

Firm Brochure

(Part 2A of Form ADV)

PATHFINDER WEALTH ADVISORS LLC

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This brochure provides information about the qualifications and business practices of PATHFINDER WEALTH ADVISORS LLC. If you have any questions about the contents of this brochure, please contact us at 216-533-0463. You may also contact us by email at josephine@pathfinderwealthadvisors.com. 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. *The firm refers to itself as a “registered investment adviser,” You should be aware that registration does not imply a certain level of skill or training.* Additional information about PATHFINDER WEALTH ADVISORS LLC is available on the SEC’s website at www.adviserinfo.sec.gov

December 13, 2021

Item 2: Material Changes

Interim Update

The Material Changes section of this form will be updated annually or when material changes occur since the previous release of this form or the Firm Brochure.

- This Document is an interim update..

This brochure replaces the previous published brochure dated June 1, 2021.

Material Changes since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization. Listed below are material changes since the last annual update dated March 16, 2021:

- It is with great sadness that we inform you that our Founder, Mark McCandless passed away on May 2, 2021. Due to Mark’s passing the firm ownership he held has passed to his trust at this time.
- The firm will continue it’s mission under the leadership of Josephine LaSpina Trotta who has worked closely with Mr. McCandless since 2015.
- In December 2021 we have moved. Our new address and new mailing address is listed on the front cover of this brochure.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 216-533-0463 or by email at josephine@pathfinderwealthadvisors.com.

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Item 4: Advisory Business

Firm Description

PATHFINDER WEALTH ADVISORS LLC was founded in 2014.

PATHFINDER WEALTH ADVISORS LLC provides personalized confidential investment management and financial planning primarily to individuals, trusts and to closely held businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, succession planning and estate planning. In addition the firm offers individual and trust income tax preparation to clients who have contracted for financial planning and/or investment management.

PATHFINDER WEALTH ADVISORS LLC is strictly a fee-only financial planning and investment management firm. The firm does not receive commissions for purchasing or selling annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted.

An evaluation of each client's initial situation is provided to the client. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

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

Principal Owners

Mark J. McCandless Restatement of Trust Dated July 21, 2011 (80%) and Josephine LaSpina Trotta (20%) are the owners of the firm.

Types of Advisory Services

PATHFINDER WEALTH ADVISORS LLC provides discretionary and non-discretionary investment advisory services, also known as asset management services. On more than an occasional basis, PATHFINDER WEALTH ADVISORS LLC furnishes advice to clients on matters not involving

securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

Tailored Relationships

The goals and objectives for each client will be documented. Investment policy statements are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Client Assets

Pathfinder Wealth Advisors, LLC has \$97,595,328 (Discretionary) and \$41,086,311 (Non-Discretionary) Assets Under Management totaling \$138,681,639 as of December 31, 2020.

Types of Agreements

The following agreements define the typical client relationships.

Advisory Contract (AC)

Most clients choose to have PATHFINDER WEALTH ADVISORS LLC manage their assets in order to obtain ongoing in-depth advice and life planning. Most aspects of the client's financial affairs are reviewed. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Contract is provided to the client in writing prior to the start of the relationship. An Advisory Contract may include: cash flow management; insurance review; portfolio management (including performance reporting); education planning; philanthropic planning; review of employee benefits, retirement planning; estate and succession planning; and tax planning and preparation, as well as review of the implementation of recommendations within each area.

The annual Advisory Contract fee is based upon whether the client service is only portfolio management or if other services beyond portfolio management are included. If portfolio management is included, the fee is based on a percentage of the investable assets according to the following schedule:

- 1.00% on the first \$1,000,000;
- 0.80% on the next \$1,000,000; and
- Negotiable on the assets above \$2,000,000.

If services requested are significantly beyond portfolio management, the fee

for the services beyond portfolio management will be a flat fee based upon the complexity and type of services rendered as well as consideration of the portfolio management with reference to the above schedule. See **Other Fees** below.

The client or PATHFINDER WEALTH ADVISORS LLC may terminate an AC by written notice to the other party. At termination, fees billed for the quarter and paid in advance of termination will be refunded based upon a proration of the fee from the beginning of the quarter until termination.

