

## **Item 1 – Cover Page**

### **Bazis Young Investment Group LLC**

14301 FNB Parkway, Suite 100  
Omaha, NE. 68154  
(402) 965-3334

4870 Sadler Road, Suite 300  
Glen Allen, VA  
(844) 303-1531

[www.bazisyoun.com](http://www.bazisyoun.com)  
[www.bazisyounwealthplan.com](http://www.bazisyounwealthplan.com)

### **Wrap Fee Program Brochure**

**Date of Brochure: September 2020**

---

This wrap fee program brochure provides information about the qualifications and business practices of Bazis Young Investment Group LLC. If you have any questions about the contents of this brochure, please contact Duane R. Bazis Jr. at (402) 965-3334. 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 Bazis Young Investment Group LLC is also available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

\*Registration as an investment advisor does not imply a certain level of skill or training.

## Item 2 – Material Changes

Since our last annual amendment was filed in February 2020, the following change has been made to this brochure:

- In July 2020, the firm moved its main office location to the address listed on the cover page of the Disclosure Brochure.
- In June 2020, the firm changed the official business name to Bazis Young Investment Group LLC.
- In June 2020, the firm added a more detailed explanation of our fee billing requirements. Please refer to **Item 4 – Services, Fees and Compensation** for more specific information.

We will ensure that you receive a summary of material changes, if any, to this and subsequent disclosure brochures within 120 days after our fiscal year ends. Our fiscal year ends on December 31, so you will receive the summary of material changes, if any, no later than April 30 each year. At that time, we will also offer a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

### Item 3 – Table of Contents

|  |    |
|--|----|
| Item 1 – Cover Page .....  | 1  |
| Item 2 – Material Changes .....                                  | 2  |
| Item 3 – Table of Contents .....                                 | 3  |
| Item 4 – Services, Fees and Compensation .....                   | 4  |
| Item 5 – Account Requirements and Types of Clients .....         | 7  |
| Minimum Investment Amounts Required .....                        | 7  |
| Types of Accounts .....  | 8  |
| Item 6 – Portfolio Manager Selection and Evaluation .....        | 8  |
| Types of Advisory Services .....                                 | 8  |
| Limits Advice to Certain Types of Investments .....              | 8  |
| Tailor Advisor Services to Individual Needs of Clients .....     | 9  |
| Performance-Based Fees .....                                     | 9  |
| Methods of Analysis .....  | 9  |
| Fundamental .....  | 9  |
| Charting .....   | 10 |
| Primary Method of Analysis or Strategy .....                     | 10 |
| Investment Strategies .....                                      | 10 |
| Risk of Loss .....   | 10 |
| Voting Client Securities .....                                   | 12 |
| Item 7 – Client Information Provided to Portfolio Managers ..... | 12 |
| Item 8 - Client Contact with Portfolio Managers .....            | 12 |
| Item 9 - Additional Information .....                            | 12 |
| Disciplinary Information .....                                   | 12 |
| Other Financial Industry Activities and Affiliations .....       | 13 |
| Insurance Sales .....  | 13 |
| Code of Ethics .....   | 13 |
| Participation in Client Transactions and Personal Trading .....  | 14 |
| Account Reviews .....  | 14 |
| Account Reports .....  | 14 |
| Client Referrals .....   | 14 |
| Other Compensation .....   | 14 |
| Financial Information .....                                      | 14 |
| Item 10 - Privacy Policy .....                                   | 14 |

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

Bazis Young's asset management services are provided via our Private Portfolio Management Program (PPM) services and our Private Wealth Management (PWM) services

Our PPM program provides continuous and ongoing asset management and supervision over your specified accounts.

For clients with at least \$5 Million in assets under management with our firm we offer the Private Wealth Management Program, an exclusive program that bundles our Asset Management services with our Financial Planning and Consulting services.

