



**V&V Management Group Corporation
DBA Four Corners Financial**

Form ADV Part 2A – Disclosure Brochure

Effective: February 1, 2021

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of V&V Management Group Corporation DBA Four Corners Financial (“Four Corners Financial” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact the Advisor at (631) 271-1170.

Four Corners Financial is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Four Corners Financial to assist you in determining whether to retain the Advisor.

Additional information about Four Corners Financial and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm name or CRD# 287468.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Four Corners Financial. For convenience, the Advisor has combined these documents into a single disclosure document.

Four Corners Financial believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Four Corners Financial encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients:

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 287468. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (631) 271-1170.

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Item 4 – Advisory Services

A. Firm Information

V&V Management Group Corporation DBA Four Corners Financial (“Four Corners Financial” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). Four Corners Financial is organized as a Corporation under the laws of the State of New York. Four Corners Financial was founded in September 2016 and is owned and operated by Steven T. Varvaro, CFP® (Principal and Financial Advisor) and Thomas C. Varvaro, CPA (Principal and Financial Advisor), (herein the “Principal Owners”). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Four Corners Financial.

B. Advisory Services Offered

Four Corners Financial offers investment advisory services to individuals, high net worth individuals, trusts, estates and retirement plans (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Four Corners Financial’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Wealth Management Services

Four Corners Financial provides Clients with wealth management services, which generally includes a broad range of comprehensive financial planning and consulting services in connection with discretionary management of investment portfolios. These services are described below.

Investment Management Services - Four Corners Financial provides customized investment advisory solutions for its Clients, through their primary portfolios. Each of these portfolios uses the same securities with variations of percentages based on the Client’s risk tolerance. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. Four Corners Financial works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation. Four Corners Financial models consist of diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, corporate debt securities or bonds to meet the needs of its Clients. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Four Corners Financial’s investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Four Corners Financial will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Four Corners Financial evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Four Corners Financial may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Four Corners Financial may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Four Corners Financial may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will Four Corners Financial accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within their designated

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account[s] at the Custodian, pursuant to the terms of the advisory agreement. For additional information, please see Item 12 – Brokerage Practices.

Financial Planning Services - Four Corners Financial will typically provide a variety of financial planning services to Clients, either as a component of its wealth management services or pursuant to a written financial planning agreement. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings and other areas of a Client's financial situation.

A financial plan developed for the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

Four Corners Financial may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. Plans are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning poses a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

Retirement Plan Advisory Services

Four Corners Financial provides retirement plan advisory services on behalf of the retirement plans (each a "Plan") and the company (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Plan Participant Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Design and Monitoring
- Investment Management Services (ERISA 3(38))
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance

These services are provided by Four Corners Financial serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of Four Corners Financial's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

C. Client Account Management

Prior to engaging Four Corners Financial to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client.

These services may include:

- Establishing Investment Strategies – Four Corners Financial, in connection with the Client, will develop a strategy that seeks to achieve the Client's investment goals and objectives.
- Asset Allocation – Four Corners Financial will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Four Corners Financial will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Four Corners Financial will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

Four Corners Financial does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Four Corners Financial.

E. Assets Under Management

As of December 31, 2020, Four Corners manages \$51,187,545 in Client assets, \$49,874,574 of which are managed on a discretionary basis and \$1,312,971 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

A. Fees for Advisory Services

Wealth Management Services

Wealth management fees are paid quarterly, at the end of each calendar quarter, pursuant to the terms of the wealth management agreement. Wealth management fees are based on the market value of assets under management at the end of each calendar quarter. Wealth management fees are based on the following schedule:

Assets Under Management	Annual Rate
Up to \$1,000,000	1.00%
\$1,000,001 - \$2,000,000	0.80%
\$2,000,001 - \$3,000,000	0.60%
\$3,000,001 - \$10,000,000	0.40%
\$10,000,001 and Over	0.20%

The wealth management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Four Corners Financial will be independently valued by the Custodian. Four Corners Financial will not have the authority or responsibility to value portfolio securities.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Financial Planning Services

Although, the Advisor typically includes financial planning as part of its overall wealth management engagement. In certain instances, the Client may engage the Advisor for planning separately.

