and IRA owners (collectively, “Retirement Account Clients”). As such, LaFleur & Godfrey LLC is subject to specific duties and obligations under ERISA and the IRC that include, among other things, prohibited transaction rules which are intended to prohibit fiduciaries from acting on conflicts of interest. When a fiduciary gives advice in which it has a conflict of interest, the fiduciary must either avoid or eliminate the conflict or rely upon a prohibited transaction exemption (a “PTE”).

Additional Services

We offer clients the option of obtaining certain financial solutions from unaffiliated third-party financial institutions with the assistance of our affiliate, Focus Client Solutions (“FCS”). Please see Item 10 for fuller discussion of these services and other important information.

Discretionary Client Assets

We invest client assets on a discretionary basis pursuant to a limited power of attorney clients give us in their client agreements. As of December 31, 2019, LaFleur & Godfrey LLC managed approximately \$540 million in client assets on a discretionary basis.

Item 5 – Fees and Compensation

Description

LaFleur & Godfrey LLC bases its fees on a percentage of assets under management. Our standard annual Investment Management Agreement fee for new clients is calculated as follows:

- 0.85% on the first \$1,000,000;
- 0.60% on the next \$4,000,000 (from 1,000,001 to 5,000,000); and
- 0.35% on the assets above \$5,000,000.

Fees are negotiable under certain circumstances, such as client size, service levels required, charitable organizations, and special projects. In addition, certain current clients are subject to fee schedules which are higher and lower than the fee schedule above.

Fee Billing

Investment management fees are calculated on an average daily balance, and billed quarterly in arrears, meaning that we invoice you after the three-month billing period has ended. Payment in full is expected upon invoice presentation. Advisory fees may be directly debited from the custodian account with the client's written consent. For related accounts (other than ERISA accounts) fees may be deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Other Fees

In addition to our fees, clients are responsible for the fees and expenses associated with the investment of their assets. These fees and expenses may include brokerage commissions and mark ups and mark downs, transaction fees, custodial fees, deferred sales charges, wire transfer and electronic fund fees, and other fees and taxes related to brokerage accounts and securities transactions. In addition, if your account holds investment vehicles such as mutual funds, ETFs and/or private investment funds, you will be subject to the internal management fees and expenses charged by these vehicles. These fees and expenses will reduce the performance of your account.

Termination of Agreement

The client or the investment manager may terminate an Agreement by written notice to the other party as set forth in the Investment Management Agreement. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The standard fee calculation applies, adjusted for the number of days during the billing quarter prior to termination.

Item 6 - Performance-Based Fees and Side by Side Management

Sharing of Capital Gains

Our standard advisory fees are not based on a share of the capital gains or capital appreciation of managed securities.

Item 7 - Types of Clients

Description

Our clients are primarily individuals, including high net worth individuals, and their trusts and estates. We also advise pension and profit-sharing plans, charitable organizations

and small businesses. We do not have a formal account minimum, but we reserve the discretion to decline to accept client engagements that are not a fit with our Firm.

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis is primarily done using fundamental analysis.

Fundamental analysis looks at all aspects of a business, including management, products and/or services, and financials in deciding whether to invest in the security.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, company press releases, and the World Wide Web.

Investment Strategies

Our investment principals which favor active investing, company ownership and focused portfolios.

The investment strategy we implement for a specific client is based upon the client's objectives as communicated to us during consultations. The client may change these objectives at any time.

Our investment strategies include the following:

The Focused Core 30 Equity Strategy leverages the strength of the firm in constructing, monitoring, and managing the approximate 30 stocks that comprise this growth strategy. Both Macro considerations and Company specific fundamentals frame each investment decision such as: Global GDP forecasts, US GDP forecasts, Fed monetary policy, Fiscal policy, Inflation outlook, Company balance sheet strength, Low debt levels, Strong free cash flow, etc.

