



# Financial Transparency

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Greensboro, NC 27410

## **Form ADV Part 2A – Firm Brochure**

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[www.financialtransparencyllc.com](http://www.financialtransparencyllc.com)

Dated: March 31, 2020

This brochure provides information about the qualifications and business practices of Envision Financial Transparency, LLC dba Financial Transparency. If you have any questions about the content of this firm brochure, please contact us at (336) 715-3300.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or any State Securities Administrator. Additional information about Financial Transparency is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique number, known as a CRD number. Envision Financial Transparency's CRD number is 297713.

While the firm and its associates may be registered and/or licensed within a particular jurisdiction, that registration and/or licensing in itself does not imply an endorsement by any regulatory authority, nor does it imply a certain level of skill or training on the part of the firm or its associated personnel.

## Item 2: Material Changes

Financial Transparency is required to advise you of any material changes to our Firm Brochure (“Brochure”) from our last annual update. The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or may contact our firm at (336) 715-3300 to request a copy at any time.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

There have been the following material change since our last updated Firm Brochure:

- The firm has updated its assets under management in Item 4.
- Trade names for representatives of the firm have been added to Item 4.
- Item 5 has been updated to reflect custodian fee information and to describe the firm’s receipt of commissions on insurance products.
- Item 10 has been updated to indicate the firm is also a licensed insurance agency and to describe the resulting conflict of interest.
- Item 12 has been updated to reflect the firm does not receive soft dollar benefits in connection with client transactions. Access to market research, performance reporting support and training from the asset custodians that we work with are considered an economic benefit that is reportable under Item 12.
- Item 15 was updated to indicate the firm has custody as a result of some supervised persons of the firm serving as trustees for clients.

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## Item 4: Advisory Business

### Description of Advisory Firm

Envision Financial Transparency, LLC (also referred to below as Financial Transparency or the Advisor) is a North Carolina limited liability company formed in 2018. Our original registration occurred in 2018, as a registered investment advisory firm, and our firm and its associates may register or meet certain exemptions to registration and/or licensing in other jurisdictions in which we conduct investment advisory business.

Ms. Emily Keagle is the firm's Founder, Managing Member and Chief Compliance Office.

### Description of Advisory Services Offered

At Financial Transparency, we offer on-going asset management services to help you achieve your financial goals. Through personal discussions with our independent advisory representatives (IARs), your objectives are identified to build a portfolio that is designed to work within your risk tolerance. We provide advisory services and financial planning to individuals, families, retirement plans, businesses, and other organizations.

We work with you, and all of our clients as a fiduciary, we have a duty to act in the best interest of our clients and must disclose any conflicts that might limit or prevent us from meeting that duty. We believe that clients should know exactly what investments they are in, and that is why we only recommend investments that are readily available and able to be verified and priced by national custodians. We do not offer proprietary products; therefore, our advice and loyalty is centered around you, and not loyalty to any one investment management company, or mutual fund brand.

We assist you in making asset allocation decisions, primarily investing in mutual funds, exchange-traded funds, individual securities (stocks), and bonds. From these investment vehicles, a diversified portfolio is created that may include investments representing various market segments, also called asset classes. The determination of the balance of asset classes is based on your profile and risk tolerance.

One way that we work with clients is through Individual Financial Consultations. We can provide comprehensive evaluations of your current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. We provide consultations on existing financial plans and opinions on current portfolio allocations and holdings. We review existing insurance policies to ensure proper life coverage. The service to be provided may be unique to the client's situation and is agreed upon in a written agreement. You will receive a detailed written report tailored to your financial needs.

You may select from our three offered discretionary asset management programs: Let's Get Started, Managed Investment Portfolios or Customized Managed Accounts.

The Let's Get Started program makes investing easy. We believe that you deserve a dedicated professional investment advisory representative and not just a call center. You and your IAR will complete an investor profile, to identify your risk tolerance, and select a corresponding passively invested asset allocation model. Your portfolio will be automatically re-balanced semi-annually, as well as when any material deposits or withdrawals are made. You will have online access to your account 24/7 and receive electronic brokerage statements directly from a national custodian.

