

CONVERGENT FINANCIAL STRATEGIES LLC

a Registered Investment Adviser

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This brochure provides information about the qualifications and business practices of Convergent Financial Strategies LLC (hereinafter “CFS” 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

The material changes in this brochure from the last annual updating amendment of Convergent Financial Strategies LLC on March 01, 2021 are described below. Material changes relate to Convergent Financial Strategies LLC's policies, practices or conflicts of interests.

- CFS has transitioned to registration with the United States Securities and Exchange Commission from its prior registration at the state level.

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Item 4. Advisory Business

Convergent Financial Strategies (CFS) is a fee-only wealth management firm located in Plymouth Meeting, Pennsylvania. The Firm's clients are high net worth individuals, families, trusts, pension plans and corporations. CFS employs the philosophy that each client's financial planning, tax and investment needs are unique and delivers advice that is tailored to their specific circumstances, goals and objectives. The Firm is guided by fiduciary standards, and as such, seeks to put the interest of clients first.

CFS has been registered as an investment advisor since 2011 and is principally owned by Alan M. Schapire and Carl S. Nadwodny, each holding a 50% stake. As of December 31, 2020, the Firm managed assets in the amount of \$136,046,742 on a non-discretionary basis.

CFS offers a variety of advisory services to its clients, including financial planning and investment management services. Prior to engaging with the Firm, each client is required to enter into one or more written agreements with CFS setting forth the relevant terms and conditions of the advisory relationship (the "Advisory Agreement").

CFS is a proponent of the virtues of education and communication. As an extension of those beliefs, the Firm may from time to time send periodicals, newsletters or other materials to clients as well as prospective clients that are intended to increase awareness and/or understanding of a financial planning topic. Recipients are provided the ability to opt-out of any future distributions.

While this brochure generally describes the business of CFS, 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 CFS' behalf and is subject to the Firm's supervision or control.

Financial Planning Services

CFS offers a broad range of financial planning services to prospective clients for a fixed fee, which may include any or all of the following:

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|-----------------------------|----------------------|
| • Business Planning | • Risk Management |
| • Cash Flow Forecasting | • Charitable Giving |
| • Trust and Estate Planning | • Insurance Planning |
| • Investment Consulting | • Tax Planning |
| • Retirement Planning | • Asset Allocation |

Some or all of these services will be rendered in conjunction with non-discretionary investment portfolio management as part of a comprehensive wealth management engagement (described in more detail below).

In performing these services, CFS 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. CFS may recommend clients engage the Firm for additional related services and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists if clients engage CFS or its affiliates to provide additional services for compensation. Clients retain absolute discretion over all decisions regarding implementation and are under no obligation to act upon any of the recommendations made by CFS. 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 CFS' recommendations and/or services.

Investment Management Services

CFS manages investment portfolios for clients on a non-discretionary basis. Through discussions with our clients, we come to understand our client's goals, time horizon, liquidity needs and risk tolerance. We then develop an Investment Policy Statement that describes an investment strategy designed to help our clients achieve the goals as outlined in their financial plans.

CFS makes recommendations based on an evaluation of our discussions with the clients. Different types of investments involve a variety of risk and return considerations, and CFS strives to explain the nature of the risk and return aspects as part of the rationale for each recommendation. These recommendations are provided to and approved by clients prior to their implementation.

CFS primarily allocates client assets among various mutual funds, exchange-traded funds ("ETFs"), individual debt and equity securities and options. While rare, CFS may also recommend that certain eligible clients invest in other types of securities, which may include debt, equity and/or interests in pooled investment vehicles (e.g., hedge funds).

CFS may also provide advice about certain investments that are not maintained at the Firm's primary custodian, such as variable life insurance and annuity contracts and assets held in employer-sponsored retirement plans. In these situations, CFS advises on the allocation of such assets after consideration of the client's overall investment allocation.