Tax preparation work may be performed as an integral part of the Advisory Contract. Eligible federal and applicable state returns are generally filed electronically without an additional fee to the client.

Hourly Planning Engagements

PATHFINDER WEALTH ADVISORS LLC provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$300.00 per hour.

Asset Management

Assets are invested primarily in no-load mutual funds and exchange-traded funds, usually through discount brokers. The brokerage dealer custodian may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm may charge a transaction fee for stock and bond trades. PATHFINDER WEALTH ADVISORS LLC does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Termination of Agreement

The client or PATHFINDER WEALTH ADVISORS LLC may terminate an AC by written notice to the other party. At termination, fees billed for the quarter and paid in advance of termination will be refunded based upon a proration of the fee from the beginning of the quarter until termination.

Item 5: Fees and Compensation

Fee Billing

Pathfinder bills in advance for the quarterly fee, meaning that we invoice at the beginning of the three-month billing period. In the fee calculation both contributions and distributions from the prior quarter shall be shown as adjustments on the quarterly invoice. We believe this is equitable in that we reflect fees associated with both contributions and distributions during the previous quarter into the quarterly fee that is billed in advance. For example, Clients that make additional contributions will see an adjustment to reflect the period the assets were added to the account during the previous quarter. Clients that have a distribution will see a credit to be applied to the current quarterly invoice.

For example, if an account has a balance of \$1,000,000 at the end of a quarter, the next quarterly fee billed in advance would be \$2,500 ($\$1,000,000 \times .0025$). If a \$250,000 contribution was made on the tenth day of the previous quarter, the fee would be pro-rated for the additional 80 days. Therefore, the invoice for the current quarter would reflect an additional 80 days for a total of \$555.56 ($(\$250,000 \times .0025) \times 80/90 \text{ days} = \555.56). If there was a distribution of \$25,000 on the 15th day of the previous quarter, the invoice for the current quarter would reflect a credit against the current quarterly fee of \$52.08. ($(\$25,000 \times .0025) \times 75/90 \text{ days} = \52.08).

Payment in full is expected upon invoice presentation. Fees may be deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account. The client will receive a memo billing indicating their fee will be deducted from their account.

Clients have the option of paying investment advisor fees by check upon receipt of the invoice.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

PATHFINDER WEALTH ADVISORS LLC, in its sole discretion, may waive its minimum fee and/or charge a lesser fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.25 means that the mutual fund company charges 0.25% for their services. These fees are in addition to the fees paid by you to PATHFINDER WEALTH ADVISORS LLC.

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

Past Due Accounts and Termination of Agreement

PATHFINDER WEALTH ADVISORS LLC reserves the right to stop work on any account that is more than 60 days overdue. In addition, PATHFINDER WEALTH ADVISORS LLC reserves the right to terminate any engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations that, in PATHFINDER WEALTH ADVISORS LLC's judgment, is necessary and appropriate to providing proper financial advice.

Item 6: Performance-Based Fees

Sharing of Capital Gains

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

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

Item 7: Types of Clients

Description

PATHFINDER WEALTH ADVISORS LLC generally provides personalized confidential financial planning and investment management primarily to individuals, trusts, and to closely held businesses.

Client relationships vary in scope and length of service.

Account Minimums

PATHFINDER WEALTH ADVISORS LLC does not maintain an account minimum but reviews the overall client relationship in the decision process of whether to accept a new account opening for a client.

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

Methods of Analysis

The main source of information that PATHFINDER WEALTH ADVISORS LLC may use include Morningstar Office research data base information, research prepared by Dimensional Fund Advisors and data obtained from Fidelity Institutional Wealth Services.

Other sources of information may include financial, business and “think tank” websites (i.e. Brookings Institution, Foreign Policy Research Institute) financial and business newspapers and magazines, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation. We believe that the asset allocation decision is the dominant factor in portfolio returns. We also believe that low expense ratio mutual funds and exchange traded funds combined with low turnover are foundational elements to successful portfolio management. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy.

Risk of Loss

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

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security’s particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Item 9: Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary actions by any regulatory authority related to past or present investment clients.