The Managed Investment Portfolios (MIP) program may fit your situation if you would like on-going professional management with an IAR who will sit down with you and assist you in selecting one or more asset allocation models to fit your goals and objectives. The asset allocations models are created to accept the underlying assumptions of Modern Portfolio Theory and the Efficient Market Hypothesis. The models are professionally managed, monitored, and re-balanced by the Advisor. Two types of models are available in this program, passive

market investing and active market investing. The passive market investing models are designed to have investment performance that mirrors the indices used in the asset allocation. An emphasis is placed on minimizing manager fees, while selecting investments for this type of investing. The active market investing models are designed to attempt to out-perform the indices used in the asset allocation. Your portfolio will automatically be re-balanced quarterly, as well as when any material deposits or withdrawals are made. You will have online access to your account 24/7 and receive electronic brokerage statements directly from a national custodian. You will also receive electronic quarterly performance reports.

The Customized Managed Accounts (CMA) program may fit your situation if you would like to have an asset allocation that is more tailored to your financial situation. Your customized asset allocation may include asset classes that are not available in the MIP program, such as state specific municipal bonds, niche sectors, like health care, real estate, or technology. If you are interested in socially responsible investing, this may also be the right program for you, as we work with advisors who are primarily focused on this investment philosophy. If you need personalized tax-loss harvesting planning, the CMA program may make the most sense for you. Your portfolio will automatically be re-balanced quarterly, as well as when any material deposits or withdrawals are made. You will have online access to your account 24/7 and receive electronic brokerage statements directly from a national custodian. You will also receive electronic, or paper copies if you prefer, detailed quarterly performance reports. If your investment strategy includes mutual fund and exchange traded managers, you will also receive a manager evaluation.

We also provide Pension Consulting Services. The primary client for this type of service will be the plan sponsor of the pension, profit sharing, and 401(k) plans. Where appropriate, we may offer these services to individuals and charitable organizations. If you are the plan sponsor of the pension plan, we can provide you with Investment Policy Statement (IPS) preparation. This sets the objectives for the management of the overall plan such as, investment selection criteria and timing intervals for monitoring. We also provide services in the selection and on-going monitoring of the investments offered within the plan. For plans with individual plan participants exercising control over assets in their own account, we may also provide to you employee educational support and investment workshops designed for the plan participants. The nature of the topics covered will be guided by ERISA Section 404(c). These employee communications will not provide plan participants with individualized, tailored investment advice.

It is important for clients to remember that past performance is no guarantee of future results and that market, interest rate, and other investment-related risks exist that may adversely affect the performance of securities held and cause losses in an account.

ERISA Accounts: Financial Transparency and its investment advisory representatives are deemed to be fiduciaries to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations that include among other things, restrictions concerning certain forms of compensation. Financial Transparency does not receive security commissions, loads, or 12b-1 fees.

Our firm offers services through our network of IARs. IARs may have their own legal business entities whose trade names and logos are used for marketing purposes and may appear on marketing materials or client statements. Clients should understand that the businesses are legal entities of the IAR and not of Financial Transparency. The IARs are under the supervision of Financial Transparency and the advisory services of the IARs are provided through our firm. We have the arrangement described above with the following IARs:

- Alfred Romano: Clear Perspective Advisors, LLC
- Alysia Hubbard: Financial Transparency

- Anthony Madonia: Downtown Financial Management, LLC
- Bernard Donohue: Donohue Consulting Group, Inc.
- Charles Gilligan: Financial Transparency
- Christopher Nelson: GBK Financial Services, LLC
- Clyde Eugene: O'Baker Eagle Capital Group, LLC
- Daniel Doherty: Oak Knoll Consulting Services, LLC
- Everett Ferguson: Condley Financial Services, Inc.
- Henry Pearson: Pearson Consultants, Inc.
- James Nici: Aristotle Advisors, LLC
- Jonathon Wells: Financial Transparency
- Joshua Keagle: Joshua Tree Investments
- Thomas Giardina: Giardina & Bresett Consulting Services, Inc.
- Thom Rogers: Cornerstone Advisory Consulting, LLC
- William Bresett: Giardina & Bresett Consulting Services, Inc.

