

ENTRUST FINANCIAL LLC®

a Registered Investment Adviser

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This brochure provides information about the qualifications and business practices of Entrust Financial LLC® (hereinafter “Entrust Financial” or the “Firm”). If you have any questions about the contents of this brochure, please contact the Firm at this telephone number listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Additional information about the Firm is available on the SEC’s website at www.adviserinfo.sec.gov. The Firm is a registered investment adviser. Registration does not imply any level of skill or training.

Item 2. Material Changes

In this Item, Entrust Financial is required to discuss any material changes that have been made to this brochure since the Firm's last annual update, which was filed in March 2019. Material changes since then are:

January 2020: Financial planning fees have changed to a minimum fixed fee of \$3500. Entrust personnel no longer offer insurance products on a commission basis.

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Item 4. Advisory Business

Entrust Financial offers a variety of advisory services, which include financial planning, consulting, and investment management services. Prior to Entrust Financial rendering any of the foregoing advisory services, clients are required to enter into one or more written agreements with Entrust Financial setting forth the relevant terms and conditions of the advisory relationship (the “Advisory Agreement”).

Entrust Financial began conducting advisory business in March 2015 and is majority owned by Joslyn G. Ewart and McKenzie J. Frankel. As of December 31, 2019, the Firm had approximately \$168,397,420 in assets under management, of which \$155,173,389 was managed on a discretionary basis and \$13,224,031 was managed on a non-discretionary basis.

While this brochure generally describes the business of Entrust Financial, certain sections also discuss the activities of its Supervised Persons, which refer to the Firm’s officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees or any other person who provides investment advice on Entrust Financial’s behalf and is subject to the Firm’s supervision or control.

Financial Planning and Consulting Services

Entrust Financial offers clients a broad range of financial planning and consulting services, which include any or all of the following functions:

- | | |
|-----------------------------|-------------------------|
| • Business Planning | • Retirement Planning |
| • Cash Flow Forecasting | • Risk Management |
| • Trust and Estate Planning | • Charitable Giving |
| • Financial Reporting | • Distribution Planning |
| • Investment Consulting | • Tax Planning |
| • Insurance Planning | • Manager Due Diligence |

While each of these services is available on a stand-alone basis, certain of them may also be rendered in conjunction with investment portfolio management as part of a comprehensive wealth management engagement (described in more detail below).

In performing these services, Entrust Financial is not required to verify any information received from the client or from the client’s other professionals (e.g., attorneys, accountants, etc.) and is expressly authorized to rely on such information.

Clients retain absolute discretion over all decisions regarding implementation and are under no obligation to act upon any of the recommendations made by Entrust Financial under a financial planning or consulting engagement. Clients are advised that it remains their responsibility to promptly notify the

Firm of any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising Entrust Financial's recommendations and/or services.

Investment and Wealth Management Services

Entrust Financial manages client investment portfolios on a discretionary and non-discretionary basis. In addition, Entrust Financial offers wealth management services to clients, which generally include a broad range of comprehensive financial planning and consulting services as well as discretionary management of investment portfolios.

Entrust Financial primarily allocates client assets among various mutual funds, exchange-traded funds ("ETFs"), and independent investment managers ("Independent Managers"), in accordance with each client's stated investment objectives.

Where appropriate, the Firm also provides advice about any type of legacy position or other investment held in client portfolios. Clients may engage Entrust Financial to manage and/or advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance and annuity contracts and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, Entrust Financial directs or recommends the allocation of client assets among the various investment options available with the product or plan. These assets are generally maintained at the underwriting insurance company or the custodian designated by the product's (or plan's) provider.

Entrust Financial tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. Entrust Financial consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of their portfolios. Clients are advised to promptly notify Entrust Financial if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients may impose reasonable restrictions or mandates on the management of their accounts if Entrust Financial determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts.

Use of Independent Managers

As mentioned above, Entrust Financial may select certain Independent Managers to actively manage a portion of its clients' assets. The specific terms and conditions under which a client engages an Independent Manager are set forth in a separate written agreement with the designated Independent Manager. In addition to this brochure, clients should also receive the written disclosure documents of the respective Independent Managers engaged to manage their assets.

