

Item 1: Title Page

March 30, 2021

The Brochure for

Van Strum & Towne, Inc.
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San Francisco, CA 94111
415.981.3455
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VAN STRUM & TOWNE
INVESTMENT COUNSEL - FOUNDED 1927



This brochure provides information about the qualifications and business practices of Van Strum & Towne, Inc. If you have any questions about the contents of this brochure, please contact us at 415.981.3455. 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. **Registration with the Securities and Exchange Commission does not imply a certain level of skill or training.**

Additional information about Van Strum & Towne, Inc. also is available at the SEC's website at www.adviserinfo.sec.gov.

Item 2: Material Changes

There have been no material changes since our last filing on September 25, 2020.

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Item 4: Advisory Business

- A. Van Strum & Towne is an independent investment advisory firm wholly owned by its officers. The firm was founded in 1927. Our income is derived solely from professional fees for managing assets. We are registered with the Securities and Exchange Commission under the Investment Advisors Act of 1940 and are members of the Investment Advisor Association. The firm has two equal owners and portfolio managers: James L. Collins, CFA and Barbara A. Wright, CFA.

Each of the firm's professional staff is evaluated on the basis of his or her education and work experience. Van Strum & Towne requires that all principals have a college degree and comprehensive knowledge of investments, banking, and finance. In addition, any associated persons involved in determining investment strategy or giving investment advice to clients must pass the Series 65: Uniform Investment Adviser Law Examination. Both of the firm's principals have college degrees, have passed the Series 65 Uniform Investment Adviser Law Examination and are CFA Charterholders.

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by the CFA Institute which is the largest global association of investment professionals.

To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join the CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

The three levels of the CFA Program test proficiency within a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA Charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

- B. Most of our clients are high net-worth individuals. We also manage non high net-worth individual and institutional accounts including foundation, partnership, IRA, 401(k), pension and profit-sharing accounts. We do not manage wrap accounts. Accounts under management are both discretionary and non-discretionary.

The size of our firm gives us the flexibility to act on investment opportunities in a timely manner and provides our portfolio managers the time and resources needed to work closely with clients. Our firm's portfolio managers work collaboratively to determine investment strategy, asset-mix guidelines, and maintain an approved list of securities.

Our portfolio management responsibilities focus on achieving client objectives and controlling portfolio risk. We do this by selecting equity investments in companies that we believe will achieve success over the long term. We also emphasize bond investments in entities that we deem to be of high quality. We do not provide investment advice for derivative instruments structure securities.

Our investment process is characterized by low portfolio turnover though we are organized to act quickly when conditions warrant.

Services provided to clients may include:

- Retirement plan analysis
- Financial planning
- Asset allocation
- Investment Policy Analysis
- Ongoing portfolio review
- Other investment or financial asset review

- C. The investment advisory relationship begins with the investment management agreement between Van Strum & Towne and the client, which sets forth pertinent information concerning management of an account. Either party, upon written notice, may unilaterally terminate the investment advisory relationship.

Our first objective in working with a new client is to understand fully a client's unique financial profile, investment objectives and specific requirements. This understanding enables us to work closely with clients to develop an investment strategy that defines realistic investment objectives, designed to meet client-specific needs. We establish the asset-mix in an effort to achieve realistic, long-term investment objectives. This iterative process, which requires ongoing communication with clients, enables us to position client portfolios to benefit from long-term growth in the investment markets.

Clients may impose restrictions on investing in specific securities, companies, or industries. We rely on our clients to update us about changes in their investment circumstances or risk tolerance that may impact their portfolio asset mix decision or liquidity requirements.

We encourage frequent contact with clients and their tax, legal and other professional advisors. We provide our clients with written quarterly portfolio appraisal reports as well as year-end capital transaction reports. We have the capability to tailor our reports and their frequency to meet client requirements.

- D. Van Strum & Towne does not participate in wrap fee programs.

- E. As of December 31, 2020 our firm managed approximately \$345 million on behalf of 97 clients, with \$302 million in discretionary assets and \$43 million in non-discretionary assets.