As of December 2019, we have reportable assets under management of \$248,788,836 of which \$246,718,578 is discretionarily managed, and \$2,070,258 is non-discretionary.

## Item 5: Fees and Compensation

### Individual Financial Consultations

As the services of Individual Financial Consultations depend on your requests and customized financial plan, the fees vary. Fees may be charged as a fixed-fee or at an hourly rate, rates are based on the complexity of the work being performed, the estimated amount of time involved, the value provided to you, and other relevant factors. The fixed-fee range for this service is generally between \$1,500 to \$10,000 per plan. The typical hourly rate is \$300.00 per hour, and an average client may expect to pay for five hours. Fees will be provided in the Individual Financial Consultation Agreement that is completed prior to the commencement of the engagement.

### Asset Management Programs

In exchange for services provided by Financial Transparency and your personal investment advisory representative, you agree to pay annually a set dollar amount, or a set percentage of total assets held in the accounts in the program.

Advisory Fees will be negotiated between you and your IAR. Further explanation regarding the services provided and fees associated with the program are provided in the Investment Advisory Agreement that you sign before participating in the program. The fees charged to you by the Advisor and IAR, will not exceed these established percentages:

	Maximum Annual Fee Percentage	Program Minimum Assets Under Management
Let's Get Started	Not to Exceed 1.00%	None
Managed Investment Portfolios	Not to Exceed 1.75%	\$25,000
Customized Managed Accounts	Not to Exceed 2.15%	\$150,000

Pension Consulting Services	Not to Exceed 1.50%	\$100,000*
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\*Pension Consulting Services - A total annual minimum fee of \$1,500.00 is required. Financial Transparency will work with startup plans that are likely to meet the minimum assets under management within a year of plan establishment. The plan sponsor will decide whether the advisory fee will be paid by the sponsor or deducted pro-rata from the plan participant's account(s).

Advisory fees are collected from the account quarterly, in arrears, and are based upon the aggregate market value of the assets on the close of business on the last business day of the calendar quarter. The Advisor reserves the right, in its sole discretion, to reduce or waive the advisory fee, or program minimum assets under management, for certain clients, family member and friends of associated persons of the firm.

Termination: The Investment Advisory Agreement may be canceled at any time, by either party, for any reason upon receipt of a written notice. The final invoice will be prorated for the days managed during the quarter. If transferring funds away from the engaged custodian, a temporary administrative hold may be placed on the account until the final advisory fee has been assessed.

Advisory Fees in General: You should note that similar advisory services may, or may not, be available from other registered investment advisors for similar or lower fees. You are not under any obligation to engage us for services, when considering the implementation of any or all advisory recommendations. The implementation of any or all recommendations is solely at your discretion.

All fees paid to the Advisor and IAR are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses, such as fund management fees (expense ratio), 12b-1 fees, etc. are described in each fund's prospectus. If the fund imposes a sales charge, you may pay an initial or deferred sales charge. If you also have other holdings in the same mutual fund family, including within other brokerage accounts, you should make your IAR aware so that we can assist you in determining whether you may qualify for lower breakpoints.

Additional Fees and Expenses: In addition to our advisory fees, you are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction, custody charges, and/or account fees.

#### **Other Fee Information**

For accounts held through E\*TRADE Advisor Services (E\*TRADE), investors pay fees to E\*TRADE for their services, which include, but are not limited to, brokerage commissions and custody fees, among other fees and expenses.

#### **Minimum Cash Balance**

For separate accounts held through E\*TRADE, Financial Transparency will typically maintain 2%-3% of the account's market value in E\*TRADE's cash product.

#### **Annual Asset and Minimum Fees Per Account – E\*TRADE Accounts**

E\*TRADE computes annual asset fees at the end of each quarter and assesses the computed fees each April, July, October and January for the prior quarter. Fees are prorated based on the number of days in each quarter and charged in arrears based on the average daily account balance during the quarter. Their current annual asset fee on assets of \$99,999 is 0.1725%, above that amount through \$499,999 is 0.15%, and assets at \$500,000 and above are charged 0.03% annually.