CFS tailors its advisory services to meet the needs of its clients and seeks to ensure that their portfolios are managed in a manner consistent with their financial plan. CFS consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity needs and other related factors relevant to the management of their portfolios. Clients are advised to promptly notify CFS if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios.

Item 5. Fees and Compensation

CFS offers services on a fixed fee basis which encompasses all services provided to a client. Generally the Firm will first prepare a financial plan in conjunction with ongoing advisory services. If a client has not been provided with a copy of the Brochure Documents at least forty-eight (48) hours prior to signing an agreement, the client has five (5) business days to cancel the agreement, without penalty.

CFS continues to charge some existing clients on an hourly fee basis, which hourly fee was negotiated in the clients' contract. Additionally, in select circumstances, CFS may, at its sole discretion, elect to provide a consultation to a new client on an hourly basis. Such hourly fee will be between \$400 - \$500, subject to negotiation and agreement with the client, and will be disclosed in the contract with the client. Hourly fees are collected in arrears and paid by check.

Wealth Management Advisory Fees

CFS charges a fixed fee for providing wealth management services to all clients. This fixed fee generally ranges from \$2,500 to \$25,000 per year. The services include financial planning, income tax planning and investment advisory and management services, and may also include income tax preparation services. CFS provides a written quote of the fixed fee. This fixed fee is based upon the scope and complexity of the services and the client's situation. The terms and conditions of the engagement are set forth in the Advisory Agreement. The Firm does not take receipt of \$500 or more in prepaid fees in excess of six months in advance of services rendered. Once agreed upon, the fee is fixed for a two-year period unless both parties agree to adjust it or either party terminates the engagement. At the conclusion of the two-year period, a new fixed fee proposal is presented to the client. The fee is charged quarterly, in advance. Upon termination, any unearned fee will be refunded on a prorated basis.

Fee Discretion

CFS may, in its sole discretion, negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship, account retention and pro bono activities.

Additional Fees and Expenses

In addition to the advisory fees paid to CFS, clients may also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively “Financial Institutions”). These additional charges may include securities brokerage commissions, transaction fees, custodial fees, fees attributable to alternative assets, reporting charges, 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 in Item 12, below.

Direct Fee Debit

Clients generally provide CFS with the authority to directly debit their accounts for payment of the wealth management 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 CFS. Alternatively, clients may elect to have CFS send a separate invoice for direct payment.

Account Additions and Withdrawals

Clients may make additions to and withdrawals from their account at any time, subject to CFS’ right to terminate an account. In the event the advisory agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding or unearned portion of the fee is charged or refunded to the client, as appropriate. 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 CFS, 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. CFS 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

CFS 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

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

Minimum Account Requirements

CFS imposes a minimum fee for new clients of \$2,500, which may be negotiated or reduced in such certain and circumstances as deemed appropriate in the discretion of CFS. CFS does not impose a minimum portfolio value for starting and maintaining an investment management relationship.

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

Methods of Analysis

CFS employs a strategic asset allocation approach along with a combination of fundamental and technical analyses in developing investment advice and/or managing client assets.

Strategic asset allocation involves setting target allocations for asset classes which may include equity, debt or real estate. CFS believes that properly allocating investments across capitalization size, style, geography and quality is essential from a risk/return standpoint.

Fundamental analysis involves an assessment of current market conditions and the relative valuations of asset classes and individual investments. CFS analyses the financial condition of mutual fund, exchange-traded fund, stock, bond and real estate investments. The analysis includes an evaluation of an investment's financial performance and risk factors. 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.

Technical analysis involves the examination of past market data rather than specific issuer information in determining the recommendations made to clients. Technical analysis may involve the use of mathematical based indicators and charts, such as moving averages and price correlations, to identify market patterns and trends which may be based on investor sentiment rather than the fundamentals of the company. A substantial risk in relying upon technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that CFS will be able to accurately predict such a reoccurrence.

