

# **Mystic Asset Management, Inc.**

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## **FORM ADV PART 2A BROCHURE**

This brochure provides information about the qualifications and business practices of Mystic Asset Management. If you have any questions about the contents of this brochure, contact us at 866-206-5272. 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 Mystic Asset Management is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Mystic Asset Management is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

## **Item 2 Material Changes**

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

There have been no material changes to our firm brochure since our last annual updating amendment dated March 8, 2019.

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## **Item 4 Investment Advisory Business**

### **Firm Description**

Mystic Asset Management, Inc. (the "Firm") is an investment advisor that specializes in providing comprehensive financial counseling services designed to meet personal and/or corporate needs. The Firm provides highly personalized discretionary and non-discretionary continuous and ongoing investment advisory services to individuals, corporations, trusts, sole proprietors, partnerships and pension & profit sharing plans.

The Firm's principals are affiliated with a Broker/Dealer; however, no equity transactions are executed on behalf of investment advisory clients for a commission. Through the Firm's relationship with the Broker/Dealer, the Firm has the ability to offer 401K retirement plans, 529 college plans, other types of pension and profit sharing plans, annuities, insurance products, limited partnerships, private placements, 1031 exchanges and other products to clients. If a commission is involved, it is fully disclosed to the client.

The Firm has relationship with other professionals in which they compensate for client referrals. The Firm follows Rule 206(4)-(3) of the Investment Advisors Act, which outlines the disclosure requirements of a solicitor.

The initial meeting with a client is usually free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

### **Principal Owner**

MAM - David Allaire and Sam Pappas each own 50%

### **Types of Advisory Services**

The Firm provides advisory services (also known as asset management services) on a discretionary and non-discretionary basis and other services.

#### *Advisory Services*

The firm manages client assets in a discretionary or non-discretionary capacity.

The goal of the initial meeting with the client is to identify the issues and concerns that are important to the client, then design and implement the path to reach those goals. A client's goals may be focused on a single issue, such as college funding or investment management, or comprehensive, encompassing all areas of a client's financial affairs.

In providing advisory services, the Firm may review and discuss a variety of financial issues, including asset allocation and providing repositioning recommendations; strategic tax planning; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; and education planning with funding recommendations.

The firm develops a diversified portfolio tailored to meet each client's specific needs while taking into consideration risk tolerances and goals. All aspects of the client's financial affairs are reviewed, including those of their children. Realistic and measurable goals are set and objectives to reach those goals may be defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

#### *Other Services*

On more than an occasional basis, The Firm furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

#### **Tailored Relationships**

The goals and objectives for each client are documented in our client files or by discussions with clients directly. Additionally, where requested, Investment policy statements are created that reflect the stated goals and objective of that client. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

#### **Termination of Agreement**

A Client may terminate any of the aforementioned agreements upon ten (10) or (30) days written notice (depending on the contract) to the Firm and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, The Firm will refund any unearned portion of the advance payment.

The Firm may terminate any of the aforementioned agreements upon ten (10) or (30) days written notice to the client. If the client made an advance payment, The Firm will refund any unearned portion of the advance payment.

#### **Assets Under Management**

As of December 31, 2019, we provide management services for \$222,987,456 in client assets on a discretionary basis, and \$4,864,530 in client assets on a non-discretionary basis.

### **Item 5 Fees and Compensation**

#### **Description**

The fee for a financial plan may be fixed or hourly and is predicated upon the facts known at the start of the engagement and priced according to the degree of complexity associated with the client's situation. There is no minimum fee; the fee is negotiable between client and advisor. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary for up to one month. Follow on implementation work is billed separately at the rate of \$125.00 per hour.

The Firm may also provide planning services on an annual retainer basis or based on an hourly fee for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$125.00, but is negotiable.

### **Advisory Services**

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship.

The annual Advisory Service Agreement fee is based on a percentage of the investable assets. Currently, there are several sliding fee scales employed by the Firm. An example of a fee schedule is provided below:

1.00% on the first \$1,000,000  
0.90% on the next \$1,000,000  
0.85% on the next \$1,000,000  
0.75% in excess of \$3,000,000

The representative that you are working with will be able to provide you the fee schedule that they are utilizing and the exact fee will be specified in your investment advisory contract.

The Firm reserves the right to employ a minimum fee, which would be fully disclosed and discussed with the client and in writing. The Firm, in its sole discretion, may waive its minimum fee and/or charge a lesser or higher investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.). Fees are negotiable and current client relationships exist where the fees are higher or lower than the fee schedule above.

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed or if the account is billed in advance, fees will be returned to client on a pro rata basis.

### **Fee Billing**

Advisory service fees are billed monthly or quarterly, in *ADVANCE* or *ARREARS*, meaning that we invoice you *BEFORE* or *AFTER* the three-month or month billing period has *BEGUN* or *ENDED*. Payment in full is expected upon invoice presentation. Fees are usually deducted from a client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

### **Other Fees**

Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. Additionally, custodians may charge fees for services other than investment related, i.e., overnight mail, wires, debit cards, checking, account setup fees, account termination fees, etc.