To support the minimum expense of servicing client accounts, each account is subject to a minimum quarterly asset fee of \$25.

### **Compensation for the Sale of Insurance Products to Clients**

Envision Financial Transparency, LLC is also a registered insurance agency and some of its IARs are licensed to accept compensation for the sale of insurance products to clients. This presents a conflict of interest and gives the supervised person an incentive to recommend insurance based on the compensation received rather than on the client's needs. Clients always have the right to decide whether to purchase recommended insurance and, if purchasing, have the right to purchase those insurance products through other agents that are not affiliated with the Advisor.

Insurance commissions are not our primary source of compensation for advisory services. Advisory fees that are charged to clients are not reduced to offset the received insurance commissions.

### **Item 6: Performance-Based Fees and Side-By-Side Management**

Financial Transparency does not charge performance-based fees.



## Item 7: Types of Clients

Financial Transparency provides advisory services primarily to individuals, including through trusts, estates, 401(k) plans, and IRAs, high net worth individuals, corporate pension and profit-sharing plans, corporations or other businesses, charitable institutions and foundations.

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

When providing investment advisory and financial planning services to you, we may use different types and methods of securities analysis, including, but not limited to: charting, fundamental, technical, and cyclical analysis. When performing securities analyses, we may also use information derived from third-party sources including, but not limited to: financial publications, third party rating and analyses services, company press releases, prospectuses, annual reports, and other public filings made with the United State Securities and Exchange Commission.

**Asset Allocation:** We work with you to identify an appropriate asset allocation for you, created to accept the underlying assumptions of Modern Portfolio Theory and the Efficient Market Hypothesis. A risk of asset allocation is that you may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for your goals.

**Investment Analysis:** We do a comparative analysis of an investment's stated objective or style, investment philosophy, and historical record of performance. Performance of the investment will be reviewed on a quarterly basis, and will be compared to the performance of other securities having similar investment styles, sector, and/or philosophy. A risk of investment analysis is that, past performance does not guarantee future results. An investment, such as a mutual fund, that has been successful may not be able to replicate that success in the future. There is a risk that a manager may deviate from the stated mandate or strategy, which could make the holdings less suitable for your portfolio.

**Investment Strategies:** We use the following strategies in managing your accounts, provided that they are appropriate to your needs, objectives, tolerance for risk, time horizon, and other considerations:

**Long-term purchases:** We purchase securities with the idea of holding them for a year or longer. Typically, we use this strategy when we want exposure to a particular asset class over time. This strategy comes with the risk that you may not take advantage of a short-term gain that could be profitable. Also, a security can decline sharply in value before the decision to sell is made.

**Dollar-cost-averaging purchases:** It may be recommended that you make purchases in scheduled increments of time to "dollar-cost average assets" into your portfolio. This purchase strategy may tend to even out market fluctuations that could have an impact on your purchasing cost basis. With this strategy, there is the risk that the market could only rise while your purchases are scheduled, increasing the cost of the investment purchase.

**Passive and Active investing:** We may recommend either a passive, active, or combination of both, investment approach. The goal of passive investing is to have performance that is similar to the benchmark indices used. A risk of passive investing is that the portfolio may not experience the potential profit of certain sectors, securities, or manager decisions that vary from the broad market. The goal of active investing is to select investments that have demonstrated the potential to outperform the broad market indices. A risk associated to active investing is that an investment declines more than the broad market indices.

## Item 9: Disciplinary Information

Financial Transparency has no legal or disciplinary events to disclose.

## Item 10: Other Financial Industry Activities and Affiliations

Our principal business is providing investment advisory services. However, our executive officers, staff and IARs may also perform duties that involve providing services other than, or in addition to, investment advisory services. Envision Financial Transparency, LLC is also a registered insurance agency so that we may provide more holistic financial services. Some IARs of the firm are also licensed insurance agents and will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. However, we always act in the best interest of the client, including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any IAR in such individual's outside capacities.