Item 5: Fees and Compensation

- A. Van Strum & Towne earns the majority of its fees based on a percentage of the market value of assets under management.

The following fee structure applies, but other arrangements, including fixed fees, are possible given the specifics of an account:

1% on first	\$2,000,000
3/4% on next	\$3,000,000
1/2% on next	\$5,000,000
Negotiable above	\$10,000,000
Minimum Fee	\$20,000

All fees are negotiable at Van Strum & Towne's sole discretion subject to the particular circumstances of each client.

- B. Fees are billed quarterly and may be deducted directly from the client account or paid directly by the client. Clients may select either method of payment.
- C. Fees associated with money market funds, exchange traded funds, mutual funds, and other funds are paid by the client in addition to Van Strum & Towne's fee. The client also pays other fees such as custodian fees, trustee fees, and commissions. Please see Item 12 for a discussion of brokerage arrangements.
- D. Invoices are neither presented nor payable in advance of services rendered. If an investment management agreement is terminated mid billing period the management fee is pro-rated to cover only the days of the billing period prior to the termination date.
- E. Supervised persons are not compensated for the sale of securities or investment products.

Item 6: Performance-Based Fees and Side-by-Side Management

Van Strum & Towne does not charge performance-based fees.

Item 7: Types of Clients

Van Strum & Towne provides investment counsel and wealth management services to high net-worth individuals, individuals, trusts, foundations, endowments, IRAs, 401 (k) plans, partnerships, and pension and profit-sharing plans.

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

A.

Methods of Analysis:

Van Strum & Towne's primary method of security analysis is fundamental analysis which is discussed in detail below under Common Stock Investing. The firm may supplement fundamental analysis with technical, charting and cyclical analysis. The sources of our analytical materials include annual reports, prospectuses, SEC filings, company press releases and other corporate presentations, financial newspapers, magazines and journals, corporate rating services, and research materials prepared by others.

Investment Strategy:

Our investment philosophy is based on principles of capital preservation, growth of capital, and minimization of risk.

Van Strum & Towne's investment strategy is dictated by each client's unique circumstances. We invest according to client objectives. Client portfolios may include investments in common stocks, preferred stocks, convertible securities, warrants, real estate investment trusts or limited partnerships, oil and gas limited partnerships, certificates of deposit, money market funds, mutual funds, exchange traded funds, corporate bonds, municipal bonds, United States Treasury and United States Government Agency bonds.

Van Strum & Towne does not use leverage as part of its investment strategy, although clients may request an account be placed on margin. The client must sign a margin account application with the broker-dealer when the margin account is opened. Van Strum & Towne's investment approach generally emphasizes long-term holding periods. Van Strum & Towne may at times take action or give advice to any of our clients that differs from actions and/or advice given to other clients.

Our investment approach primarily emphasizes common stock and fixed income investments, which are further discussed below.

Common Stock Investing:

Van Strum & Towne uses fundamental analysis when selecting common stocks. This analysis considers a company's historical and prospective earnings and earnings growth, financial strength, valuation, and overall ability to generate future cash flow. These factors are key inputs in the investment decision-making process for common stock investments. Where appropriate, we invest in selected smaller companies when they offer

unusual opportunities for capital appreciation. Van Strum & Towne may review technical analysis and charting research, but these tools are not primary inputs.

Fixed Income Investing:

Van Strum & Towne selects fixed income investments according to client objectives and tax circumstances. We emphasize investment grade securities using tools such as issuer financial statements and reports, rating agency reports, prospectuses, and historical pricing analysis.

Exchanged-Traded, Closed End and Mutual Funds Investing:

Van Strum & Towne utilizes these funds in some instances to gain access to certain markets or asset classes. For example, while we may view some fixed-income or equity classes as too risky for individual security selection we may determine they are investable if purchased through a diversified basket of securities in one of these fund types.