Item 10: Other Financial Industry Activities and Affiliations

Affiliations

PATHFINDER WEALTH ADVISORS LLC has no arrangements that are material to its advisory business or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm,

insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

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

Code of Ethics

The employees of PATHFINDER WEALTH ADVISORS LLC have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The Code of Ethics are available from the firm by request.

Participation or Interest in Client Transactions

PATHFINDER WEALTH ADVISORS LLC and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the PATHFINDER WEALTH ADVISORS LLC *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of PATHFINDER WEALTH ADVISORS LLC is Josephine LaSpina Trotta. She reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Item 12: Brokerage Practices

Selecting Brokerage Firms

The firm does not hold custody of client assets and therefore requires that a custodian hold the assets and execute client transactions. We require that our clients use Fidelity Institutional Wealth Services as their custodian. PATHFINDER WEALTH ADVISORS LLC selected Fidelity Institutional

Wealth Services as custodian based on their proven integrity and financial responsibility and the best execution of orders at reasonable commission rates. It is possible that a client may pay more in commission costs in some circumstances by using Fidelity Institutional Wealth Services. PATHFINDER WEALTH ADVISORS has no affiliation with Fidelity Institutional Wealth Services.

The client must agree to the custodian selected and the commission rates paid to the custodian. PATHFINDER WEALTH ADVISORS LLC does not receive any portion of the transaction fees or commissions paid by the client to the custodian on trades. Note that not all advisors require their clients to use a specific custodian or broker/dealer. The requirement to use a specific custodian and broker/dealer is strictly a policy of PATHFINDER WEALTH ADVISORS LLC.

Best Execution

PATHFINDER WEALTH ADVISORS LLC reviews the execution of trades at each custodian each quarter. Trading fees charged by the custodians are also reviewed on a quarterly basis. PATHFINDER WEALTH ADVISORS LLC does not receive any portion of the trading fees.

Soft Dollars

PATHFINDER WEALTH ADVISORS LLC does not receive any soft dollar credit from Fidelity. Some benefits such as potential availability to research and technical information are not tied to any commission arrangement.

Order Aggregation and Trade Errors

The firm may aggregate the purchase or sale of a security across various client accounts. This procedure does not decrease the settlement charge, if any, incurred by the client on the transaction. In the event of an error on the execution of a trade caused by PATHFINDER WEALTH ADVISORS LLC, we will reimburse the client for costs incurred due to our error.

Item 13: Review of Accounts

Periodic Reviews

Account reviews are performed quarterly by Josephine Trotta, Chief Investment Officer. Account reviews are performed more frequently in preparation for client meetings or when market conditions dictate.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Regular Reports

Clients receive periodic communications during the course of the calendar year. *Advisory Contract* clients receive written quarterly portfolio performance updates. Updates may include a portfolio statement, tax return (if the client requests tax preparation services), and a summary of objectives and progress towards meeting those objectives.

Item 14: Client Referrals and Other Compensation

Incoming Referrals

The firm does not compensate referring parties for these referrals except in the case where a paid solicitor has been engaged by the firm. No paid solicitor is currently engaged by the firm.

Referrals Out

PATHFINDER WEALTH ADVISORS LLC does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Other Compensation

The firm does not receive any form of compensation other than fees.

Item 15: Custody

Account Statements

The majority of assets are held at Fidelity which means Fidelity will provide account statements directly to clients at their address of record or electronically at least monthly. Pathfinder advises on some client assets held in workplace accounts. The trustee or administrator of the employer plan is responsible for transmittal of statements to clients. PATHFINDER WEALTH ADVISORS LLC does not maintain custody of client assets. Fees may be deducted from a designated client account to facilitate billing. Clients are urged to compare the account statements received directly from Fidelity to the statements provided by PATHFINDER WEALTH ADVISORS LLC.