Qualified clients will receive:

- Full financial plan, with retirement cash flow, asset allocation, estate planning review, life insurance evaluation, retirement plan analysis, executive stock option review, tax advantaged strategies, 529 college saving plans, charitable giving, legacy planning, balance sheet/lending strategies, trust accounts and administrative guidance, and the capability to do financial modeling using sophisticated Monte Carlo simulation and "what if" scenarios.
- Access to a customized, secure, personal, and private website to aggregate and analyze performance of assets relative to your financial plan, regardless of where they are located. This enables clients the convenience of one sign-on showing the value of all networked assets in one place; including: 401k, IRA, bank accounts, loans, real estate values, and business values.
- Ability to upload and store documents securely.
- Attorney and CPA can have viewing access to help coordinate your family planning.
- Access to alternative investments including Hedge Funds, and Private Equity Funds.
- Private Portfolio Management; using either discretion or non-discretion.

The Private Portfolio Management Program ("PPM") and Private Wealth Management Program are wrap-fee programs through which Bazis Young Investment Group LLC ("Advisor" or "we") provide investment supervisory services to clients and prospective clients ("clients" or "you"). Our investment supervisory services include giving continuous advice to you and making investments based on your individual needs. PPM and PWM services are provided on both a discretionary and non-discretionary basis. On a discretionary basis, we make all decisions to buy, sell or hold securities, cash or other investments in the managed account in our sole discretion without consulting with you before making any transactions. You must provide us with written authorization (through the specific program Investment Management Agreement) to exercise this discretionary authority. You can place reasonable restrictions and limitations on the discretionary authority. If asset management services are provided on a non-discretionary basis, this means that we always contact you before implementing any transactions in an account.

Our Asset management services are designed to provide a disciplined advisory approach to meet your objectives and needs. The portfolio managers develop disciplined portfolios based on your investment objectives and individual needs as established in the initial client interview. To develop our investment management discipline, we rely on quantitative research and fundamental research obtained from third-

party sources. Our sources of information include financial newspapers and magazines, inspection of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses and filings with the SEC and company press releases. When managing assets, strategies can be employed that include both long term (securities held at least a year) and short term (securities sold within a year) purchases of securities and, depending on your objectives, supplemental covered option writing. However, in special circumstances the strategies may also include margin transactions, other option strategies, and trading (securities sold within 30 days) or short sale transactions. If margin is used in your account, you should be aware that the margin balance will not be included in the asset under management total used to calculate advisory fees. Using margin is not suitable for all investors since it increases leverage in the client's account and, therefore, its risk.

After you sign the Investment Management Agreement, we assist you in establishing one or more brokerage accounts ("account") through which all transactions are implemented and processed.

For our PPM program we require a minimum initial account value of \$1,000,000, although the minimum may be waived under certain circumstances (i.e., potential additional deposits, family relationships, referral sources, etc.).

For our PWM program we require a minimum of \$5 Million in assets under management with our firm.

Brokerage transactions are processed and cleared by either LPL Financial member FINRA and SIPC or TD Ameritrade Institutional a division of TD Ameritrade, Inc. member FINRA and SIPC, unless otherwise directed by you and agreed to by us. Your directions to use another broker/dealer must be given to us in writing. When recommending LPL or TD Ameritrade, they may offer additional compliance and computer technology and research. LPL and/or TD Ameritrade also serve as the primary custodians for your assets. We do not act as custodian and will not have direct access to your funds and securities except to have advisory fees deducted from your account with your prior written authorization.

Your directions to use a broker/dealer other than LPL or TD Ameritrade must be given to us in writing. If you do so, you should understand that we may not be able to obtain the best prices and execution for account transactions. If you direct us to use a specific broker/dealer, you may receive less favorable prices than would otherwise be the case if you had not designated a particular broker/dealer or custodian. We may place directed trades after effecting non-directed trades for our other clients.