Through its investment strategies, methods of analysis and understanding of individual client circumstances Van Strum & Towne seeks to mitigate investment risk. However, investing in any type of security involves risk of loss that clients should be prepared to bear.

B. Risks associated with our investment strategy include, but are not limited to:

Event risk – the risk that low probability, high magnitude events have on markets and individual securities. Examples include, but are not limited to, such events as natural disasters, pandemics, epidemics, and geopolitical events that have outsized impacts on the economy and financial markets.

Risk of loss – the risk that an investment loses a portion of or its entire value and is deemed worthless.

Market risk – the risk any security experiences due to changes in the broad economy or its respective industry.

Entity specific risk – the risk specifically associated with one entity and its management.

Interest rate risk – the risk that a portfolio of fixed income investments fluctuates with changes in interest rates.

Reinvestment risk - the risk investors bear when forced to reinvest proceeds from fixed income securities that have matured or been called in a lower interest rate environment than when the securities were originally purchased.

Liquidity risk – the risk that the ability to convert a security to cash is greatly diminished due to market dislocations or supply/demand imbalances.

Default risk – the risk that an issuer of a fixed income investment is unable or unwilling to pay scheduled interest or principal payments.

Litigation risk – the risk that major litigation harms an investment’s intrinsic value.

Currency risk – the risk that relative changes in currencies and interest rates may adversely affect the intrinsic value of a security.

Fraud risk – the risk that a material fraud adversely impacts the intrinsic value of a security.

Cyber Risk – the risk that a cyberattack materially disrupts or disables not only the ability of a company to deliver its products or services to the market, but also includes potential breaches of systems at client custodians, or other third-party providers.

- C. Van Strum & Towne invests primarily in money market funds, common stocks of publicly traded companies, exchange-traded, closed end and mutual funds, and fixed income securities. The material risk of investing in common stocks and/or fixed income securities is total principal loss. The general risks associated with these investments relate to event risk, liquidity risk, counterparty risk, and market risk as described above in Item 8 B.

Item 9: Disciplinary Information

There are no disciplinary violations to report for Van Strum & Towne, Inc. or its management personnel.

Item 10: Other Financial Industry Activities and Affiliations

- A. Neither Van Strum & Towne nor any of its management persons are registered or have an application pending to register as a broker-dealer or registered representative of a broker-dealer.
- B. Neither Van Strum & Towne nor any of its management persons are registered or have an application pending to register as a futures commission merchant, commodity pool operator, a commodity-trading advisor, or an associated person of the foregoing entities.
- C. Neither Van Strum & Towne or any of its management persons have any material business or financial industry relationships that would present a possible conflict of interest for our advisory business or clients.
- D. Van Strum & Towne does not recommend other investment advisers to our clients for compensation.

Item 11: Code of Ethics

- A. Van Strum & Towne is engaged in a highly confidential, personal service business. The firm is regulated by the Securities and Exchange Commission as well as several state agencies. All employees are required to comply with applicable federal securities laws, including the Securities and Exchange Acts of 1933 and 1934 as well as the Investment Advisers Act of 1940. The firm's Code of Ethics articulates standards of conduct expected of all employees to ensure adherence to our responsibilities as fiduciaries. A fiduciary is a person or entity in a position of trust that owes a duty of loyalty and care to another person or entity. A fiduciary is expected to act in an honest and good faith manner with regard to all client matters. Other topics covered in the Code of Ethics include privacy, personal trading, insider trading, and general standards of conduct.

A copy of Van Strum & Towne's complete Code of Ethics is made available to clients and prospective clients upon request.