The firm does not share or receive any of the aforementioned fees nor any of the fees/commissions as a result of any equity purchases or sales executed through TD Ameritrade. However, the Firm utilizes outside bond securities dealers to supplement the bond departments of our current custodians resulting in additional compensation for Firm representatives (see disclosure under Item 10).

### **Expense Ratios**

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

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

### **Past Due Accounts and Termination of Agreement**

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

### **Compensation for the Sale of Securities or Other Investment Products**

Certain advisory representatives with our Firm are registered representatives with ISC Group, Inc. (ISC), a securities broker-dealer, and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation and/or are Investment adviser representatives with the Firm The Retirement Planning Company of New England, Inc. In their capacity as registered representatives and/or investment adviser representatives these persons will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by these persons in their capacities as registered representatives and/or investment adviser representatives are separate and in addition to our advisory fees.

Similarly, certain advisory representatives of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to the Firm's advisory fees.

This receipt of commission-based compensation presents a conflict of interest because persons providing advice on behalf of our firm have an incentive to recommend investment or insurance products based on the compensation received; however, our endeavor at all times is to place your

interests first when making recommendations regarding insurance and investments. Moreover, you are under no obligation, contractually or otherwise, to purchase securities or insurance products through any person affiliated with the Firm.

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

### **Sharing of Capital Gains**

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

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

## **Item 7 Types of Clients**

### **Description**

The Firm generally provides investment advice to individuals, banks or thrift institutions, investment companies, pension and profit sharing plans, trusts, estates, nonprofit and charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

### **Account Minimums**

The minimum account size is \$500,000 of assets under management, which equates to an annual fee of \$5,000 based on the aforementioned fee schedule.

The Firm has the discretion to waive the account minimum. Other exceptions will apply to employees of The Firm and their relatives, or relatives of existing clients.

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

### **Methods of Analysis and Investment Strategies**

Assets are invested primarily in individual stocks and bonds. Additionally, the Firm may use mutual funds and exchange-traded funds.

Securities may also include, but not limited to: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U.S. government securities, options contracts, futures contracts, and interests in partnerships.

The Firm does not have access to Initial public offerings (IPOs). IPO's will be allocated based on suitability and cash availability in client accounts.

The investment strategy will vary by client depending on what the client's objectives and goals are.

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.



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

### **Risk of Loss**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of 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.

### **Item 9 Disciplinary Information**

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

## **Item 10 Other Financial Industry Activities and Affiliations**

### **Registrations with Broker-Dealer**

Several of the Firm's representatives are registered representatives of ISC Group, Inc. (ISC), member FINRA/SIPC, a non-affiliated Broker Dealer. The Firm utilizes ISC to supplement the bond department of TD Ameritrade. The purchase of bonds through ISC in many circumstances will result in direct compensation to the representatives of the Firm. This compensation is in addition to the asset management fee assessed to the client. The possibility of receiving additional compensation from selling securities to a customer provides an economic incentive for a Representative or employee to recommend these products based on the compensation to be received rather than on a customer's investment needs. This conflict is mitigated by a variety of factors, including the following: (1) the Firm will always attempt to purchase a fixed income security (bond) for the client at the most favorable final price to the client, (2) the Firm's fiduciary obligations to act in the best interest of its clients, (3) Employees' duty to honor the Code of Ethics, which prohibit firm personnel from acting in such a manner as to promote their own interests over those of the client, (4) the Firm's obligation to periodically review client accounts and best execution, and (5) the Firm's commitment not to place its interests or those of any of its related persons before its clients' interests when providing investment management services.

### **Registrations with Investment Adviser**

The Firm's representatives are also registered as investment adviser representatives. See the *Fees and Compensation* section in this brochure for more information on the compensation received by investment adviser representatives who are affiliated with our firm.

### **Arrangements with Affiliated Entities**

The Firm is affiliated with The Retirement Planning Company of New England, Inc. through common control and ownership. It may recommend that you use the services of the Firm's affiliate if appropriate and suitable for your needs. The Firm's advisory services are separate and distinct from the fees paid to our affiliate for their services.

Referral arrangements with an affiliated entity present a conflict of interest for us because we may have a direct or indirect financial incentive to recommend an affiliated firm's services. While the Firm believes that compensation charged by an affiliated firm is competitive, such compensation may be higher than fees charged by other firms providing the same or similar services. You are under no obligation to use the services of any firm we recommend, whether affiliated or otherwise, and may obtain comparable services and/or lower fees through other firms.

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

### **Code of Ethics**

The employees of The Firm have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

## **Participation or Interest in Client Transactions**

The Firm and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the Firm's *Compliance Manual*.

## **Personal Trading**

The Chief Compliance Officer of The Firm is Sam Pappas. He reviews all employee trades each quarter. His trades are reviewed by David Allaire. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment.

## **Item 12 Brokerage Practices**

### **Selecting Brokerage Firms**

The Firm recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates. The Firm currently recommends TD Ameritrade to its clients. TD Ameritrade charges a fee for stock and bond trades. While the Firm receives some benefits from TD Ameritrade as described below, the Firm and its representative do not receive fees or commissions from transactions placed through TD Ameritrade.