PPM accounts are charged a single "wrap fee" that covers advisory, execution, custodial and reporting services. For our PPM asset management services at the sole discretion of the Advisor, Clients may be offered the option of being billed on a percentage of assets under management or on a fixed fee basis. Asset under management fees are negotiated as a percentage of assets held in a client's managed accounts not to exceed an annualized rate of up to a maximum of 2% billed quarterly in advance and calculated as of the account value as of the beginning of each quarter. Fixed fee asset management services will be charged a fee not to exceed 2% of the asset under management calculated in advance and billed to the client account on a quarterly basis. The amount of asset management fees to be charged and the method of billing will be specified in the client agreement.

If accounts are created mid-quarter, fees are prorated and billed at the end of the initial period along with the first full quarter's advance billing. The prorated fee is based on the number of days services are provided during the quarter and begin on the day the account is initially funded.

The above fee schedule is negotiable at our discretion based on:

- The amount of assets under management
- The anticipated level of trading activity pursuant to the security types maintained in the account
- The complexity of the managed assets
- Whether or not we are granted discretionary authority on the account
- The number of accounts we are managing for you and your related persons
- Our history with or other relationships with you
- Potential future assets that may be invested with us

We require a minimum initial account value of \$1,000,000, although the minimum may be waived under certain circumstances (i.e., potential additional deposits, family relationships, referral sources, etc.).

PWM Program is available to clients with a minimum of \$5 Million in assets under management with our firm. PWM accounts are also charged a single “wrap fee” that covers advisory, execution, custodial and reporting services. For our PWM asset management services at the sole discretion of the Advisor, Clients may be offered the option of being billed on a percentage of assets under management or on a fixed fee basis.

Fees charged for our asset management services do not exceed 1% of the account value if the account meets our stated required minimum of \$1,000,000. If we accept an account that is less than \$1,000,000, the fees charged will range up to a maximum of 2% dependent upon factors such as the amount of assets to be managed, the anticipated level of trading, complexity, whether the account is discretionary or nondiscretionary, the number of accounts managed by related persons, and/or potential future assets that may be invested with us to make this calculation. For clients with multiple accounts, we do not aggregate accounts for purposes of fee billing. Asset Management fees are billed quarterly in advance and calculated as of the account value as of the beginning of each quarter. The amount of asset management fees to be charged and the method of billing will be specified in the client agreement.

The PWM annual fee are also negotiable based upon the following criteria:

- The complexity of the managed assets
- Our history with or other relationships with you
- Potential future assets that may be invested with us

The amount of asset management fees that will be charged to client accounts will be specified in the asset management agreement signed before any services are provided.

Unless agreed upon otherwise, you agree to have fees deducted from your account. You must provide the account custodian with written authorization to have the fees deducted from the account and paid directly to us. This authorization is usually given when the new account paperwork is prepared and signed. At least quarterly, you receive an account statement from your account custodian detailing transactions in your account, including advisory fees charged. You should review the account statements received from the account custodian and verify that appropriate advisory fees are being deducted.

For the purposes of calculating asset management fees, the “value of the account” means the sum of the long and short market value of all securities, mutual funds and, if applicable, money market funds, credit balances and cash balances in a related bank demand deposit account. In valuing the account, we use the closing prices or, if not available, bid prices of the last recorded transaction for listed securities,

options and over-the-counter NASDAQ securities. For mutual funds, we use the funds' most current net asset value, as computed by the fund company. In so doing, we utilize information provided by quotation services believed to be reliable. If any such prices are unavailable or believed to be unreliable, we determine prices in good faith so as to reflect our understanding of fair market value.

We do not bill on the value of the margin debit balance. If the account is maintained at a custodian other than margin debit balances may or may not reduce the account value.

To the extent mutual funds are selected to fill components of the overall investment strategy, the wrap-fee previously referenced does not include the customary fees and expenses associated with investing in mutual funds or other costs of establishing and maintaining an account with mutual funds including 12(b)-1 fees and expenses. In addition to the wrap-fee charged we charge, each mutual fund in which assets are invested incurs separate investment advisory fees and other expenses for which you bear a proportionate share. A description of these fees and expenses is available in each investment company security's prospectus.