The Focused Dividend 10 Equity Strategy is also a firm-managed individual stock portfolio. However, the emphasis is on dividend paying stocks that provide current income to clients. Primary considerations in making security selections include: balance sheet quality, cash flow generation, earnings sustainability, yield and tax sensitivity.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks based on the type of investments we use in managing client accounts:

- ◇ 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 customers 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.
- ◇ Cybersecurity Risk: The computer systems, networks and devices used by LaFleur & Godfrey LLC and service providers to us and our clients to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches. Despite the various protections utilized, systems, networks, or devices potentially can be breached. A client could be negatively impacted as a result of a cybersecurity breach. Cybersecurity breaches can include unauthorized access to systems, networks, or devices; infection from computer viruses or other malicious software code; and attacks that shut down,

disable, slow, or otherwise disrupt operations, business processes, or website access or functionality. Cybersecurity breaches may cause disruptions and impact business operations, potentially resulting in financial losses to a client; impediments to trading; the inability by us and other service providers to transact business; violations of applicable privacy and other laws; regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs; as well as the inadvertent release of confidential information. Similar adverse consequences could result from cybersecurity breaches affecting issuers of securities in which a client invests; governmental and other regulatory authorities; exchange and other financial market operators, banks, brokers, dealers, and other financial institutions; and other parties. In addition, substantial costs may be incurred by these entities in order to prevent any cybersecurity breaches in the future.

- ◇ Options Transactions - an option is a financial instrument that establishes a contract between two parties concerning the buying or selling of an asset at a reference price during a specified time frame. During this time frame, the buyer of the option gains the right, but not the obligation, to engage in some specific transaction on the asset, while the seller incurs the obligation to fulfill the transaction if requested by the buyer. The price of an option derives from the value of an underlying asset (commonly a stock, a bond, a currency or a futures contract) plus a premium based on the time remaining until the expiration of the option. Other types of options exist, and options can in principle be created for any type of valuable asset. In return for granting the option, called writing the option, the originator of the option collects a payment, the premium, from the buyer. The writer of an option must make good on delivering (or receiving) the underlying asset or its cash equivalent, if the option is exercised. The use of options as an investment strategy can involve a significant risk which may result in significant loss based upon market conditions.

Item 9 - Disciplinary Information

Legal and Disciplinary

Registered investment advisers are required to disclose all material facts regarding a legal or disciplinary event that would be material to a prospective or existing client's evaluation of LaFleur & Godfrey LLC or the integrity of LaFleur & Godfrey LLC's management. We have no information to disclose in response to this item.

Item 10 -Other Financial Industry Activities and Affiliations

Financial Industry Activities

LaFleur & Godfrey LLC has no other financial industry activities.

Financial Industry Affiliations

FOCUS CLIENT SOLUTIONS

We offer clients the option of obtaining certain financial solutions from unaffiliated third-party financial institutions with the assistance of our affiliate, Focus Client Solutions (“FCS”), a wholly owned subsidiary of our parent company, Focus Financial Partners, LLC. These third-party financial institutions are banks and non-banks (the “Network Institutions”) which offer credit and cash management solutions to our clients. Certain other unaffiliated third parties provide administrative and settlement services to facilitate FCS’s cash management solutions. FCS acts as an intermediary to facilitate our clients’ access to these credit and cash management solutions.

FCS receives quarterly fees (the “Network Fees”) from the Network Institutions and certain administrative services providers (the “Administrative Services Providers” and, together with the Network Institutions, the “Network Providers”) in exchange for allowing them to participate in the FCS credit and cash management programs and thereby to offer their services to our clients. The Network Fees are substantial and are expected to change over time. Such fees are revenue for FCS and ultimately for our common parent company, Focus Financial Partners, LLC, but we do not share in such revenue. Additionally, together with Focus, we have paid FCS an amount equal to our pro rata share of the Network Fees obtained by FCS, and FCS has in turn rebated that amount to the Network Institutions on a pro rata basis. The effect of this payment/rebate mechanism has been to eliminate the receipt of any incremental revenue by our affiliates as a result of our clients’ use of FCS’s services. Accordingly, we have addressed this potential conflict of interest by: (1) disclosing the above arrangements to our clients; (2) offering FCS solutions to clients on a strictly nondiscretionary and fully disclosed basis, and not as part of any discretionary investment services; (3) not sharing in any portion of FCS’s revenue in exchange for successfully offering these credit and cash management products to our clients; and (4) eliminating our affiliates’ receipt of revenue attributable to our clients’ use of FCS’s services. Additionally, we note that clients who use FCS’s services will receive robust product-specific disclosure from the Network Providers that provide such services to our clients.