Four Corners Financial offers one-time financial planning services either on an hourly basis or for a fixed fee. Financial planning fees are charged hourly up to \$300 per hour or as a fixed fee engagement. Fixed fees are based on the expected number of hours to complete the engagement at the negotiated hourly rate. Four Corners Financial also offers ongoing financial planning services for an annual fee ranging from \$2,500 to \$10,000. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total hours and total costs will be provided to the Client prior to engaging for these services.

Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 0.60%. Retirement plan advisory fees are based on the market value of assets under management at the end of each calendar quarter and are generally based on the following schedule:

Assets Under Management	Annual Rate
Up to \$1,000,000	0.60%
\$1,000,001 - \$5,000,000	0.50%
\$5,000,001 - \$10,000,000	0.40%
\$10,000,001 and Over	0.30%

Fees may be negotiable depending on the size and complexity of the Plan. Certain existing Clients may have fee schedules that differ from the schedule above.

B. Fee Billing

Wealth Management Services

Wealth management fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective quarter end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Four Corners Financial at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the wealth management fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by Four Corners Financial to be paid directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

Financial Planning Services

One-time financial planning fees are invoiced by the Advisor upon completion of the agreed upon deliverable[s], and due upon receipt. Ongoing financial planning fees are invoiced at the end of each quarter and due upon receipt.

Retirement Plan Advisory Services

Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Four Corners Financial, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all securities execution and custody fees charged by the Custodian, if applicable. The investment advisory fee charged by Four Corners Financial is separate and distinct from these custody and execution fees.

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In addition, all fees paid to Four Corners Financial for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Four Corners Financial, but would not receive the services provided by Four Corners Financial which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Four Corners Financial to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Wealth Management Services

Four Corners Financial is compensated for its wealth management services at the end of the quarter after services are rendered. Either party may terminate the wealth management agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the wealth management agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's wealth management agreement with the Advisor is non-transferable without the Client's prior consent.

Financial Planning Services

Four Corners Financial is compensated for financial planning services upon completion of the engagement deliverable[s]. Ongoing financial planning fees are due at the end of each calendar quarter. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate or in the case of a fixed fee engagement, the percentage of the engagement scope completed by the Advisor. For ongoing financial planning services, the Client shall be responsible for fees up to and including the effective date of termination. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

Retirement Plan Advisory Services

Four Corners Financial is compensated for its retirement plan advisory services at the end of the quarter after services are rendered. Either party may request to terminate their services with Four Corners Financial, at any time, by providing advance written notice to the other party. The Client may also terminate the retirement advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client shall be responsible for retirement plan advisory fees up to and including the effective date of termination. The Client's retirement plan advisory agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

Four Corners Financial does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Item 6 – Performance-Based Fees and Side-By-Side Management

Four Corners Financial does not charge performance-based fees for its investment advisory services. The fees charged by Four Corners Financial are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

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Four Corners Financial does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

Four Corners Financial offers investment advisory services to individuals, high net worth individuals, and retirement plans. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Four Corners Financial generally does not impose a minimum relationship size.

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

A. Methods of Analysis

Four Corners Financial employs both a cyclical or Fama French analysis method in developing investment strategies for its Clients. Research and analysis from Four Corners Financial are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Cyclical analysis is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that Four Corners Financial is recommending. The risks with cyclical analysis are similar to those of technical analysis.

Fama-French Three-Factor Model ("FF3FM") is an asset-pricing model designed by Eugene Fama, Ph.D. and Kenneth French, Ph.D. to describe the returns of stocks. The FF3FM is based on extensive research performed by Fama and French (and others) which observed that smaller stocks (as measured by market capitalization) and value (or low relative price) stocks outperformed the broad market over long periods of time and with a high degree of persistence. This research led to the development of the FF3FM, which added a size factor and a price factor to the market factor contained in the Capital Asset Pricing Model ("CAPM"). Through extensive testing and analysis, the FF3FM has been shown to explain the vast majority (more than 90%) of the returns of a diversified portfolio providing further evidence that stock selection and market timing should not be a focus of the investment decision making process. As academics, financial economists, and industry practitioners continue to research the returns of stocks and other assets, additional factors such as momentum, profitability, and liquidity have been identified as contributing to returns. Four Corners Financial incorporates this research and the FF3FM into its portfolio construction process.

As noted above, Four Corners Financial generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Four Corners Financial will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Four Corners Financial may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Four Corners Financial will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic

indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. The following are some of the risks associated with the potential speculative components of the Advisor's investment approach:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving Four Corners Financial or any of its management persons. Four Corners Financial values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 287468.

