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**FORM ADV PART 2A
BROCHURE**

This brochure provides information about the qualifications and business practices of QP Consulting, LLC (hereinafter, "QP Consulting"). If you have any questions about the contents of this brochure, please contact us at (301) 326-1521. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about QP Consulting is available on the SEC's website at www.adviserinfo.sec.gov.

QP Consulting is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since our last annual updating amendment dated January 21, 2020, we have the following material change to report:

- We have updated the suite number associated with our principal address to Suite # 407.
- We have updated the list of broker-dealers that we maintain relationships with; please see the *Brokerage Practices* section for additional details.
- Additionally, we no longer offer Financial Planning services. All references to Financial Planning have been removed from our Brochure.
- Lastly, we removed the disclosure related solicitors. We do not receive any compensation from any third party in connection with providing investment advice to you nor do we compensate any individual or firm for client referrals.

If you have questions or would like a copy of our most recent brochure, you can request one free of charge at anytime by contacting us at (301) 326-1521 or 6930 Carroll Avenue, Suite 407, Takoma Park, MD 20912.

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Item 4 Advisory Business

Description of Services

We are a registered investment adviser primarily based in Takoma Park, Maryland. Since 2002, we have provided investment advisory services as a sole proprietorship; in 2014, we reorganized as a single member limited liability company under the laws of Maryland. Mark Ivcevic is the sole owner/managing member of the firm. Currently, we offer the following investment advisory services, which are personalized to each individual client:

- Pension Consulting Services
- Portfolio Management Services

The following paragraphs describe our services. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "we," "our," and "us" refer to QP Consulting, LLC (hereinafter "QP Consulting") and the words "you," "your," and "client" refer to you as either a client or prospective client of our firm.

Pension Consulting Services

We provide corporations with a broad range of services regarding retirement plans. We serve as either an ERISA 3(21) Investment Advisor or an ERISA 3(38) Investment Manager for our corporate retirement plan clients. If you choose to implement any of our recommendations you may do so entirely at your discretion unless you have engaged us as an ERISA 3(38) Investment Manager. In general, these services include any one or all of the following:

1. **Develop Retirement Plan Specifications** - In order for you to evaluate the various retirement plan providers uniformly, we assist in determining your specific needs.
2. **Comprehensive Marketplace Search** - We will search the marketplace and provide quotations from leading retirement plan vendors that are compatible with your needs.
3. **Recommendations** - We will make recommendations regarding vendor selection based upon study results and your goals and objectives.
4. **Plan Management** - We will act as an intermediary between you and the plan vendor to ensure that the relationship is maximized and your retirement plan is operating at its optimal level. Where we are assisting you in converting from one vendor to another, we will help manage the conversion to lessen the burden on your internal resources.
5. **Investment Policy Statement** - We assist you in the formation and/or continued maintenance of your investment policy statement to help ensure that the plan's investment selections are appropriate based on current market conditions. Additionally, we will evaluate the investment selection to optimize the offerings made to plan participants.
6. **Implementation** - When a vendor is selected by you as record keeper or administrator for your retirement plan's assets, we will assist you in the implementation process.
7. **Plan Review** - A plan review is a comprehensive exam of all major components of your retirement plan in order to identify strengths and weaknesses. The review can cover such areas as overall plan structure, costs, compliance, and investment perspectives.
8. **Ongoing Consulting** - We will also provide annual investment reviews, which compare the current investment options to those with the investment peer groups. Moreover, we will apply our proprietary analysis to our existing investment selections and provide recommendations as to whether the plan should add investments to, or remove investments from, the available selections.
9. **Communication & Education** - We will help you coordinate and deliver meaningful information regarding the retirement plan to its administrators and participants.
10. **Asset Allocation Modeling** - As part of our services, we will offer to provide asset allocation

models to the plan's participants if the record keeper has the capability to offer model portfolios.

Portfolio Management Services

We offer discretionary and non-discretionary portfolio management services. Our investment advice is tailored to meet your needs and investment objectives. If you retain our firm for portfolio management services, we will meet with you to determine your investment objectives, risk tolerance, and other relevant information at the beginning of our advisory relationship. We will use the information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice and/or to make investments on your behalf. As part of our portfolio management services, we may customize an investment portfolio for you in accordance with your risk tolerance and investing objectives. We may also invest your assets according to one or more model portfolios developed by our firm. Once we construct an investment portfolio for you, or select a model portfolio, we will monitor your portfolio's performance on an ongoing basis, and will rebalance the portfolio as required by changes in market conditions and in your financial circumstances.