Even if we and FCS do not retain a portion of the Network Fees attributable to our clients’ use of FCS’s services (which mitigates the conflict that would otherwise have arisen from our receipt of incremental revenue), FCS indirectly benefits from our clients’ use of the services insofar as such use incentivizes the Network Providers to maintain their relationship with FCS and to continue paying Network Fees to FCS. It also may support increases in the overall amount of the Network Fee rates in the future. In addition, our interest in continuing to receive investment advisory fees from client accounts gives us a financial incentive to recommend that clients borrow money rather than liquidating some or all of the assets we manage, and that creates a conflict of interest when we recommend FCS to provide credit solutions to our clients.

FCS Credit Solutions

For FCS credit solutions, the interest rate of the loan is ultimately dictated by the lender, although in some circumstances FCS may have the ability to influence the lender to lower the interest rate of the loan within certain parameters. The final rate may be higher or lower than the prevailing market rate. We can offer no assurances that the rates offered to you by the lender are the lowest possible rates available in the marketplace.

Clients retain the right to pledge assets in accounts generally, subject to any restrictions imposed by clients' custodians. While the FCS program facilitates secured loans through Network Institutions, clients are free instead to work directly with institutions outside the FCS program. Because of the limited number of participating Network Institutions and FCS's financial arrangements with those institutions, clients may be limited in their ability to obtain as favorable loan terms as if the client were to work directly with other banks to negotiate loan terms or obtain other financial arrangements.

Clients should also understand that pledging assets in an account to secure a loan involves additional risk and restrictions. A Network Institution has the authority to liquidate all or part of the pledged securities at any time, without prior notice to clients and without their consent, to maintain required collateral levels. The Network Institution also has the right to call client loans and require repayment within a short period of time; if the client cannot repay the loan within the specified time period, the Network Institution will have the right to force the sale of pledged assets to repay those loans. Selling assets to maintain collateral levels or calling loans may result in asset sales and realized losses in a declining market, leading to the permanent loss of capital. These sales also may have adverse tax consequences. Interest payments and any other loan-related fees are borne by clients and are in addition to the advisory fees that clients pay us for managing assets, including assets that are pledged as collateral. The returns on pledged assets may be less than the account fees and interest paid by the account. Clients should consider carefully and skeptically any recommendation to pursue a more aggressive investment strategy in order to support the cost of borrowing, particularly the risks and costs of any such strategy. More generally, before borrowing funds, a client should carefully review the loan agreement, loan application, and other forms and determine that the loan is consistent with the client's long-term financial goals and presents risks consistent with the client's financial circumstances and risk tolerance.

FCS Cash Management Solutions

For FCS cash management solutions, as stated above, certain third-party intermediaries provide administrative and settlement services in connection with the program. Those intermediaries each charge a fixed basis point fee on total deposits in the program, which are deducted from clients' cash balances in the program. Engaging FCS, the Network Institutions, and these other intermediaries to provide cash management solutions does not alter the way we treat cash for billing purposes.

Clients should understand that in rare circumstances, depending on interest rates and other economic and market factors, the yields on cash management solutions could be

lower than the aggregate fees and expenses charged by the Network Institutions, the intermediaries referenced above, and us. Consequently, in these rare circumstances, a client could experience a negative overall investment return with respect to those cash investments. Nonetheless, it might still be reasonable for a client to participate in the FCS cash management program if the client prefers to hold cash at the Network Institutions rather than at other financial institutions (e.g., to take advantage of FDIC insurance).

Focus Financial Partners

As noted above in response to Item 4, certain investment vehicles managed by Stone Point collectively are principal owners of Focus LLC and Focus Inc., and certain investment vehicles managed by KKR collectively are minority owners of Focus LLC and Focus Inc. Because LaFleur & Godfrey LLC is an indirect, wholly-owned subsidiary of Focus LLC and Focus Inc., the Stone Point and KKR investment vehicles are indirect owners of LaFleur & Godfrey LLC. None of Stone Point, KKR, or any of their affiliates participates in the management or investment recommendations of our business.