Entrust Financial evaluates a variety of information about Independent Managers, which includes the Independent Managers' public disclosure documents, materials supplied by the Independent Managers themselves and other third-party analyses it believes are reputable. To the extent possible, the Firm seeks to assess the Independent Managers' investment strategies, past performance and risk results in relation to its clients' individual portfolio allocations and risk exposure. Entrust Financial also takes into consideration each Independent Manager's management style, returns, reputation, financial strength, reporting, pricing and research capabilities, among other factors.

Entrust Financial continues to provide services relative to the discretionary selection of the Independent Managers. On an ongoing basis, the Firm monitors the performance of those accounts being managed by Independent Managers. Entrust Financial seeks to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests.

Item 5. Fees and Compensation

Entrust Financial offers services on a fee basis, which may include fixed and/or hourly fees, as well as fees based upon assets under management or advisement. Additionally, certain of the Firm's

Financial Planning and Consulting Fees

Entrust Financial generally charges a fixed and hourly fee for providing financial planning and consulting services under a stand-alone engagement. These fees are negotiable, with a minimum fixed fee of \$3500 and thereafter at \$350 on an hourly basis, depending upon the scope and complexity of the services and the professional rendering the financial planning and/or the consulting services.

The terms and conditions of the financial planning and/or consulting engagement are set forth in the Advisory Agreement and Entrust Financial generally requires one-half of the fee payable upon execution of the Advisory Agreement. The outstanding balance is generally due upon delivery of the financial plan or completion of the agreed upon services which under normal circumstances is within six months.

Investment and Wealth Management Fees

Entrust Financial offers investment and/or wealth management services for an annual fee based on the amount of assets under the Firm's management. This management fee is generally determined in accordance with the following fee schedule:

PORTFOLIO VALUE	BASE FEE
\$ 500,000 - \$1,000,000	1.10%
\$1,000,001 - \$5,000,000	0.90%
\$5,000,001 - \$10,000,000	0.75%
Greater than \$10,000,000	0.50%

The annual fee is prorated and charged quarterly (at $\frac{1}{4}$ of the annual fee), in advance, based upon the average daily market value of the assets being managed by Entrust Financial during the previous quarter as reported by the account custodian. Accounts of the same family are usually combined in order to attain a lower fee than if accounts were billed separately. The fee is then applied to each account on a *pro rata* basis according to its assets under management as a fraction of the family total for that period.

For the initial period of an engagement, the fee is calculated on a *pro rata* basis which is calculated according to the actual number of days the assets were under management and is normally charged at the close of the initial quarter in arrears. Deposits and withdrawals from the managed accounts(s) are charged based on the number of days the assets were in the account over the actual number of days in the quarter. In the event the Advisory Agreement is terminated, the fee for the final billing period is prorated (using the actual number of days the assets were under management over the actual number of days in the quarter) through the effective date of the termination and the unearned portion of the fee is refunded to the client, as appropriate.

Additionally, for asset management services the Firm provides with respect to certain client holdings (e.g., held-away assets, accommodation accounts, alternative investments, etc.), Entrust Financial may negotiate a fee rate that differs from the schedule set forth above.

Additional Fees and Expenses

In addition to the advisory fees paid to Entrust Financial, clients will also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively “Financial Institutions”). Examples of these additional charges include securities brokerage commissions, transaction fees, custodial fees, fees charged by the Independent Managers, margin costs, charges imposed directly by a mutual fund or ETF in a client’s account, as disclosed in the fund’s prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. The Firm’s brokerage practices are described at length in Item 12, below.

Direct Fee Debit

Clients generally provide Entrust Financial and/or certain Independent Managers with the authority to directly debit their accounts for payment of the investment advisory fees. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to Entrust Financial.