Item 10 – Other Financial Industry Activities and Affiliations

Thomas C Varvaro CPA PC

The Advisor also offers tax preparation and accounting services to Clients through Thomas C Varvaro CPA PC ("Thomas C Varvaro CPA"), an affiliated entity under common control with the Advisor. Tax preparation and

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accounting services are separate and distinct from the advisory services offered to Clients and are based on the unique needs of each Client. The time devoted to tax preparation increases during tax season. Clients are not obligated to engage Thomas C Varvaro CPA for these services in order to have an advisory relationship with the Advisor.

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

A. Code of Ethics

Four Corners Financial has implemented a Code of Ethics (the “Code”) that defines the Advisor’s fiduciary commitment to each Client. This Code applies to all persons associated with Four Corners Financial (“Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor’s duties to the Client. Four Corners Financial and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Four Corners Financial’s Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (631) 271-1170.

B. Personal Trading with Material Interest

Four Corners Financial allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Four Corners Financial does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Four Corners Financial does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Four Corners Financial allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Four Corners Financial requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer (“CCO”) or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While Four Corners Financial allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no time will Four Corners Financial, or any Supervised Person of Four Corners Financial transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Four Corners Financial does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the “Custodian”) to safeguard Client assets and authorize Four Corners Financial to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Four Corners Financial does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Four Corners Financial does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by Four Corners Financial. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Four Corners Financial may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client and/or its reputation. Four Corners Financial will generally recommend that Clients engage with Shareholders Service Group, LLC ("SSG") and custody their account[s] at Pershing, LLC ("Pershing"), a FINRA-registered broker-dealer and member SIPC. Pershing will serve as the Client's "qualified custodian". Four Corners Financial maintains an institutional relationship with SSG, whereby the Advisor receives economic benefits from SSG. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Four Corners Financial does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from SSG. Please see Item 14 below.**

2. Brokerage Referrals - Four Corners Financial does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where Four Corners Financial will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Four Corners Financial will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Four Corners Financial will execute its transactions through Custodian as directed by the Client. Four Corners Financial may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by the Principal Owners of Four Corners Financial. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large

deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Four Corners Financial if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by Four Corners Financial

Four Corners Financial is a fee-based advisory firm, that is compensated solely by its Clients and not from any investment product. Four Corners Financial does not receive commissions or other compensation from product sponsors, broker-dealers or any unrelated third party. Four Corners Financial may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Four Corners Financial may receive non-compensated referrals of new Clients from various third-parties.

Participation in Institutional Advisor Platform

Four Corners Financial has established an institutional relationship with SSG, whereby accounts are custodied through Pershing, to assist the Advisor in managing Client account[s]. Access to the SSG's platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment advisory services to Clients that maintain assets at SSG. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from SSG creates a conflict of interest since these benefits may influence the Advisor's recommendation of SSG over one that does not furnish similar software, systems support, or services.

B. Client Referrals from Solicitors

Four Corners Financial does not engage paid solicitors for Client referrals.

Item 15 – Custody

Four Corners Financial does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct Four Corners Financial to utilize the Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by Four Corners Financial to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

Item 16 – Investment Discretion

Four Corners Financial generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales

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may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Four Corners Financial. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Four Corners Financial will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Four Corners Financial does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither Four Corners Financial, nor its Principal Officers have any adverse financial situations that would reasonably impair the ability of Four Corners Financial to meet all obligations to its Clients. Neither Four Corners Financial, nor its Principal Officers have been subject to a bankruptcy or financial compromise. Four Corners Financial is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.



Form ADV Part 2B – Brochure Supplement

for

Steven T. Varvaro, CFP®
Principal, Chief Compliance Officer and Financial Advisor

Effective: February 1, 2021

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Steven T. Varvaro, CFP® (CRD# 6297125) in addition to the information contained in the V&V Management Group Corporation DBA Four Corners Financial (“Four Corners Financial” or the “Advisor”, CRD# 287468) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Four Corners Financial Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (631) 271-1170.

Additional information about Mr. Varvaro is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6297125.

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Item 2 – Educational Background and Business Experience

Steven T. Varvaro, CFP® born in 1990, is dedicated to advising Clients of Four Corners Financial as its Principal Financial Advisor and Chief Compliance Officer. Mr. Varvaro earned a Bachelor of Science in Finance and in Economics from Hofstra University in 2012. Additional information regarding Mr. Varvaro's employment history is included below.