LaFleur & Godfrey LLC does not believe the Focus Partnership presents a conflict of interest with our clients. Except as disclosed above, LaFleur & Godfrey LLC has no business relationship with other Focus Partners that is material to its advisory business or to its clients.

Additional information about Focus can be found at www.focusfinancialpartners.com.

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

Code of Ethics

The employees of LaFleur & Godfrey LLC have committed to a Code of Ethics that is available for review by clients and prospective clients upon request.

Subject to the firm's Code of Ethics, LaFleur & Godfrey LLC and its employees may buy or sell securities that are also held by clients. This is a potential conflict of interest. Our Code of Ethics is designed to mitigate the potential conflict of interest by implementing preclearance requirements for certain securities transactions by Firm personnel and requiring them to report their personal securities holdings and transactions for compliance review.

Item 12 - Brokerage Practices

Selecting Brokerage Firms

For client accounts that custody with a bank or trust company, LaFleur & Godfrey LLC has full discretion as to which broker dealer to execute brokerage transactions. For

these accounts, LaFleur & Godfrey LLC executes equity securities transactions at RBC and William Blair, broker-dealers who provide research services to our firm, for 5 cents per share. Clients should understand that their commission dollars are used toward research that will likely benefit their portfolio, but also benefits other client portfolios. In order to obtain investment research and analysis furnished by these “research” brokerage firms, clients may pay a brokerage commission which is higher than commissions generally available in recognition of the value of services provided to LaFleur & Godfrey LLC by the brokerage firm. Services obtained for one client may also benefit other clients. LaFleur & Godfrey LLC considers various factors in the selection of a broker, including research capabilities, research recommendations, ability to execute trades, depth of services provided, processing capabilities, financial stability and responsibility, reputation, commission rate, responsiveness to LaFleur & Godfrey LLC and the value of brokerage and research services provided by such brokers.

Research Services provided by brokers may include: proprietary research including written company, industry and economic reports. It also includes conference calls with analysts and corporate managements, and invitations to single and multi-day investment conferences, which feature presentations by managements of companies in which LaFleur & Godfrey LLC has investments on behalf of its clients, or prospective interest in investment.

Research and execution-related services provided by brokers may be proprietary products and services of the brokers. When LaFleur & Godfrey LLC uses client brokerage commissions to obtain research and other permitted products and services, LaFleur & Godfrey LLC receives a benefit in that LaFleur & Godfrey LLC does not therefore have to produce or pay for the research, products or services. LaFleur & Godfrey LLC therefore has an incentive to select or recommend a broker dealer based on LaFleur & Godfrey LLC’s interest in receiving the research, rather than on LaFleur & Godfrey LLC’s clients’ interest in receiving most favorable execution. This is a conflict of interest. We believe that the execution of securities transactions through RBC and William Blair is appropriate because it provides lawful and appropriate assistance in our investment decision making responsibilities to client accounts.

Recommended Custodian Broker-Dealer

For clients who have not custodied their assets at a bank, LaFleur & Godfrey LLC recommends a custodian broker-dealer based on LaFleur & Godfrey LLC’s experience with the quality of the Firm’s services and fees. As LaFleur & Godfrey LLC will not request the discretionary authority to determine the broker dealer to be used or the commission rates to be paid for mutual fund and equity securities transactions, clients must direct LaFleur & Godfrey LLC as to the broker dealer to be used in their client agreements with us.

We routinely recommend that clients custody their assets with Charles Schwab & Co., an independent custodian and broker-dealer, and direct us to execute all securities transactions with Schwab. Clients should understand that by directing us to use a

particular broker or dealer, we will not seek more competitive execution through other broker-dealers, and best execution may not be achieved. Not all investment advisors require clients to direct the use of specific brokers.

LaFleur & Godfrey LLC participates in the Schwab Advisor Services (SAS) program offered to independent investment advisors by Charles Schwab & Company, Inc. Schwab is a FINRA-registered broker dealer.