Account Additions and Withdrawals

Clients may make additions to and withdrawals from their account at any time, subject to Entrust Financial's right to terminate an account. Additions may be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or declines to accept particular securities into a client's account. Clients may withdraw account assets on notice to Entrust Financial, subject to the usual and customary securities settlement procedures. However, the Firm generally designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives. Entrust Financial may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, short-term redemption fees, fees assessed at the mutual fund level (e.g., contingent deferred sales charges) and/or tax ramifications.

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

Entrust Financial does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client's assets).

Item 7. Types of Clients

Entrust Financial offers services to individuals, trusts, estates, pension and profit sharing plans, charitable organizations, corporations and business entities.

Minimum Account Requirements

As a condition for starting and maintaining an investment management relationship, Entrust Financial generally imposes a minimum portfolio value of \$750,000. It is possible that certain clients incur an effective fee rate that is higher than the Firm's stated fee schedule. Entrust Financial may, in its sole discretion, elect to waive its minimum account requirements based upon certain criteria, including anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, and pro bono activities.

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

Methods of Analysis

Entrust Financial primarily engages in fundamental analysis when determining the asset allocation of client portfolios. Fundamental analysis involves an evaluation of the fundamental financial condition and competitive position of a particular fund or issuer. For Entrust Financial, this process typically involves an analysis of an issuer's management team, investment strategies, style drift, past performance, reputation and financial strength in relation to the asset class concentrations and risk exposures of the Firm's model asset allocations. A substantial risk in relying upon fundamental analysis is that while the overall health and position of a company may be good, evolving market conditions may negatively impact the security.

Investment Strategies

Entrust Financial manages client assets on a discretionary basis. Entrust Financial primarily allocates client assets among various mutual funds, exchange-traded funds ("ETFs"), and Independent Managers in accordance with the client's stated investment objectives. The Firm also offers alternative investments on the Schwab platform.

Entrust Financial tailors its advisory services to the individual needs of clients. Entrust Financial's investing process centers around five steps:

1. Assess client goals and circumstances. The investment plan process begins with a discussion on client financial values and goals, as well as existing assets, and interests.
2. Set long-term investment objectives. Taking into account the long-term nature of successful investing, Entrust Financial sets objectives for client portfolios that are appropriate for clients' willingness, ability and need to take risk, and the identified investment horizon.
3. Plan the asset allocation. Asset allocation is the first investment decision. During this process, Entrust Financial will formulate how much of the client portfolio to invest in each of the different investment types, or asset classes, including stocks, bonds and short-term investments, both domestic and foreign.
4. Select the investment approach. With an asset allocation in place, Entrust Financial selects the investment vehicles that will be used to implement the client portfolio strategy. Two key investing principles guide these decisions: the importance of diversification and the value of remaining invested.

5. Build the portfolio. Building on the first four steps, Entrust Financial seeks to construct a portfolio suited for client needs, goals, investment horizon and risk attitude. The building blocks for the portfolio typically are institutional asset class funds. In the event that an institutional asset class fund is not appropriate, retail no-load funds, ETFs, Investment Managers, and/or individual securities may be used.

In addition to the above considerations, these recommendations take into account portfolio costs as well as the potential tax impact of the restructuring.

When mutual funds are used to implement a portfolio, Entrust Financial chooses from mutual funds available through Charles Schwab & Co., Inc. (“Schwab”). Entrust Financial performs its own due diligence in the selection of these mutual funds which includes an analysis of transaction fees, redemption fees and internal expenses. Entrust Financial makes every effort to select funds and fund classes with the lowest cost to a client given assumptions of holding periods.

Risk of Loss

General Risk of Loss

Investing in securities involves the risk of loss. Clients should be prepared to bear potential losses.

Market Risks

The profitability of a significant portion of Entrust Financial’s recommendations and/or investment decisions may depend to a great extent upon correctly assessing the future course of price movements of stocks, bonds and other asset classes. There can be no assurance that Entrust Financial will be able to predict those price movements accurately or capitalize on any such assumptions.

Mutual Funds and ETFs

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund’s underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund’s stated daily per share net asset value (“NAV”), plus any shareholder fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund’s holdings. The trading prices of a mutual fund’s shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund’s shares trading at a premium or discount to actual NAV.