In February 2017, the SEC issued a no-action letter clarifying that standing authority (also known as a standing letter of authorization or “SLOA”) to move money from a client’s account to a third party account is “custody” within the meaning of Investment Advisers Act Rule 206(4)-4 (the “Custody Rule”). The SEC also stated that any accounts that meet the following seven conditions (the SEC refers to them as “representations”) will not be subject to the “independent verification” requirement under Rule 206(4)-2(a)(4), also known as the annual surprise accountant’s examination. As such, our firm has adopted the following seven safeguards in conjunction with our custodian:

1. The client provides an instruction to the qualified custodian, in writing, that includes the client’s signature, the third party’s name, and either the third party’s address or the third party’s account number at a custodian to which the transfer should be directed.
2. The client authorizes the investment adviser, in writing, either on the qualified custodian’s form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The client’s qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client’s authorization, and provides a transfer of funds notice to the client promptly after each transfer.
4. The client has the ability to terminate or change the instruction to the client’s qualified custodian.
5. The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client’s instruction.
6. The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
7. The client’s qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

The client must agree to the custodian selected and the commission rates paid to the custodian. PATHFINDER WEALTH ADVISORS LLC does not receive any portion of the transaction fees or commissions paid by the client to the custodian on trades. Note that not all advisors require their clients to use a specific custodian or broker/dealer. The requirement to use a specific custodian and broker/dealer is strictly a policy of PATHFINDER WEALTH ADVISORS LLC.

Performance Reports

Clients are urged to compare the account statements received directly from Fidelity to the performance report statements provided by PATHFINDER WEALTH ADVISORS LLC.

Net Worth Statements

Clients are occasionally provided net worth statements and net worth graphs that are generated from our software. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. The net worth statements are

used for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

Item 16: Investment Discretion

Discretionary Authority for Trading

PATHFINDER WEALTH ADVISORS LLC accepts discretionary authority to manage securities accounts on behalf of clients.

PATHFINDER WEALTH ADVISORS LLC has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, PATHFINDER WEALTH ADVISORS LLC consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose.

You sign a limited power of attorney so that we may execute the trades that you have approved.

Item 17: Voting Client Securities

Proxy Votes

PATHFINDER WEALTH ADVISORS LLC will not vote proxies on securities. Clients are expected to vote their own proxies. We will assist clients in matters dealing with response to tender offers, administration of class action notifications and related shareholder matters.

Item 18: Financial Information

Financial Condition

PATHFINDER WEALTH ADVISORS LLC does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients or other outside parties.

Item 19: Requirements for State Registered Advisors

Identify Principal Executive Officers and Management

Josephine LaSpina Trotta, President, Chief Compliance Officer and Chief Investment Officer

Ms. Trotta was born in 1961. She graduated from Cleveland State University in 1986 with a Bachelor of Science in Business Administration. She received her Master of Business Administration (MBA) from John Carroll University in 1991. She completed National Graduate Trust School I (1994) and II (1998) at Northwestern University.

Josephine is a seasoned professional experienced in the financial services industry since 1985. She has worked with clients in investment management, financial planning, trust financial services, and private banking. Her career in banking includes private banking, lending, and trust services at Key Bank and US Bank. She was promoted numerous times at Key Bank and became the Vice President and Manager of Private Banking & Investing. She then turned to investment advisory services as a Financial Advisor at Merrill Lynch, UBS, and Stratos Wealth Partners. Prior to Pathfinder Wealth Advisors, she worked at TIAA-CREF where she opened the Wealth Management Office in Cleveland. Ms. Trotta has been serving the investment needs of clients at Pathfinder since 2015.

Describe Business Other Than Investment Advice

Josephine LaSpina Trotta and the firm are not actively engaged in any other business.

Describe How Supervised Persons are compensated with performance based fees

The Firm or any of its supervised personnel are not compensated with performance based fees.

Describe if a Management Person has been subject to a Disciplinary Event

The Management Persons of the firm have not been involved in any arbitration claim of any amount or any legal or disciplinary actions by any domestic, foreign or military court of competent jurisdiction, any domestic or foreign regulatory authority including the SEC and The State of Ohio, or any Self-Regulatory Organization (SRO) related to past or present investment clients or matters.

Describe any Relationship with an Issuer of Securities

The firm and its owners have no relationship with any issuer of securities.

Business Continuity Plan

General

PATHFINDER WEALTH ADVISORS LLC has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up in cloud based storage.

Alternate Offices

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

Information Security Program

Information Security

PATHFINDER WEALTH ADVISORS LLC maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

PATHFINDER WEALTH ADVISORS LLC is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

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

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

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ cloud based software solutions and authentication procedures in our computer environment.

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

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

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.