If you participate in our discretionary portfolio management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow our firm to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the portfolio management agreement you sign with our firm, a power of attorney, or trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased for your account) by providing our firm with your restrictions and guidelines in writing. If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account.

Types of Investments

We primarily offer advice on mutual funds, exchange traded funds, collective investment trusts and regarding sub accounts of group annuities that are used in a pension plan.

Additionally, we may advise you on any type of investment that we deem appropriate based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

You may request that we refrain from investing in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

Assets Under Management

As of December 31, 2020, we manage \$28,966,500 in client assets on a discretionary basis and \$334,846,732 in client assets on a non-discretionary basis.

Item 5 Fees and Compensation

Pension Consulting Fees

We typically charge a fixed fee ranging from \$5,000 to \$150,000 depending on the size of the plan and the agreed upon services. In either case, the fees will be negotiated in advance and will be clearly set forth in the agreement for services. We reserve the right to bill hourly fees above and beyond this amount for services outside of the scope of the contract. Payment of the pension consulting fees is made to us by the custodian holding the client's funds and securities and/or the vendor administering the retirement plan. The client will also have the option of having us invoice the client directly if the fees are to be paid out of corporate assets versus plan assets. However, fee-payment arrangements may vary depending upon each custodian's and/or vendor's policies and procedures. In limited

circumstances, we will charge fees based on a percentage of plan assets. For record keepers and/or custodians who do not support a custom schedule, we will utilize an asset based compensation scale that corresponds closest to the appropriate tier.

You may terminate the agreement upon giving 60 days written notice of intent to terminate. We are entitled to payment of all fees incurred through the effective date of termination and these fees will be due and payable by you.

Portfolio Management Services

Our fee for portfolio management services is based on a percentage of your assets we manage and is set forth in the following fee schedule:

Assets Under Management	Annual Fee**
Accounts less than or equal to \$1,000,000	0.50%
\$1,000,001 to \$3,000,000	0.40%
\$3,000,001 but less than \$5,000,000	0.30%
\$5,000,001 to \$10,000,000	0.25%
\$10,000,001 and over	\$25,000 (fixed)

**We require a non-negotiable minimum annual fee of \$1,500 for portfolio management services. When a portfolio management services client retains our services because they are clients of an investment adviser representative who has moved to our firm, we will honor the pricing they have agreed to with their investment adviser representative regardless of whether or not it fits into our standard pricing model.

Our annual portfolio management fee is billed and payable quarterly in arrears based on the value of your account on the last day of the quarter.

If the portfolio management agreement is executed at any time other than the first day of a calendar quarter, our fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which you are a client. Our advisory fee is negotiable, depending on individual client circumstances.

At our discretion, we may combine the account values of family members living in the same household to determine the applicable advisory fee. For example, we may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts. Combining account values may increase the asset total, which may result in your paying a reduced advisory fee based on the available breakpoints in our fee schedule stated above.

We will send you an invoice for the payment of our advisory fee, or we will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when you have given our firm written authorization permitting the fees to be paid directly from your account. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy. We will also receive a duplicate copy of your account statements.

You may terminate the portfolio management agreement upon 30-days' written notice to our firm. You will incur a pro rata charge for services rendered prior to the termination of the portfolio management agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client.

We encourage you to reconcile our invoices with the statement(s) you receive from the qualified custodian. If you find any inconsistent information between our invoice and the statement(s) you receive from the qualified custodian please call our main office number located on the cover page of this brochure.

Additional Fees and Expenses

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through which your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to the "Brokerage Practices" section of this Disclosure Brochure.

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

We do not accept performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Our fees are calculated as described in the *Advisory Business* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Item 7 Types of Clients

We offer investment advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, and other business entities.

In general, we do not require a minimum dollar amount to open and maintain an advisory account; however, we have the right to terminate your Account if it falls below a minimum size which, in our sole opinion, is too small to effectively manage.

As described above in the *Fees and Compensation* section of this brochure at Item 5, we do require a non-negotiable minimum annual fee for portfolio management services.