Entrust Financial has invested in mutual funds managed by Dimensional Fund Advisors (“DFA”) on behalf of some of our clients. DFA requires pre-approval of investment advisors in order to allow them to purchase or hold DFA funds on behalf of their clients. Should a client holding DFA funds leave Entrust Financial for an investment firm not pre-approved by DFA, the DFA funds may need to be liquidated, possibly incurring loss and/or negative tax consequences.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed based ETFs and potentially more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 20,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

Alternative Investments

Alternative investments, including funds that invest in alternative investments, are risky and may not be suitable for all investors. Alternative investments often employ leveraging and other speculative practices that increase an investor's risk of loss to include complete loss of investment, often charge high fees, and can be highly illiquid and volatile. Alternative investments may lack diversification, involve complex tax structures and have delays in reporting important tax information.

Use of Independent Managers

As stated above, Entrust Financial may select certain Independent Managers to manage a portion of its clients' assets. In these situations, Entrust Financial continues to conduct ongoing due diligence of such managers, but such recommendations rely to a great extent on the Independent Managers' ability to successfully implement their investment strategies. In addition, Entrust Financial generally will not have the ability to supervise the Independent Managers on a day-to-day basis.

Item 9. Disciplinary Information

Entrust Financial has not been involved in any legal or disciplinary events that would be material to a client's evaluation of its advisory business or the integrity of its management.

Item 10. Other Financial Industry Activities and Affiliations

Entrust Financial has no other financial industry activities or affiliations to disclose.

Item 11. Code of Ethics

Entrust Financial has adopted a code of ethics in compliance with applicable securities laws (“Code of Ethics”) that sets forth the standards of conduct expected of its Supervised Persons. Entrust Financial’s Code of Ethics contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by the Firm or any of its Supervised Persons and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

The Code of Ethics also requires certain of Entrust Financial’s personnel to report their personal securities holdings and transactions and obtain pre-approval of certain investments (*e.g.*, initial public offerings, limited offerings). However, the Firm’s Supervised Persons are permitted to buy or sell securities that it also recommends to clients if done in a fair and equitable manner that is consistent with the Firm’s policies and procedures. This Code of Ethics has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by certain personnel to be completed without any appreciable impact on the markets of such securities. Therefore, under limited circumstances, exceptions may be made to the policies stated below.

When the Firm is engaging in or considering a transaction in any security on behalf of a client, no Supervised Person with access to this information may knowingly effect for themselves or for their immediate family (*i.e.*, spouse, minor children and adults living in the same household) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the Supervised Person is combined with a client trade, where both receive the same price, or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; money market instruments, bankers’ acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

Clients and prospective clients may contact Entrust Financial to request a copy of its Code of Ethics.

Item 12. Brokerage Practices

Recommendation of Broker/Dealers for Client Transactions

Entrust Financial generally recommends that clients utilize the custody, brokerage and clearing services of Schwab Advisor Services™ (“Schwab”). Factors which Entrust Financial considers in recommending Schwab or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. Schwab may enable the Firm to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by Schwab may be higher or lower than those charged by other Financial Institutions.

The commissions paid by Entrust Financial’s clients to Schwab comply with the Firm’s duty to obtain “best execution.” Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction where Entrust Financial determines that the commissions are reasonable in relation to the value of the brokerage and research services received. 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 Financial Institution’s services, including among others, the value of research provided, execution capability, commission rates and responsiveness. Entrust Financial seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker/dealers in return for investment research products and/or services which assist Entrust Financial in its investment decision-making process. Such research generally will be used to service all of the Firm’s clients.

Products and Services Available from Schwab

Entrust Financial is served by Charles Schwab’s Schwab Advisor Services, which is the business arm for investment advisory firms. Schwab provides investment advisors access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services.

Products and services that assist in managing and administering clients’ accounts include investment research, both Schwab’s own and that of third parties. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements);
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- Provide pricing and other market data;

- Facilitate payment of management fees from clients' accounts and
- Assist with back-office functions, recordkeeping and client reporting.