The advisory fees charged by us are separate and distinct from these other fees and we do not receive or share in a portion of such fees. Our representatives do not receive a portion of the 12(b)-1 fees. Our representatives only recommend mutual funds to you if such mutual funds are suitable for you and appropriate for fulfilling your objectives.

Although we believe our fees are reasonable in relation to the services provided, you should be aware comparable services may be available from other sources. Fees for our services may be more or less than the cost of purchasing the same services separately through other investment advisors or through other programs offered by us.

We do not act as principal and do not buy from or sell securities we own to any client. We do not engage in agency cross transactions.

Either party may terminate our asset management services at any time by providing written notice to the other party. Termination is effective upon receipt of the notice. If notice is received within five business days of signing the client agreement, services are terminated without penalty and we promptly refund any fees you paid in advance. After the initial five business days, fees are prorated based on the number of days that services are provided prior to receipt of termination notice. We promptly refund any pre-paid, unearned fees to you.

## **Item 5 – Account Requirements and Types of Clients**

### **Minimum Investment Amounts Required**

For our PPM Program there is a minimum initial account value of \$1,000,000 required to establish an account, although this minimum may be waived under certain circumstances (i.e., potential additional deposits, family relationships, referral sources, etc.).

For our PWM Program we require a minimum of \$5 Million in assets under management with our firm.

## **Types of Accounts**

We provide investment advice to the following types of clients:

- Individuals (including high-net worth individuals)
- Pension and profit sharing plans
- Trusts, estates, or charitable organizations
- Corporations or business entities other than those listed above

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

We offer services through both wrap-fee programs and non-wrap fee programs. A wrap fee program is defined as any advisory program under which a specified fee or fees not based directly upon transactions in a client's account is charged for investment advisory services (which may include portfolio management or advice concerning the selection of other investment advisers) and the execution of client transactions. Whenever a fee is charged to you for advisory services (whether wrap fee or non-wrap fee advisory services), we receive all or a portion of the fee charged.

We and our managing member and representative Duane R. Bazis, Jr. act as the portfolio manager for the PPM and PWM Programs, which are wrap fee programs. Our asset management programs do not allow for the use of portfolio managers that are not associated with us. Therefore, conflicts of interest present in other wrap fee programs that make available both affiliated and unaffiliated portfolio managers are not present in the PPM Program. Because the PPM Program does not provide for a multitude of outside portfolio managers, we do not have procedures designed to select outside portfolio managers. Many of the disclosures required in the Item 6 Wrap Fee Program Brochure instructions do not apply to us. The disclosures that do apply are answered below.

## **Types of Advisory Services**

In addition to the wrap fee management services described above, we provide financial planning, and financial consulting and retirement plan services. Our financial planning and consulting services can be comprehensive and focus on your overall financial goals and objectives or can be modular and focus on your specific needs or areas of concern.

Please refer to our separate Disclosure Brochure for full details concerning our advisory services, fees, billing procedures and termination provisions.

## **Limits Advice to Certain Types of Investments**

We provide investment advice on the following types of investments:

- Exchange-listed securities
- Securities traded over-the-counter
- Foreign issues
- Warrants
- Corporate debt securities (other than commercial paper)



- Commercial paper
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Mutual fund shares
- United States government securities
- Option contracts on securities and commodities
- Futures contracts on tangibles and intangibles
- Interests in partnerships investing in real estate, oil and gas interests
- Alternative investments (including hedge funds, business development companies, private equity, leasing, exchange funds and structured products)

We reserve the right to offer advice on any investment product that may be suitable for each client's specific circumstances, needs, goals and objectives. You have the ability to place reasonable restrictions on the types of investments that may be purchased in your account.

### **Tailor Advisor Services to Individual Needs of Clients**

Our services are always provided based on your specific needs. You have the ability to impose restrictions on your accounts, including specific investment selections and sectors. However, we will not enter into an investment advisor relationship with a prospective client whose investment objectives may be considered incompatible with our investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines.

### **Performance-Based Fees**

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's account. We do not receive performance-based fees.

### **Methods of Analysis**

We use fundamental and charting analysis when considering investment strategies and recommendations for clients.