IARs may also be engaged in outside employment, as described in each professional's ADV 2B disclosure. As Financial Transparency endeavors to put our client's interests first as part of our fiduciary duty as a registered investment advisor, we take the step of requiring approval and on-going monitoring of outside activities, to ensure that conflicts of interest are properly addressed.

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

In accordance with SEC Rule 204A-1 under the Advisers Act, we have adopted a written Code of Ethics. Our firm's Code of Ethics requires adherence to rigorously high standards of business conduct and compliance with federal securities laws. This Code of Ethics is based on the principle that all IARs, and certain other persons, have a fiduciary duty to place the interests of clients ahead of their own.

This Code of Ethics applies to all of our IARs. Our IARs must avoid activities, interests, and relationships that might interfere with making decisions that are in the best interests of investment advisory clients. When potential conflicts of interest may exist, it is the responsibility of the IARs to inform you that a potential conflict of interest exists. Unless otherwise consented to by you, IARs are prohibited from revealing information relating to the investment intentions, activities, or portfolios of investment advisory clients except to persons whose responsibilities require knowledge of such information.

Our Code of Ethics further includes the firm's policies and procedures for the review of quarterly securities transaction reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g. private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by calling us at (336) 715-3300.

## Item 12: Brokerage Practices

Within any of the discretionary asset management programs you may discuss reasonable restrictions on investments or, in some cases, select a substitute investment with your IAR. Restrictions must be agreed to by the Advisor in writing.

We do not maintain custody of your assets that we manage. Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer, trust company or bank. Financial Transparency does not have any related or affiliated broker-dealer. While the IAR may suggest an investment custodian and broker-dealer, you may direct brokerage and custody decisions. Financial Transparency has made arrangements to work with E\*TRADE Advisor Services (E\*TRADE) and Charles Schwab Corporation (Schwab) to provide clients with custodial services.

E\*TRADE and Schwab offer services to independent investment advisers which includes custody of securities, trade execution, clearance and settlement of transactions.

E\*TRADE enables us to obtain mutual funds without transaction charges and other exchange traded funds and stocks at nominal transaction charges. We are able to efficiently manage assets within model portfolios for clients within this platform. In some situations, clients will be able to benefit from E\*TRADE’s agreement with some mutual fund companies to allow clients to purchase “A” shares without paying a sales load.

Schwab does not charge client accounts separately for custodial services. Client accounts will be charged transaction fees, commissions or other fees on trades that are executed or settle into the client’s custodial account. Transaction fees are negotiated with Schwab and are generally discounted from customary retail commission rates. This benefits clients because the overall fee paid is often lower than would be otherwise.

E\*TRADE and Schwab may make certain research and brokerage services available at no additional cost to our firm. Research products and services provided by these custodians may include: research reports on recommendations or other information about particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making; and other products or services that provide lawful and appropriate assistance by E\*TRADE and Schwab to our firm in the performance of our investment decision-making responsibilities.

The custodians do not make client brokerage commissions generated by client transactions available for our firm’s use. The aforementioned research and brokerage services are used by our firm to manage accounts. Without this arrangement, our firm might be compelled to purchase the same or similar services at our own expense.

As part of our fiduciary duty to our clients, our firm will endeavor at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by our firm or our related persons creates a potential conflict of interest and may indirectly influence our firm’s choice of either E\*TRADE or Schwab as custodial recommendations. Our firm examined this potential conflict of interest when our firm chose to recommend these custodians and have determined that the recommendation is in the best interest of our firm’s clients and satisfies our fiduciary obligations, including our duty to seek best execution.

Our clients may pay custody fees, a transaction fee or commission to either E\*TRADE or Schwab that is higher than another qualified broker dealer might charge to effect the same transaction where our firm determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services provided to the client as a whole.

In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Although our firm will seek competitive rates, to the benefit of all clients, our firm may not necessarily obtain the lowest possible commission rates for specific client account transactions.

### **Soft Dollars**

The firm doesn't receive Soft dollar benefits in connection with client transactions.

### **Client Brokerage Commissions**

We do not acquire client brokerage commissions (or markups or markdowns). We do not direct client transactions to a particular broker-dealer in return for soft dollar benefits.