Schwab also offers other services intended to help the Firm manage and further develop business enterprise. These services include:

- Educational conferences and events;
- Technology, compliance, legal and business consulting;
- Publications and conferences on practice management and business succession and
- Access to employee benefits providers, human capital consultants and insurance providers.

Brokerage for Client Referrals

Entrust Financial does not consider, in selecting or recommending broker/dealers, whether the Firm receives client referrals from the Financial Institutions or other third party. Entrust does not receive referrals from Schwab.

Directed Brokerage

Some clients may choose to execute trades through broker/dealers with whom they have an existing relationship. In this instance, the Firm is less able to meet its fiduciary duty to obtain best execution for transactions executed for clients.

Trade Aggregation

Transactions for each client will be effected independently. The Firm does not aggregate client orders of securities simultaneously for more than one client ("block trades").

Item 13. Review of Accounts

Account Reviews

Entrust Financial monitors client portfolios on a continuous and ongoing basis while regular account reviews are conducted on at least a quarterly basis. Such reviews are conducted by the Firm's Investment Committee, which consists of Joslyn Ewart, CCO and Principal, McKenzie Frankel, CIO and Principal and Jennifer Bravo, Investment Advisor Representative. All investment advisory clients are encouraged to discuss their needs, goals and objectives with Entrust Financial and to keep the Firm informed of any changes thereto. The Firm contacts ongoing investment advisory clients at least annually to review its previous services and/or recommendations and quarterly to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Account Statements and Reports

Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions where their assets are custodied. From time-to-time or as otherwise requested, clients will also receive written or electronic reports from Entrust Financial and/or an outside service provider, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. Clients should compare the account statements they receive from their custodian with any documents or reports they receive from Entrust Financial or an outside service provider.

Item 14. Client Referrals and Other Compensation

Client Referrals

The Firm does not currently provide compensation to any third-party solicitors for client referrals.

Other Economic Benefits

In addition, Entrust Financial is required to disclose any relationship or arrangement where it receives an economic benefit from a third party (non-client) for providing advisory services. This type of relationship poses a conflict of interest and any such relationship is disclosed in response to Item 12, above.

Item 15. Custody

The Advisory Agreement and/or the separate agreement with any Financial Institution generally authorize Entrust Financial and/or the Independent Managers to debit client accounts for payment of the Firm's fees and to directly remit that those funds to the Firm in accordance with applicable custody rules.

The Financial Institutions that hold client assets are qualified custodians, sending clients at least quarterly statements. These statements show the deduction of Entrust Financial's fees if the client has granted the custodian permission to act on Entrust Financial's fee instructions. This deduction of fees has been deemed to be a form of custody for Entrust Financial over client accounts.

Additionally, some clients have provided their custodian with standing instructions for Entrust to move assets from their account(s) to accounts of third parties. (This includes sending Required Minimum Distributions from an individual's IRA account to an account held jointly with a spouse or partner.) Because these standing instructions do not specify the amount or timing of the transfers, Entrust is also deemed to have custody over the sending accounts. This is mitigated by Entrust and the custodian following appropriate custody rules, which do not require that the sending accounts be surprise examined annually by a public accounting firm.

Item 16. Investment Discretion

Entrust Financial may be given the authority to exercise discretion on behalf of clients. Entrust Financial is considered to exercise investment discretion over a client's account if it can effect and/or direct transactions in client accounts without first seeking their consent. Entrust Financial is given this authority through a limited power-of-attorney included in the agreement between Entrust Financial and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). Entrust Financial takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold;
- When transactions are made; and
- The Independent Managers to be hired or fired.

Item 17. Voting Client Securities

Entrust Financial does not accept the authority to vote a client's securities (i.e., proxies) on their behalf. Clients receive proxies directly from the Financial Institutions where their assets are held and may contact the Firm at the contact information on the cover of this brochure with questions about any such issuer solicitations.

Item 18. Financial Information

As an SEC registered advisor, Entrust Financial is not required to disclose any financial information.