Investment Strategies

CFS provides customized investment advisory solutions for clients. Portfolios are constructed based on the premise that each client is unique and requires an individualized financial strategy to achieve their goals. The Firm aligns its client's goals with a dedicated solution that emphasizes risk-adjusted returns and expense management. A customized portfolio is created based on factors such as time horizon, liquidity needs, risk and return objectives, taxes, and inflation among other considerations.

The investment process begins with the preparation of the Investment Policy Statement ("IPS"). The IPS reflects a strategic asset allocation based on a client's financial plan, and has a long-term time horizon.

Strategic asset allocation is a result of an analysis of expected returns in light of prevailing capital market and economic conditions. An extension of this analysis results in a risk-adjusted relative value view for each asset class, and identifies the amount of relative emphasis, or "tilt", placed on each component of the portfolio. Applying these relative value tilts are commonly known as tactical asset allocation.

CFS believes that a significant amount of variation in returns can be attributed to the asset allocation decision. Using a core-satellite approach, investment assets are allocated among various mutual funds and/or exchange-traded funds, in accordance with a client's IPS. CFS investment strategies are developed with a focus on liquidity, expenses and tax efficiency.

Risk of Loss

Market Risks

Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The profitability of a significant portion of CFS' 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 CFS 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 shareholders 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.

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.

Options

Options allow investors to buy or sell a security at a contracted "strike" price at or within a specific period of time. Clients may pay or collect a premium for buying or selling an option. Investors transact in options to either hedge (*i.e.*, limit) losses in an attempt to reduce risk or to speculate on the performance of the underlying securities. Options transactions contain a number of inherent risks, including the partial or total loss of principal in the event that the value of the underlying security or index does not increase/decrease to the level of the respective strike price. Holders of options contracts are also subject to default by the option writer which may be unwilling or unable to perform its contractual obligations.

Management through Similarly Managed “Model” Accounts

CFS manages certain accounts through the use of similarly managed “model” portfolios, whereby the Firm allocates all or a portion of its clients’ assets among various mutual funds and/or securities on a non-discretionary basis using one or more of its proprietary investment strategies. In managing assets through the use of models, the Firm remains in compliance with the safe harbor provisions of Rule 3a-4 of the Investment Company Act of 1940.

The strategy used to manage a model portfolio may involve an above average portfolio turnover that could negatively impact clients’ net after tax gains. Clients should contact the Firm if they experience a change in their financial situation or if they want to impose reasonable restrictions on the management of their accounts.

Item 9. Disciplinary Information

CFS has not been involved in any legal or disciplinary events that are material to a client’s evaluation of its advisory business or the integrity of its management.

Item 10. Other Financial Industry Activities and Affiliations

Certain Supervised Persons of CFS render tax preparation services to clients. In the event a client requires tax preparation services, the firm may recommend Mr. Schapire, a principal of CFS and a certified public accountant. These services are rendered in conjunction with the financial planning and wealth management services. Fees are incorporated into the wealth management advisory fees paid to CFS.

Item 11. Code of Ethics

CFS 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. CFS’ 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 and shares of exchange-traded funds ahead of clients in order to take advantage of pending orders.

The Code of Ethics also requires certain of CFS' 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 completed as part of a batch trade with clients; 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; (ii) 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; (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds, and (v) shares of exchange-traded funds.

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

Item 12. Brokerage Practices

Recommendation of Broker/Dealers for Client Transactions

CFS generally recommends that clients utilize the custody, brokerage and clearing services of TD Ameritrade Institutional ("TD Ameritrade") for investment management accounts. CFS participates in the institutional customer program offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA, an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisers services which include custody of securities, trade execution, clearance and settlement of transactions. CFS receives some benefits from TD Ameritrade through its participation in the program.

Factors which CFS considers in recommending TD Ameritrade or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. TD Ameritrade may enable the Firm to obtain many mutual funds and exchange traded funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by TD Ameritrade may be higher or lower than those charged by other Financial Institutions.

The commissions paid by CFS' clients to TD Ameritrade 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 CFS 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. CFS 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 CFS in its investment decision-making process. Such research generally will be used to service all of the Firm's clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because CFS does not have to produce or pay for the products or services.