#### ***Fundamental***

Fundamental analysis is a method of evaluating a company or security by attempting to measure its intrinsic value. In other words, fundamental analysts try to determine its true value by looking at all aspects of the business, including both tangible factors (e.g., machinery, buildings, land, etc.) and intangible factors (e.g., patents, trademarks, "brand" names, etc.). Fundamental analysis also involves examining related economic factors (e.g., overall economy and industry conditions, etc.), financial factors (e.g., company debt, interest rates, management salaries and bonuses, etc.), qualitative factors (e.g., management expertise, industry cycles, labor relations, etc.), and quantitative factors (e.g., debt-to-equity and price-to-equity ratios).

The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security

(underpriced = buy, overpriced = sell or short). This method of security analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

### ***Charting***

Charting is a technical analysis that charts the patterns of stocks, bonds and commodities to help determine buy and sell recommendations for clients. It is a way of gathering and processing price and volume information in a security by applying mathematical equations and plotting the resulting data onto graphs in order to predict future price movements. A graphical historical record assists the analyst in spotting the effect of key events on a security's price, its performance over a period of time and whether it is trading near its high, near its low or in between. Chartists believe that recurring patterns of trading, commonly referred to as indicators, can help them forecast future price movements.

### ***Primary Method of Analysis or Strategy***

Our primary method of analysis or strategy is asset allocation--determining the percentages of stocks, bonds and cash relative to your risk profile, tax situation and investment horizon. Stocks are core long term equity holdings and weighted in close correlation to S&P sectors. Strategic equity positions are used to overweight or underweight S&P sectors relative to undervaluation or overvaluation estimates in sections based on fundamental research. Bond positions are laddered in maturity. Separate bond purchases are in A rated or better municipal, U.S. Government agencies and U.S. Treasury issues

### ***Investment Strategies***

The investment strategies we use when implementing investment advice include:

- Long term purchases (securities held at least a year.)
- Short term purchases (securities sold within a year.)
- Trading (securities sold within 30 days.)
- Short sales (Borrowing securities in anticipation of a price decline and returning an equal number of securities at some future time.)
- Margin transactions (Investor pays for part of the purchase and borrows the rest from a brokerage firm; e.g., investor buys \$5,000 worth of stock in a margin account by paying for \$2,500 and borrowing \$2,500 from a brokerage firm. Clients cannot borrow stock from Advisor.)
- Option writing (Including covered options, uncovered options or spreading strategies.) (Note: options are contracts giving the purchaser the right to buy or sell a security, such as stocks, at a fixed price within a specific period of time.)

We gather information from financial newspapers and magazines, inspection of corporate activities, research materials prepared by others, corporate ratings services, annual reports, prospectuses and filings with the Securities and Exchange Commission and company press releases.

### **Risk of Loss**

Investing in securities involves a risk of loss that you should be prepared to bear, including loss of your original principal. However, you should be aware that past performance of any security is not necessarily

indicative of future results. Therefore, you should not assume that future performance of any specific investment or investment strategy will be profitable. We do not provide any representation or guarantee that your goals will be achieved. Further, depending on the different types of investments, there may be varying degrees of risk:

- Market Risk. Either the market as a whole, or the value of an individual company, goes down, resulting in a decrease in the value of client investments. This is referred to as systemic risk.
- Equity (Stock) Market Risk. Common stocks are susceptible to fluctuations and to volatile increases/decreases in value as their issuers' confidence in or perceptions of the market change. Investors holding common stock (or common stock equivalents) of any issuer are generally exposed to greater risk than if they hold preferred stock or debt obligations of the issuer.
- Company Risk. There is always a certain level of company or industry specific risk when investing in stock positions. This is referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that a company may perform poorly or that its value may be reduced based on factors specific to it or its industry (e.g., employee strike, unfavorable media attention).
- Options Risk. Options on securities may be subject to greater fluctuations in value than investing in the underlying securities. Purchasing and writing put or call options are highly specialized activities and involve greater than ordinary investment risk. Puts and calls are the right to sell or buy a specified amount of an underlying asset at a set price within a set time.
- Fixed Income Risk. Investing in bonds involves the risk that the issuer will default on the bond and be unable to make payments. In addition, individuals depending on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- ETF and Mutual Fund Risk. ETF and mutual fund investments bear additional expenses based on a pro-rata share of operating expenses, including potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities held by the ETF or mutual fund. Clients also incur brokerage costs when purchasing ETFs.
- Management Risk. Your investments also vary with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our strategies do not produce the expected returns, the value of your investments will decrease.