Employment History:

Principal, Financial Advisor, and Chief Compliance Officer V&V Management Group Corporation DBA Four Corners Financial	01/2017 to Present
Financial Advisor, Larry Heller & Associates	04/2016 to 05/2017
Analyst, JP Morgan Chase	07/2012 to 04/2016

About the CFP® Designation

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Varvaro. Mr. Varvaro has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Varvaro.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Varvaro.***

However, we do encourage you to independently view the background of Mr. Varvaro on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6297125.

Item 4 – Other Business Activities

Mr. Varvaro is dedicated to the investment advisory activities of Four Corners Financial's Clients. Mr. Varvaro does not have any other business activities.

Item 5 – Additional Compensation

Mr. Varvaro is dedicated to the investment advisory activities of Four Corners Financial's Clients. Mr. Varvaro does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Varvaro serves as a Principal, Financial Advisor and Chief Compliance Officer of Four Corners Financial. Mr. Varvaro can be reached at (631) 271-1170.

Four Corners Financial has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Four Corners Financial. Further, Four Corners Financial is subject to regulatory oversight by various agencies. These agencies require registration by Four Corners Financial and its Supervised Persons. As a registered entity, Four Corners Financial is subject to examinations by regulators, which may be announced or unannounced. Four Corners Financial is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



Form ADV Part 2B – Brochure Supplement

for

**Thomas C. Varvaro, CPA
Principal and Financial Advisor**

2801 Rosedown Point, Mt Pleasant, South Carolina 29466

Effective: February 1, 2021

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Thomas C. Varvaro, CPA (CRD# 4605930) in addition to the information contained in the V&V Management Group Corporation DBA Four Corners Financial ("Four Corners Financial" or the "Advisor", CRD# 287468) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Four Corners Financial Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (631) 271-1170.

Additional information about Mr. Varvaro is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4605930.

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Item 2 – Educational Background and Business Experience

Thomas C. Varvaro, CPA, born in 1955, is dedicated to advising Clients of Four Corners Financial as a Principal and Financial Advisor. Mr. Varvaro also earned a Bachelor of Science in Accounting from Long Island University in 1978. Mr. Varvaro has been a member of the New York State Society of CPAs and the American Institute of Certified Public Accountants since 1980. Additional information regarding Mr. Varvaro's employment history is included below.

Employment History:

Principal and Financial Advisor, V&V Management Group Corporation DBA Four Corners Financial	01/2017 to Present
President, Thomas C Varvaro CPA PC	01/1980 to Present

Certified Public Accountant ("CPA")

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Varvaro.. Mr. Varvaro has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Varvaro.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Varvaro.***

However, we do encourage you to independently view the background of Mr. Varvaro on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4605930.

Item 4 – Other Business Activities

Thomas C Varvaro CPA PC

Mr. Varvaro is the President of Thomas C Varvaro CPA PC ("Thomas C Varvaro CPA"). Mr. Varvaro offers tax preparation and accounting services to Clients through Thomas C Varvaro CPA, an affiliated entity under common control with the Advisor. Tax preparation and accounting services are separate and distinct from the advisory services offered to Clients and are based on the unique needs of each Client. The time devoted to tax preparation increases during tax season. Clients are not obligated to engage Thomas C Varvaro CPA for these services in order to have an advisory relationship with the Advisor.

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Item 5 – Additional Compensation

Mr. Varvaro has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Varvaro serves as a Principal and Financial Advisor of Four Corners Financial and is supervised by Steven T. Varvaro, the Chief Compliance Officer. Steven T. Varvaro can be reached at (631) 271-1170.

Four Corners Financial has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Four Corners Financial. Further, Four Corners Financial is subject to regulatory oversight by various agencies. These agencies require registration by Four Corners Financial and its Supervised Persons. As a registered entity, Four Corners Financial is subject to examinations by regulators, which may be announced or unannounced. Four Corners Financial is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective: February 1, 2021

Our Commitment to You

V&V Management Group Corporation DBA Four Corners Financial ("Four Corners Financial" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Four Corners Financial (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Four Corners Financial does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals
Tax Return	

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes Four Corners Financial does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Four Corners Financial or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
Information About Former Clients Four Corners Financial does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (631) 271-1170.