The Firm utilizes outside bond securities dealers to supplement the bond department of TD Ameritrade where the Firm can achieve a better price for the Firm's clients. The purchase of bonds from outside bond securities dealers in many circumstances will result in direct compensation to Firm representatives. This compensation would be in addition to the asset management fee assessed to the client. See Item 10 for a discussion of conflicts related to these transactions.

The Firm participates in institutional advisor program (the "Program") offered by TD Ameritrade Institutional ("TD"). TD is a division of TD Ameritrade, Inc., member FINRA/SIPC/NFA, ("TD Ameritrade") an unaffiliated SEC-registered broker dealer and FINRA member. TD offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. The Firm receives some benefits from TD through its participation in the Program.

As disclosed above, the Firm participates in TD Ameritrade's institutional customer program and may recommend TD to clients for custody and brokerage services. There is no direct link between the Firm participation in the program and investment advice it gives to its Clients, although the Firm receives economic benefits through its participation in the program that are not available to TD retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving the Firms participants; access to block trading; the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees; research, technology and practice management products or services provided to the Firm by third party vendors. Some of the products and services made available by TD may benefit the Firm but may not benefit its Clients. Generally these products or services benefit the Firm in managing and administering Client Accounts, including accounts not maintained at TD. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transaction directed to TD. As part of its fiduciary duties to clients, the Firm endeavors at

all times to put the interests of its clients first. Clients should be aware, however, that receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD for custody and brokerage services.

### **Soft Dollars**

Advisor does not receive any "soft dollar benefits" in connection with client securities transactions. Advisor, however, does receive from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment Advisors participating in the program. Specifically, the Additional Services include Sales Force CRM, which is used for client management; Back Office Support Service, which is used for portfolio management and reporting. TD Ameritrade provides the Additional services to Advisor in its sole discretion and at its own expense, and Advisor does not pay any fees to TD Ameritrade for the Additional Services. Advisor and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services.

Advisor's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to Advisor, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, Advisor's Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with Advisor, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, Advisor may have an incentive to recommend to its clients that the assets under management by Advisor be held in custody with TD Ameritrade and to place transactions for Clients accounts with TD Ameritrade. Advisor's receipt of Additional Services does not diminish its duty to act in the best interest of its Clients, including to seek best execution of trades for client accounts.

### **Order Aggregation**

Whenever possible trades are aggregated for clients provided there is a benefit.

## **Item 13 Review of Accounts**

The Firm meets with clients at least annually to conduct a formal account review. More frequent internal reviews occur, but are not necessarily communicated to the client unless changes to investment strategy are recommended. Additionally, we are always available to speak to clients anytime they call, email or fax us.

### **Periodic Reviews**

Account reviews are performed quarterly by representatives of the Firm. However, individual holdings are reviewed on a continuous basis. Without question, 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**

Clients receive periodic communications; *Investment Management* clients may receive written quarterly updates. The written updates may include a portfolio report with sector diversifications.

## **Item 14 Client Referrals and Other Compensation**

### **Incoming Referrals**

The Firm 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. Additionally, The Firm has arrangements with specific individuals where it compensates for referrals.

### **Referrals Out**

The Firm does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

### **Other Compensation**

*Not applicable*

## **Item 15 Custody**

The Firm does not act as a custodian of client assets. An independent third party custodian is utilized and the Firm places trades for clients under a limited power of attorney. Additionally, the Firm has the ability to collect its investment advisory fees directly from the client's account. Currently, TD Ameritrade is the primary custodian recommended to clients. Other custodians can be used; however, should another custodian be utilized, it can impact the reporting on the account.

### **Account Statements**

All assets are held at a qualified custodian, which means 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 performance report statements provided by The Firm.

### **Net Worth Statements**

Clients may be provided net worth statements and net worth graphs that are generated from our client relationship management system.

## **Item 16 Investment Discretion**

### **Discretionary Authority for Trading**

The Firm accepts discretionary authority to manage securities accounts on behalf of clients. The Firm has 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. However, some clients prefer the Firm consults with them prior to each trade.

The client approves the custodian to be used. The Firm does not receive any portion of the transaction fees or commissions paid by the client to the custodian on trades.

Discretionary trading authority facilitates placing trades in client accounts on your behalf so that we may promptly implement the investment policy that was discussed.

### **Limited Power of Attorney**

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

## **Item 17 Voting Client Securities**

### **Proxy Votes**

The Firm does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, The Firm will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

## **Item 18 Financial Information**

The Firm 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 The Firm 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.

## **Item 19 Other Information**

### **Business Continuity Plan**

The Firm has an evolving Business Continuity Plan that provides steps to mitigate and recover from the loss of office space, communications, services or key people.

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornadoes, and flooding. The Plan also covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, communications line outage, Internet outage, railway accident and aircraft accident. Currently, electronic files are backed up daily/weekly and archived offsite.

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

The Firm has several Key personal. It is expected that if there was a loss of a key personal, the other(s) would step in.

### **Information Security Program**

The Firm maintains an information security program (firewall) to reduce the risk that your personal and confidential information may be breached.

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

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

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

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

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

We will notify you in advance if our privacy policy is expected to change.