When you purchase securities, you may pay for the securities in full or borrow part of the purchase price from your account custodian or clearing firm. If you borrow part of the purchase price then you are engaging in margin transactions and there is risk involved with this. The securities held in your margin account are collateral for the custodian or clearing firm that loaned you the money. If those securities decline in value, then the value of the collateral supporting your loan also declines. As a result, the brokerage firm is required to take action in order to maintain the necessary level of equity in your account. The brokerage firm may issue a margin call and/or sell other assets in your account.

It is important that you fully understand the risks involved in trading securities on margin, including:

- You can lose more funds than you deposit in your margin account
- The account custodian or clearing firm can force the sale of securities or other assets in your account
- The account custodian or clearing firm can sell your securities or other assets without contacting you
- You are not entitled to choose which securities or other assets in your margin account may be liquidated or sold to meet a margin call
- The account custodian or clearing firm may move securities held in your cash account to your margin account and pledge the transferred securities
- The account custodian or clearing firm can increase its “house” maintenance margin requirements at any time and are not required to provide you advance written notice
- You are not entitled to an extension of time on a margin call

### **Voting Client Securities**

We do not vote proxies on your behalf. You should read through the information provided in the proxy-voting documents and make a determination based on the information provided. If you request it, our representatives may provide limited clarifications of the issues presented based on their understanding of the issues presented in the materials. However, you have ultimate responsibility for making all proxy-voting decisions.

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

Because only our representatives serve as portfolio managers for the PPM Program, our representatives are responsible for gathering all information provided by you. They interview and work with you to gather all information needed relative to your investment objectives and needs in order to provide management services through the PPM Program. You are responsible for promptly contacting your representative to notify of us any changes to your financial situation that can impact or materially influence the way we manage your account.

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

Because only our representatives serve as portfolio managers for the PPM Program, there are no restrictions placed on your ability to contact and consult with us. It is our policy to provide open communications. You are encouraged to contact your representative whenever you have questions about management of your account.

### **Item 9 - Additional Information**

#### **Disciplinary Information**

We have no legal or disciplinary events that are material to your evaluation of our business or the integrity of our management. Therefore, this item is not applicable to our brochure.

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

We are not and do not have a related person that is:

- A broker/dealer, municipal securities dealer or government securities dealer or broker
- An investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund)
- Other investment advisor or financial planner
- A futures commission merchant, commodity pool operator or commodity trading advisor
- A banking or thrift institution
- Accountant or accounting firm
- A lawyer or law firm
- A pension consultant
- A real estate broker or dealer
- A sponsor or syndicator of limited partnerships

We are an independent registered investment registered advisor and only provide investment advisory services. We are not engaged in any other business activities and offer no other services except those described in our Disclosure Brochure. However, while we do not sell products or services other than investment advice, our representatives may sell other products or provide services outside of their role as investment advisor representatives with us.

## ***Insurance Sales***

Some of our representatives are also independently licensed to sell insurance products through various insurance companies. When acting in this capacity, they may receive fees or commissions for selling these products. You are under no obligation to direct insurance transactions to insurance companies with which our representatives may be licensed. Suitable insurance and investment products may be available from other companies.