- B. Van Strum & Towne and its related persons do not recommend to clients, or buy and sell for client accounts, securities in which the firm or related person has a material financial interest.
- C. Van Strum & Towne and its related persons may invest in the same securities for its personal accounts that it recommends to clients. As a fiduciary, Van Strum & Towne is required to place the interests of clients above the interests of the firm or its related persons' own interests. To address and mitigate possible conflicts of interest when trading in personal accounts, Van Strum & Towne has instituted policies and procedures that establish guidelines for employees to receive pre-clearance prior to placing trades in their personal accounts. All employees require pre-clearance for IPOs and private placements and for any single trade greater than \$50,000 if the security is held in client accounts. Van Strum & Towne monitors compliance with these guidelines by reviewing employees' monthly brokerage statements.
- D. In addition to the guidelines for trading in personal accounts discussed in Item 11 C above to address and mitigate possible conflicts of interest when trading in client and personal accounts at or about the same time, Van Strum & Towne may declare blackout periods for a particular security which prohibits employees from trading those securities during that period. Van Strum & Towne monitors compliance with this guideline by reviewing employees' monthly brokerage statements.

Item 12: Brokerage Practices

- A. Van Strum & Towne may suggest custodians or broker-dealers to clients based on such factors as the size of the account, service requirements, and trading activity. Van Strum & Towne also considers the reasonableness of commissions, administrative support, and other services provided by the custodian or broker-dealer to the client.

Further consideration is given to the following factors:

- Capability to execute, clear, and settle trades
- Capability to facilitate transfers and payments to and from accounts
- Breadth of available investment products
- Availability of investment research and tools that assist us in making investment decisions
- Competitiveness of the price of those services
- Reputation, financial strength, security and stability

In executing transactions for discretionary accounts, Van Strum & Towne selects broker-dealers with the objective of obtaining the best available price and most favorable execution ("best execution") for each transaction. In selecting broker-dealers, Van Strum & Towne uses its judgment in determining which broker-dealers provide the best overall execution or services for a given transaction. To achieve best execution, investment advisers are not required to select the broker-dealers that offer the lowest possible commissions, but instead are required to evaluate a broad array of criteria such as financial stability, responsiveness, back-office capabilities, confidentiality, and any other factors that affect the overall value received by the client in exchange for the brokerage commissions.

1. Research and Other Soft Dollar Benefits

Van Strum & Towne may select certain broker-dealers with the intent of directing enough brokerage to receive research and services directly related to the investment decision-making process. Van Strum & Towne would have to purchase the research and services if it did not direct client brokerage to certain broker-dealers. This fact creates an inherent conflict between the client's desire for the lowest possible commission and Van Strum & Towne's need for research and services that benefit all its clients. Van Strum & Towne determines in good faith that it receives best execution and that commissions paid are reasonable in relation to the value received.

In exchange for brokerage commissions, broker-dealers provide investment information and research services such as reports on domestic and global economic trends, industry analysis, specific individual companies, regulatory updates, tax law changes, and other information that may affect the investment management decision-making process. Such research includes advice, given either directly or through publications or writings, as to the value of securities, and advisability of investing in, purchasing or selling securities, and the availability of securities or purchasers or sellers of securities.

Additionally, a relationship exists between Van Strum & Towne and a broker-dealer under which a portion of client brokerage commissions are used to pay for software that integrates and automates the investment management process and facilitates data integration. This software is considered a "mixed-use" product and as such Van Strum & Towne makes a reasonable allocation of the total cost of the software to be

paid through commission dollars. A "mixed-use" product is defined as services or products provided to an investment manager by a broker-dealer through a brokerage arrangement that has the capacity to be used in both the investment decision-making process and the management of the firm.

Charles Schwab Products and Services Available to Van Strum & Towne

Charles Schwab Advisor Services is Schwab's business serving independent investment advisory firms like Van Strum & Towne. They provide our firm and our clients with access to its institutional brokerage trading, custody, reporting, and related services many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help Van Strum & Towne manage or administer our clients' accounts, while others help our firm manage and grow our business.

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which Van Strum & Towne might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

Schwab also makes available to Van Strum & Towne other products and services that mainly benefit our firm. These products and services assist Van Strum & Towne in managing and administering our clients' accounts and operating our firm. They include investment research, both Schwab's own and that of third parties. We use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (e.g., duplicate trade confirmations and statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

The availability of these services from Schwab benefits our firm because we do not have to produce or purchase them. We do not have to pay for Schwab's services. These services are not contingent upon our firm committing any specific amount of business to Schwab in trading commissions or assets in custody. The fact that we receive these benefits from Schwab is an incentive for our firm to recommend the use of Schwab rather than making such a decision based exclusively on our client's interest in receiving the best value in custody services and the most favorable execution of client transactions. This is a potential conflict of interest.