The Schwab program provides LaFleur & Godfrey LLC with access to services which are not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis at no charge to them. These services benefit LaFleur & Godfrey LLC but may not benefit all client accounts. Many of the products and services assist LaFleur & Godfrey LLC in managing and administering client accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of LaFleur & Godfrey LLC's fees from its clients' accounts, and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of LaFleur & Godfrey LLC's accounts. Recommended brokers also make available to LaFleur & Godfrey LLC other services intended to help LaFleur & Godfrey LLC manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. LaFleur & Godfrey LLC does not, however, enter into any commitments with the brokers for transaction levels in exchange for any services or products from brokers. While as a fiduciary, LaFleur & Godfrey LLC endeavors to act in its clients' best interests, LaFleur & Godfrey LLC's recommendation that clients maintain their assets in accounts at Schwab could potentially be influenced by the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the brokers. We seek to mitigate this conflict of interest through disclosure and periodically reviewing the quality of services provided to client accounts.

Aggregation and Allocation

When it is appropriate, LaFleur & Godfrey LLC may aggregate or "block" client orders to achieve more efficient execution. LaFleur & Godfrey LLC attempts to group its stock trades in blocks where possible. In such instances, each client account participating in the aggregate transaction will be charged the average price per unit for the security. We seek to place, aggregate and allocate trades among our clients in a manner that is fair and equitable under the circumstances.

Directed Brokerage

Certain clients have custodied their accounts at broker-dealer custodians, that we have not recommended, and we are only able to execute transactions through the particular

broker-dealer custodian selected by the client. A client that custodies their account at a broker-dealer custodian who requires LaFleur & Godfrey LLC to execute securities transactions through that particular broker should be aware that LaFleur & Godfrey LLC will not be able to aggregate securities transactions to obtain more favorable price or seek to execute securities transactions through other broker-dealers in order to obtain more favorable prices or execution than the prices or execution offered by the directed broker. Clients therefore may not be able to obtain best execution for their transactions and may receive less favorable prices and pay a higher commission rate for executing these transactions. Ultimately, these arrangements may cost clients more money.

LaFleur & Godfrey LLC does not have any arrangements to compensate any broker dealer for client referrals.

Trade Errors

When trading client accounts, errors may periodically occur. LaFleur & Godfrey LLC endeavors to correct errors promptly and, when we are responsible for the error, in a manner that makes the client whole. We do not retain any client trade error gains.

Item 13 - Review of Accounts

Periodic Reviews

Account reviews are performed regularly for changes in cash balances resulting from deposits, withdrawals, and bond maturities and at least quarterly for strategy review and asset allocation rebalancing. Reviews are done by the firm principals as well as assistant portfolio manager as supervised by the principals. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

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

Regular Reports

Firm principals, who have responsibility for specific client relationships, perform account reviews. They review each account for asset allocation versus targets, fixed income strategy and individual stock selections and diversification and the likelihood that the performance of each security will contribute to the investment objectives of the client. Clients receive written transaction and valuation reports at least quarterly from their account custodian. LaFleur & Godfrey LLC produces, at a minimum annually, and more likely quarterly, a comprehensive report that includes a statement of investment objectives, a review of strategy, a summary of security transactions, a schedule of realized gains and losses, performance results and comparisons, and an economic and market outlook commentary. This report is usually presented by the responsible principal

in a face-to-face meeting with the client. If a personal meeting cannot be arranged, the report will be mailed to the client.

Item 14 - Client Referrals and Other Compensation

Incoming Referrals

LaFleur & Godfrey LLC 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.