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

Our Methods of Analysis and Investment Strategies

We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

- *Fundamental Analysis*- involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared

to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

- **Long-Term Purchases** - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and various other factors. Your restrictions and guidelines may affect the composition of your portfolio.

Tax Considerations

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Moreover, as a result of revised IRS regulations, custodians and broker-dealers will begin reporting the cost basis of equities acquired in client accounts on or after January 1, 2011. Your custodian will use the FIFO accounting method as the default method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, please provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Please note that decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Recommendation of Particular Types of Securities

As disclosed under the "Advisory Business" section in this Brochure, we primarily recommend mutual funds, exchange traded funds, collective investment trusts and regarding sub accounts of group annuities that are used in a pension plan however, we may recommend other types of investments as appropriate for you since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

Mutual funds and exchange traded funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative

companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. Exchange traded funds differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely which can dilute other investors' interests. Depending on the type of fund, other risks may or may not be present including, but not necessarily limited to: Market Risk; Foreign Securities and Currencies Risk; Derivatives; Securities Lending; Interest Rate Risk; Credit Risk; Income Risk; and, Call Risk.

Collective Investment Trusts (CITs) are tax-exempt, pooled investment vehicles sponsored by a bank or trust company exclusively for qualified plans, including 401(k)s, as well as for certain types of government plans. Plan sponsors can offer participants trusts with a variety of investment objectives, including target date funds. For some trusts, independent money managers are hired to sub-advise these trusts in a manner that reflects the investment objective of the trust. For others, the trust's assets are invested in shares of mutual funds or exchange-traded funds (ETFs) in a manner that reflects the trust's investment objective. CITs' fees on average are 40 to 50 percent lower than actively management mutual funds. CITs are less likely to provide their pricing data in newspapers and on websites, although monthly investment returns and daily trust unit values are generally found on the participant website. Participants can't roll over their CIT-balances when they leave the 401(k) because the trusts do not trade on open markets. Consequently, the participant must choose between leaving the assets with the previous employer (if permitted) or liquidating your CIT holdings and then rolling over the cash position to the new employer's plan or an IRA. Although CITs are not subject to the Investment Company Act of 1940 and are not registered, they are not unregulated. In the U.S., collective trusts are subject to banking regulations and are supervised by the Office of the Comptroller of the Currency (OCC), unlike mutual funds that are regulated by the SEC. The Pension Protection Act of 2006 approved CITs as default investment options for defined contribution plans.

Item 9 Disciplinary Information

QP Consulting has been registered and providing investment advisory services since 2002. Neither our firm nor any of our Associated Persons has any reportable disciplinary information.

Item 10 Other Financial Industry Activities and Affiliations

We have not provided information on other financial industry activities and affiliations because we do not have any relationship or arrangement that is material to our advisory business or to our clients with any of the types of entities listed below.

1. broker-dealer, municipal securities dealer, or government securities dealer or broker;
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund);
3. other investment adviser or financial planner;
4. futures commission merchant, commodity pool operator, or commodity trading advisor;
5. banking or thrift institution;
6. accountant or accounting firm;
7. lawyer or law firm;
8. insurance company or agency;
9. pension consultant;

- 10. real estate broker or dealer; and
- 11. sponsor or syndicator of limited partnerships.

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

Description of Our Code of Ethics

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our Associated Persons are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Our Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting Mark Ivceвич at (301) 326-1521.

Participation or Interest in Client Transactions

Neither our firm nor any of our Associated Persons has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this Brochure.

Personal Trading Practices

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our Associated Persons nor we shall have priority over your account in the purchase or sale of securities.

Item 12 Brokerage Practices

We maintain relationships with several broker-dealers, such as TD Ameritrade Institutional, MG Trust, John Hancock, Ascensus Trust, Great West Life & Annuity, Reliance Trust, Fidelity Trust and Mid-Atlantic Trust. However, we may establish new relationships depending on client needs or may work with others as directed by the plan's established service provider relationships. While you are free to choose any broker-dealer or other service provider, we generally recommend that you establish an account with a brokerage firm with which we have an existing relationship, as such relationships may include benefits provided to our firm, including but not limited to, research, market information, and administrative services that help our firm manage your account(s). We believe that the broker-dealers with which we have established business relationships provide quality execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by such broker-dealers, including the value of research provided, the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm.