2. Brokerage for Client Referrals

Van Strum & Towne does not direct brokerage to certain broker-dealers for client referrals.

3. Directed Brokerage

Van Strum & Towne also periodically places trades through specific broker-dealers as directed by clients ("directed brokerage"). In requiring Van Strum & Towne to execute transactions through a specific broker-dealer, the client is made aware they may pay higher commissions or receive less than best execution than clients who do not since directed brokerage negatively impacts Van Strum & Towne's ability to negotiate commissions for the client.

B. Trade Order Aggregation

Periodically, Van Strum & Towne aggregates securities sale and purchase orders when it wants to make those transactions in all or many client accounts. Aggregated transactions result in the same price and commission fee for each account in the aggregated transaction resulting in a more equitable result than could be achieved through separate transactions.

Item 13: Review of Accounts

- A. Van Strum & Towne reviews the investments in client accounts on a continuous basis. Clients can discuss their investment portfolios, financial circumstances, and asset mix at any time either through an in-person meeting or conference call.

Our internal portfolio review and control procedures are designed to ensure that we are meeting client objectives and include an assessment of asset mix, diversification, price of securities, cash management, risk characteristics, and individual issues held. We rely on clients to update us on changes to their financial circumstances.

Van Strum & Towne's portfolio managers, all of whom are actively involved with clients, are responsible for the ongoing review of accounts. Account reviews are collaborative and involve an assessment as to whether portfolios are aligned with client objectives, asset mix, and other portfolio requirements.

- B. Van Strum & Towne reviews client accounts on a continuous basis.
- C. Van Strum & Towne's written and oral reports to clients provide a comprehensive description of their investment portfolio's performance and status. Clients receive quarterly portfolio appraisals that describe their holdings, transactions and gain and loss summaries.

Item 14: Client Referrals and Other Compensation

- A. Van Strum & Towne does not compensate any non-client person or entity for client referrals.
- B. Neither Van Strum & Towne nor any of its related persons compensate any person who is not a supervised person for client referrals.

Item 15: Custody

Van Strum & Towne has custody of certain client assets and is also engaged as the investment manager for those assets. Additionally, Van Strum & Towne does, in certain instances, have limited power of attorney to automatically deduct management fees directly from a client's account.

All clients receive monthly or quarterly statements from qualified custodians or broker dealers as well as quarterly Van Strum & Towne statements that explicitly urge clients to compare the statements received directly from their qualified custodian or broker-dealer to Van Strum & Towne's statements.

Item 16: Investment Discretion

The majority of clients grant Van Strum & Towne discretionary authority over managed assets, subject to specific client objectives and restrictions. This authority is detailed in the investment management agreement. Most clients generally grant Van Strum & Towne a limited power of attorney to execute trades and deduct management fees via qualified custodian or broker-dealer account applications or qualified custodian or broker-dealer specific LPOA agreements. If an account is discretionary, Van Strum & Towne will make and implement investment decisions, including which securities are purchased and sold, when these securities are purchased and sold, and the total amount of securities to be purchased and sold. These transactions will be made in accordance with Van Strum & Towne's understanding of the client's objectives, circumstances, and restrictions and without prior consultation with the client. Clients may impose restrictions on investing in specific securities, companies, or industries.

Item 17: Voting Client Securities

- A. Van Strum & Towne's authority to vote client securities is established in our investment management agreement executed with each client. Our proxy voting policies and procedures are summarized in the investment management agreement and the client either appoints or does not appoint Van Strum & Towne to vote proxies.