LaFleur & Godfrey LLC's parent company is Focus Financial Partners, LLC ("Focus"). From time to time, Focus holds partnership meetings and other industry and best-practices conferences, which typically include LaFleur & Godfrey LLC, other Focus firms and external attendees. These meetings are first and foremost intended to provide training or education to personnel of Focus firms, including LaFleur & Godfrey LLC. However, the meetings do provide sponsorship opportunities for asset managers, asset custodians, vendors and other third-party service providers. Sponsorship fees allow these companies to advertise their products and services to Focus firms, including LaFleur & Godfrey LLC. Although the participation of Focus firm personnel in these meetings is not preconditioned on the achievement of a sales target for any conference sponsor, this practice could nonetheless be deemed a conflict as the marketing and education activities conducted, and the access granted, at such meetings and conferences could cause LaFleur & Godfrey LLC to focus on those conference sponsors in the course of its duties. Focus attempts to mitigate any such conflict by allocating the sponsorship fees only to defraying the cost of the meeting or future meetings and not as revenue for itself or any affiliate, including LaFleur & Godfrey LLC. Conference sponsorship fees are not dependent on assets placed with any specific provider or revenue generated by such asset placement. The following entities have provided conference sponsorship to Focus in the last year:

Fidelity Brokerage Services, LLC
Fidelity Institutional Asset Management LLC
Orion Advisor Services, LLC
Charles G. Schwab & Co., Inc.
eMoney Advisors, LLC
Envestnet Financial Technologies, Inc.

Solicitation Arrangements

LaFleur & Godfrey LLC has arrangements in place with certain third parties whereby we compensate them for client referrals by paying them a percentage of the investment advisory fees we receive from the solicited clients. Solicitation arrangements inherently give rise to potential conflicts of interest because the solicitor is receiving an economic benefit for the recommendation of advisory services. Rule 206(4)-3 of the Advisers Act

(the “Cash Solicitation Rule”) addresses this conflict of interest by requiring advisers who pay third party solicitors to enter into agreements requiring the solicitors to make certain disclosures to solicited potential clients. In accordance with the Cash Solicitation Rule, we require third party solicitors who introduce potential clients to us to provide the potential client with a copy of this disclosure brochure and a copy of the solicitor’s disclosure statement which explains that the solicitor will be compensated for the referral and contains the terms and conditions of the solicitation arrangement, including the compensation the solicitor is to receive.

Referrals Out

LaFleur & Godfrey LLC does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them. The benefits we receive from Schwab are described in our response to Item 12.

Item 15 – Custody

Account Statements

All assets are held at qualified custodians, and the custodians provide account statements directly to clients at their address of record at least quarterly.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the review report statements provided by LaFleur & Godfrey LLC.

Item 16 - Investment Discretion

Discretionary Authority for Trading

LaFleur & Godfrey LLC has discretionary authority to manage securities accounts on behalf of clients. Under a limited power of attorney contained in our agreement with clients, we have the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Clients are permitted to impose reasonable written restrictions on the investments in their accounts, for example, to prohibit certain investments for moral, ethical, or religious reasons or to limit any single asset to a maximum percent of the total portfolio market value.

Item 17 - Voting Client Securities

Proxy Votes

LaFleur & Godfrey LLC has adopted a proxy voting policy reasonably designed to vote client proxies in the best interest of clients. LaFleur & Godfrey LLC's principals constitute the Proxy Committee and must agree on a voting position with respect to proposals which are not covered by the firm's proxy voting guidelines. The guidelines address five general categories: Corporate Governance; Takeover Defense; Compensation Plans (generally against plans which are dilutive and overly generous) Capital Structure; Classes of Stock and Recapitalization; and Social Responsibility (the Firm opposes most of these proposals; however, each is evaluated carefully whether favored or opposed by management.) Generally, we do not allow clients to instruct us how to vote specific proxies although we will consider such instructions upon request.

In the event of a vote involving a conflict of interest that does not meet the specific voting parameters of LaFleur & Godfrey LLC's proxy voting guidelines or requires additional company-specific decision-making, LaFleur & Godfrey LLC may request an independent third-party review. Clients may call, write, or email us to request a copy of LaFleur & Godfrey LLC's complete proxy voting policy, voting records of how securities have been voted in their particular account, or to discuss questions they may have about their proxies. Our contact information is on the cover page of this brochure.

Item 18 - Financial Information

Financial Condition

LaFleur & Godfrey LLC does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. A balance sheet is not required to be provided because LaFleur & Godfrey LLC does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

Brochure Supplement (Part 2B of Form ADV) March 29, 2020

This brochure supplement provides information about Daniel S. VanTimmeren and John K. Koczara to supplement the LaFleur & Godfrey, LLC brochure. You should have received a copy of that brochure. Please contact Daniel S. VanTimmeren if you did not receive LaFleur & Godfrey, LLC's brochure or if you have any questions about the contents of this supplement.