The research, other products or services are not provided to us in connection with specific client securities transactions and are not considered to be paid for with so-called "soft dollar" credits. However, the research, other products or services received benefit us because we do not pay for those benefits. Such benefits are provided free of charge to us and other registered investment adviser's utilizing the custodial and brokerage services offered by such broker-dealers. The products and

services we receive from various broker-dealers will generally be used in servicing all of our clients' accounts and will not depend on your choice of a particular broker-dealer or other third-party service provider. In recognition of the value of research services and additional brokerage products and services such broker-dealers provide, you may pay higher commissions and/or trading costs than those that may be available elsewhere. Therefore, you should be aware that the receipt of economic benefits by our firm is a perceived conflict of interest as we may have an economic incentive to recommend a broker-dealer based on our interest in receiving research or other products or services, rather than based solely on your interest in receiving most favorable execution costs.

Research and Other Soft Dollar Benefits

We do not receive any soft dollar benefits from any brokerage firm we recommend.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Directed Brokerage

We routinely recommend that you direct our firm to execute transactions through one of the brokerage firms with whom we maintain relationships. As such, we may be unable to achieve the most favorable execution of your transactions and you may pay higher brokerage commissions than you might otherwise pay through another broker-dealer that offers the same types of services. Not all advisers require their clients to direct brokerage.

In limited circumstances, and at our discretion, some clients may instruct our firm to use one or more particular brokers for the transactions in their accounts. If you choose to direct our firm to use a particular broker, you should understand that this might prevent us from effectively negotiating brokerage commissions on your behalf. This practice may also prevent our firm from obtaining favorable net price and execution. Thus, when directing brokerage business, you should consider whether the commission expenses, execution, clearance, and settlement capabilities that you will obtain through your broker are adequately favorable in comparison to those that we would otherwise obtain for you.

Block Trades

We do not combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading") because we are not utilizing individual stocks or bonds in our recommendations and, therefore, there is no benefit in block trading.

Item 13 Review of Accounts

Mark Ivceвич, Owner of QP Consulting, or another qualified investment adviser representative will monitor your accounts on a periodic basis and will conduct account reviews at least quarterly to ensure the advisory services provided to you and that the portfolio mix are consistent with your stated investment needs and objectives. Additional reviews may be conducted based on various circumstances, including, but not limited to:

- contributions and withdrawals,
- year-end tax planning,
- market moving events,
- security specific events, and/or,
- changes in your risk/return objectives.

We will provide you with additional or regular written reports in conjunction with account reviews. Reports we provide to you will contain relevant account and/or market-related information such as an inventory of account holdings and account performance. You will receive trade confirmations and monthly or quarterly statements from your account custodian(s). At your request, we may meet with you and/or your third-party money manager(s) to discuss asset allocation, but we will not make recommendations regarding specific investments or provide any regular written reports to you.

Item 14 Client Referrals and Other Compensation

We do not receive any compensation from any third party in connection with providing investment advice to you nor do we compensate any individual or firm for client referrals.

Refer to the *Brokerage Practices* section above for disclosures on research and other benefits we may receive resulting from our relationship with your account custodian.

Item 15 Custody

As paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy. We will also provide statements to you reflecting the amount of advisory fee deducted from your account.

You should compare our statements with the statements from your account custodian(s) to reconcile the information reflected on each statement. If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact Mark Ivceвич at (301) 326-1521.

Item 16 Investment Discretion

Before we can buy or sell securities on your behalf, you must first sign our discretionary management agreement, a power of attorney, and/or trading authorization forms.

You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Please refer to the "Advisory Business" section in this Brochure for more information on our discretionary management services.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s).

Item 17 Voting Client Securities

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

Item 18 Financial Information

We are not required to provide financial information to our clients because we do not:

- require the prepayment of more than \$500 in fees and six or more months in advance, or
- take custody of client funds or securities, or
- have a financial condition that is reasonably likely to impair our ability to meet our commitments to you.

Item 19 Requirements for State-Registered Advisers

Our firm is registered with the United States Securities and Exchange Commission and is not required to respond to this section. Please refer to the Form ADV Part 2B Brochure Supplements for background information about management personnel and those giving advice on behalf of our firm.

Item 20 Additional Information

Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will never sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact Mark Ivceovich, Owner, at (301) 326-1521. If you have any questions regarding this policy.

Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, you will keep the profit.