### **E\*TRADE Platform Clients**

Financial Transparency has no discretion or ability to select a broker-dealer to execute mutual fund transactions for client accounts held through E\*TRADE. For transactions in ETFs, however, Financial Transparency has discretion to select among the small number of broker-dealers that are available to use through the E\*TRADE platform.

As a general policy, Financial Transparency will execute ETF transactions for E\*TRADE accounts on an aggregated basis for each model, with each client account in the model receiving the same price.

Financial Transparency will block trades where possible when advantageous to clients. Blocking trades permits the trading of aggregate blocks of securities from multiple client accounts, so that transactions costs are shared equally and on a pro-rated basis between all accounts included in the block trade. This may allow us to execute equity trades in a timelier, more equitable manner, at an average share price.

As a fiduciary to you we work towards best execution. Best execution is not necessarily measured by the circumstances surrounding a single transaction but may be sought over time across multiple transactions. Some factors to consider in an evaluation of whether "best execution" is being provided is whether the execution is prompt and reliable, at favorable security prices, with reasonable commission rates and/or other transaction costs, and a number of other factors may also enter into the evaluation.

## **Item 13: Review of Accounts**

We review your account(s) periodically, and at least annually, depending on the asset management program that you are in. If you are in an asset management program, your account(s) will be reviewed quarterly, and you will receive a detailed report of account holdings and performance. Clients within the CMA program whose investment strategy includes mutual fund and exchange traded managers, will also receive a manager evaluation.

You will also receive quarterly reports from us and account statements from your qualified custodian. Please immediately report any difference in asset balance or investment holdings between our report and that of your qualified custodian.

Party responsible for reviewing accounts at Financial Transparency: Ms. Emily Keagle and the IAR.

Financial Transparency is responsible for assisting your IAR, and your IAR is the final arbiter in making performance evaluations and in determining the investment advice ultimately delivered to you.

## Item 14: Client Referrals and Other Compensation

The only client compensation that Financial Transparency receives is the annual advisory fee we charge you, and any insurance commission earned, as described in Item 5.

We have outlined in Item 12 of this brochure the arrangements that have been disclosed with E\*TRADE and Schwab.

We may compensate individuals (for example, CPAs, attorneys) with whom we have a solicitation agreement according to, in compliance with Rule 206(4)-3 of the Investment Advisers Act of 1940. The use of referral compensation may constitute a conflict of interest.

Financial Transparency works with your IAR in providing asset management services, therefore, your IAR will receive a percentage of the annual advisory fee charged, directly from us.

We may also provide asset management support services to other registered investment advisory firms, and would be compensated by those advisory firms. This service is separate from any services that we provide to clients, and does not change any Financial Transparency client fee. The time spent on these services could be considered a conflict of interest to Financial Transparency clients. We endeavor to mitigate this conflict by periodically evaluating the number of support staff needed to provide a high level of service to all clients.

## Item 15: Custody

The SEC deems that any advisers that have the ability to directly debit advisory fees do, in effect, have custody of client assets. We, therefore, are deemed to have custody of your assets because of our ability to debit your quarterly advisory fee from your accounts.

We are also deemed to have custody over the funds and securities of trust accounts for any advisory affiliate that acts as trustee. Financial Transparency will follow the requisite safeguards for this form of custody.

## Item 16: Investment Discretion

If we accept discretionary authority over your accounts or investment decisions, a written advisory agreement would be required between you, the IAR, and us. Any limitations a client would place on our authority would be required to be outlined.

## Item 17: Voting Client Securities

You retain the right to vote all proxies that are solicited for securities held in your account. The IAR is expressly prohibited from voting proxies for securities held in your account and will not take any action or render advice with respect to the voting of proxies. You will receive proxies or other solicitations directly from the custodian or transfer agent.

## Item 18: Financial Information

We do not require or solicit payment of fees more than six months in advance of services rendered. Therefore, we are not required to provide a balance sheet of our most recent fiscal year. The SEC requires we report if we have been the subject of a bankruptcy petition during the last 10 years. We have never been the subject of such a proceeding. Financial Transparency is not subject to any financial condition that is reasonably likely to impair our ability to meet our commitments to you.