Education and Business Standards

LaFleur & Godfrey requires that advisors in its employ have a bachelor's degree and a minimum of 10 years work experience in investment management, banking, or brokerage. For those with advanced coursework, the work experience requirement is reduced to two years. Examples of acceptable coursework include: an MBA, a CFA, a JD, or a CPA.

Professional Certifications Employees may have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (CFP): Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

Chartered Financial Analyst (CFA): Chartered Financial Analysts are licensed by the CFA Institute to use the CFA mark. CFA certification requirements:

- Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.
- Successful completion of all three exam levels of the CFA Program.
- Have 48 months of acceptable professional work experience in the investment decision-making process.
- Fulfill society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by your sponsors.
- Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.

Daniel S. VanTimmeren

Educational Background:

- Date of birth: 10/2/61
- Michigan State University, BA Finance, 1983

Business Experience:

- Investment Counselor, Partner, LaFleur & Godfrey LLC (2019 – Present)
- Investment Counselor, Partner and CCO, LaFleur & Godfrey LLC (2013 – 2019)
- Investment Counselor and Principal, LaFleur & Godfrey, Inc. (2010 – 2013)

Disciplinary Information: None

Other Business Activities:

Daniel S. VanTimmeren serves as an elected volunteer board member of Kent Community Hospital Foundation. The board manages endowment funds for the Foundation. Dan is also a volunteer board member of Grace Adventures, LOVE I.N.C. and serves on the investment committee for The Reformed Church of America wherein they advise on the church's liquid funds, endowment funds and retirement funds.

Additional Compensation: Daniel S. VanTimmeren may directly or indirectly receive earn-out or other compensation from Focus Financial Partners, LLC, the indirect parent company of LaFleur & Godfrey LLC.

Supervision:

Daniel S. VanTimmeren is supervised by John K. Koczara, CO-President and Secretary. He reviews Daniel S. VanTimmeren's work through frequent office interactions as well as remote interactions. He also reviews Daniel S. VanTimmeren's activities through our client relationship management system.

John K. Koczara's contact information:
(616) 942-1580 or John@lafleurgodfrey.com

John K. Koczara, CFA

Educational Background:

- Date of birth: 6/11/69
- Michigan State University, BA Finance, 1991

Business Experience:

- Senior Portfolio Manager and Principal, LaFleur & Godfrey LLC (2013 – present)
- Portfolio Manager and Principal, Ambs Investment Counsel, LLC (2010-2013)

Disciplinary Information: None

Other Business Activities: Michigan State University Finance Advisory Board.

Additional Compensation: John K. Koczara may directly or indirectly receive earn-out or other compensation from Focus Financial Partners, LLC, the indirect parent company of LaFleur & Godfrey LLC.

Supervision:

John K. Koczara is supervised by Daniel S. VanTimmeren, CO-President and CFO. He reviews John K. Koczara's work through frequent office interactions as well as remote interactions. He also reviews John K. Koczara's activities through our client relationship management system.

Daniel S. VanTimmeren's contact information:
(616) 942-1580 or danvt@lafleurgodfrey.com

John W. Dice, CFP

Educational Background:

- Date of birth: 2/9/65
- Hope College, BA Business Administration, 1987
- Grand Valley State University, MBA Business Administration 2000

Business Experience:

- Chief Operating Officer and Chief Compliance Officer, LaFleur & Godfrey LLC (2019 – present)
- Chief Wealth Management Officer, Macatawa Bank (2006-2018)

Disciplinary Information: None

Other Business Activities: John W. Dice serves on the volunteer board as Treasurer for the Guiding Light Mission in Grand Rapids.

Additional Compensation: John W. Dice may receive other compensation in addition to his annual salary as a result of sourced new clients.

Supervision:

John W. Dice is supervised by Daniel S. VanTimmeren and John K. Koczara. They review John W. Dice's work through frequent office interactions as well as remote interactions. They also review John W. Dice's activities through our client relationship management system.