Van Strum & Towne does not employ proxy advisory firms. Portfolio managers are responsible for voting proxies. Generally, votes are cast in favor of proposals that maintain or strengthen the interests of shareholders. Votes are cast against proposals deemed to have the opposite effect. In the event of a potential conflict of interest, the portfolio manager meets with the firm's Investment Policy Committee to determine an appropriate course of action. If the Investment Committee determines that a conflict exists, the client is then contacted and the conflict disclosed. Clients have the right to inquire how Van Strum & Towne votes a particular proxy and may obtain a copy of our written proxy voting policies and procedures upon request. Clients may also request that Van Strum & Towne vote a proxy in a specific manner assuming that sufficient advance notice is given.

- B. Clients may retain the right to vote their proxies if they so choose. In this case, clients will receive their proxies directly from the custodian or broker-dealer. Clients may contact Van Strum & Towne for advice but the ultimate authority to vote the proxy remains with the client.

Item 18: Financial Information

- A. Van Strum & Towne does not require or solicit prepayment of fees and therefore is not required to include an audited balance sheet with this brochure.
- B. Van Strum & Towne has custody of certain client assets. Van Strum & Towne does not require or solicit prepayment of fees. Van Strum & Towne has discretionary authority and is unaware of any financial condition that is reasonably likely to impair our ability to meet our contractual commitments to clients.
- C. Van Strum & Towne has not been the subject of a bankruptcy petition within the last ten years.

March 30, 2021

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Part 2B of Form ADV, Brochure Supplement

For

James L. Collins, CFA

This brochure supplement provides information about James L. Collins that supplements the Van Strum & Towne brochure. You should have received a copy of that brochure. Please contact Lynda A. Seaman if you did not receive Van Strum & Towne's brochure or if you have any questions about the contents of the supplement.

Additional information about James L. Collins is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

James L. Collins, CFA was born in 1975 and graduated *summa cum laude* with a Bachelor of Arts degree from Bowdoin College, Brunswick, ME in 1997.

James is a CFA Charterholder. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

James joined Van Strum & Towne in 1998. In addition to his primary role as a portfolio manager, he also serves as Van Strum & Towne's Chairman.

Item 3: Disciplinary Information

No violations to report.

Item 4: Other Business Activities

No other business activities to report.

Item 5: Additional Compensation

No additional compensation arrangements to report.

Item 6: Supervision

Two individuals equally own Van Strum & Towne. Each owner is responsible for the supervision of the other owner. The individual responsible for supervising James L. Collins is as follows:

Barbara A. Wright, Principal

They may be contacted at 415.981.3455 if you have any questions.

Item 7: Requirements for State-Registered Advisers

This question is not applicable as Van Strum & Towne is not a state-registered adviser.

March 30, 2021

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Part 2B of Form ADV, Brochure Supplement

For

Barbara A. Wright, CFA

This brochure supplement provides information about Barbara A. Wright that supplements the Van Strum & Towne brochure. You should have received a copy of that brochure. Please contact Lynda A. Seaman if you did not receive Van Strum & Towne's brochure or if you have any questions about the contents of the supplement.

Additional information about Barbara A. Wright is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Barbara A. Wright, CFA was born in 1960. Barbara graduated from Stanford University in 1982 with a Bachelor of Arts in Economics. She earned a Master of Business Administration (MBA) in 2000 from The Leavey School of Business at Santa Clara University. Barbara received her CFA charter in 2004.

To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Barbara joined Van Strum & Towne in 2000. In addition to her primary role as a portfolio manager, she also serves as Van Strum & Towne's Corporate Secretary and Treasurer.

Item 3: Disciplinary Information

No violations to report.

Item 4: Other Business Activities

No other business activities to report.

Item 5: Additional Compensation

No additional compensation arrangements to report.

Item 6: Supervision

Two individuals equally own Van Strum & Towne. Each owner is responsible for the supervision of the other owner. The individual responsible for supervising Barbara A. Wright is as follows:

James L. Collins, Principal

They may be contacted at 415.981.3455 if you have any questions.

Item 7: Requirements for State-Registered Advisers

Van Strum & Towne is not a state-registered adviser.