CFS periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to obtain best execution.

Software and Support Provided by Financial Institutions

CFS may receive without cost from TD Ameritrade computer software and related systems support, which allow CFS to better monitor client accounts maintained at TD Ameritrade. CFS may receive the software and related support without cost because the Firm renders investment management services to clients that maintain assets at TD Ameritrade. The software and support is not provided in connection with securities transactions of clients (i.e., not "soft dollars"). The software and related systems support may benefit CFS, but not its clients directly. In fulfilling its duties to its clients, CFS endeavors at all times to put the interests of its clients first. Clients should be aware, however, that CFS' receipt of economic benefits from a broker/dealer creates a conflict of interest since these benefits may influence the Firm's choice of broker/dealer over another that does not furnish similar software, systems support or services.

Specifically, CFS may receive the following benefits from TD Ameritrade:

- Receipt of duplicate client confirmations and bundled duplicate statements;
- Access to a trading desk that exclusively services its institutional traders;
- Access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and
- Access to an electronic communication network for client order entry and account information.

There is no direct link between CFS' participation in TD Ameritrade's institutional customer program and the investment advice it gives to its clients, although CFS receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. Additionally, the Firm has the ability to deduct advisory fees directly from client accounts; access to mutual funds and exchange-traded funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to the Firm by third party vendors. TD Ameritrade may fund business consulting and professional services received by CFS' related persons.

Some of the products and services made available by TD Ameritrade through the program may benefit CFS but not its client. These products or services may assist CFS in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help CFS manage and further develop its business enterprise. The benefits received by CFS' participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade.

Brokerage for Client Referrals

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

Directed Brokerage

The client may direct CFS in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution and the Firm will not seek better execution services or prices from other Financial Institutions or be able to “batch” client transactions for execution through other Financial Institutions with orders for other accounts managed by CFS (as described above). As a result, the client may pay higher commissions or other transaction costs, greater spreads or may receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, CFS may decline a client’s request to direct brokerage if, in the Firm’s sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Trade Aggregation

Transactions for each client generally will be effected independently, unless CFS decides to purchase or sell the same securities for several clients at approximately the same time. CFS may (but is not obligated to) combine or “batch” such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Firm’s clients differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among CFS’ clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that the Firm determines to aggregate client orders for the purchase or sale of securities, including securities in which CFS’ Supervised Persons may invest, the Firm generally does so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. CFS does not receive any additional compensation or remuneration as a result of the aggregation.

In the event that the Firm determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account’s assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, the Firm may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

Item 13. Review of Accounts

Account Reviews

CFS 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 Principals and/or investment adviser representatives. All wealth management clients are encouraged to discuss their needs, goals and objectives with CFS and to keep the Firm informed of any changes thereto. The Firm contacts ongoing wealth management clients at least annually to review its previous services and/or recommendations and 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 may also receive written or electronic reports from CFS 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 CFS 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.

Item 15. Custody

The Advisory Agreement and/or the separate agreement with any Financial Institution generally authorizes CFS 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 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 CFS.

In addition, as discussed in Item 13, CFS may also send periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the Financial Institutions and compare them to those received from CFS.

When it deducts fees directly from client accounts at a selected custodian, CFS will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Prior to deducting client fees via the Financial Institution that acts as the qualified custodian, CFS will:

- Obtain written authorization from the client to deduct advisory fees from an account held by a qualified custodian;
- Send the qualified custodian written notice of the amount of the fee to be deducted from the client's account; and
- Send the client an itemized invoice including any formulae used to calculate the fee, the time period covered by the fee, and the amount of assets under management on which the fee was based.

Item 16. Investment Discretion

CFS does not exercise investment discretion over client accounts. CFS 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.

Item 17. Voting Client Securities

Declination of Proxy Voting Authority

CFS 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 custodied 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

CFS is not required to disclose any financial information due to the following:

- The Firm does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of services rendered;
- The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.