## **Code of Ethics**

Federal and state rules and regulations require all investment advisers to establish, maintain and enforce a Code of Ethics. We have established a Code of Ethics that applies to all of our associated persons. An investment adviser is considered a fiduciary and, as a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of clients at all times. We have a fiduciary duty to all clients. This fiduciary duty is considered the core underlying principle for our Code of Ethics, which also covers our insider trading and personal securities transactions policies and procedures. Advisor requires all supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Once employed by or affiliated with us, and at least annually thereafter, all supervised persons sign an acknowledgement that they have read, understand and agree to comply with our Code of Ethics. We have the responsibility to make sure that the interests of all clients are placed ahead of our own investment interests. Full disclosure of all material facts and conflicts of interest is provided to you prior to any services being conducted. We and our supervised persons must conduct business in an honest, ethical and fair manner and avoid all circumstances that might negatively affect or appear to affect its duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of

Ethics. However, if you wish to review our Code of Ethics in its entirety, a copy is provided promptly upon request.

### **Participation in Client Transactions and Personal Trading**

Either we or our representatives or associated persons may buy or sell for our personal accounts investment products identical to those recommended to clients. This creates a conflict of interest. It is our express policy that all persons associated in any manner with us must place the interests of our clients ahead of their own when implementing personal investments. We will not buy or sell securities for our personal account(s) where our decision is derived, in whole or in part, by information obtained as a result of employment unless the information is also available to the investing public upon reasonable inquiry. In order to minimize this conflict of interest, securities recommended by us are widely held and publicly traded.

### **Account Reviews**

Each account is assigned a manager that is responsible for reviewing and monitoring the assets maintained in the account. Internal money managers use daily charting services and outside research to review the stock, bond and mutual fund positions to determine if any adjustments are needed to the model portfolios and to the separate portfolios.

### **Account Reports**

You receive statements from your account custodian at least quarterly.

### **Client Referrals**

We do not directly or indirectly compensate anyone for referring clients to us.

### **Other Compensation**

We do not receive any compensation for our advisory activities other than disclosed in this Disclosure Brochure.

### **Financial Information**

We do not require or solicit prepayment of more than \$1200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for our most recent fiscal year with this Brochure Appendix. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, we have not been the subject of a bankruptcy petition at any time.

## **Item 10 - Privacy Policy**

**Commitment to Your Private Information:** We have a long standing policy of protecting the confidentiality and security information we collect about our clients. We do not, and will not, share non-public personal information about you ("Information") with outside third parties without your consent,

except for the specific purposes described below. This notice is provided to describe the Information we may gather and the situations under which we may need to share it.

**Why We Collect and How We Use Information.** We limit the collection and use of Information within our firm to only those individuals associated or employed with us that must have Information to provide financial services to you. Such services include maintaining your accounts, processing transaction requests, providing financial planning, financial consultation and other services described in our Disclosure Brochure.

**How We Gather Information.** We get most Information directly from you when you provide us with information from any of the following sources:

- Applications or forms (for example: name, address, Social Security number, birth date, assets, income, financial history)
- Transactional activity in your account (for example: trading history and account balances)
- Information services and consumer reporting sources (for example: to verify your identity or to assess your credit history)
- Other sources with your consent (for example: your insurance professional, attorney, or accountant)

**How We Protect Information.** Our employees and affiliated persons are required to protect the confidentiality of Information and to comply with our stated policies. They may access Information only when there is an acceptable reason to do so, such as to service your account or provide you with financial services. Employees who violate our Privacy Policy are subject to disciplinary action up to and including termination from employment with us. We also maintain physical, electronic and procedural safeguards to protect information, which comply with applicable SEC, state and federal laws.

**Sharing Information with Other Companies Permitted Under Law.** We do not disclose Information obtained in the course of our practice except as required or permitted under law. Permitted disclosures include, for instance, providing information to unrelated third parties who need to know such Information in order to assist us with the providing services to you. Unrelated third parties may include broker/dealers, mutual fund companies, insurance companies and the custodian with which your assets are held. In such situations, we stress the confidential nature of information being shared.

**Former Customers.** Even if we cease to provide you with financial products or services, our Privacy Policy continues to apply to you and we continue to treat your non-public information with strict confidentiality.