

## Item 1

### LeJeune Puetz Investment Counsel LLC

13721 West Bay Shore Drive  
Traverse City, MI 49684  
Phone: (231) 922-0525  
Fax: (231) 922-0787  
Website: [www.lejeunepuetz.com](http://www.lejeunepuetz.com)  
Email: [john@lejeunepuetz.com](mailto:john@lejeunepuetz.com)

#### **Firm Brochure** (Part 2A of Form ADV)

This brochure provides information about the qualifications and business practices of LeJeune Puetz Investment Counsel LLC (also referred to as “LPIC”). If you have any questions about the contents of this brochure, please contact us at (231) 922-0525 or by email at [john@lejeunepuetz.com](mailto:john@lejeunepuetz.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“S.E.C.”) or by any state securities authority.

Additional information about LeJeune Puetz Investment Counsel LLC also is available on the S.E.C.’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

Depending on the level of assets under management, LeJeune Puetz Investment Counsel LLC will be registered by either the S.E.C. and/or the State of Michigan as an investment advisor. However, registration with either the S.E.C. or the State of Michigan does not imply a certain level of training. Our expertise is described later in this brochure.

March 19, 2021

## Item 2

### Material Changes

The S.E.C. issued a final rule in July 2011 requiring investment advisors to provide a Firm Brochure in narrative “plain English” format. This new final rule identifies sections of an advisor’s business which needs to be discussed. This narrative brochure of our form ADV Part 2 reflects the final rule.

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure. There have been no material changes since the last brochure update on March 12, 2020.

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us at (231) 922-0525 or by email at [john@lejeunepuetz.com](mailto:john@lejeunepuetz.com).

Item 3

Table of Contents

Item 2 Material Changes .....	1
Item 3 Table of Contents .....	2
Item 4 Advisory Business .....	3
Item 5 Fees and Compensation .....	4
Item 6 Performance-Based Fees and Side-By-Side Management .....	5
Item 7 Types of Clients .....	5
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss .....	6
Item 9 Disciplinary Information .....	7
Item 10 Other Financial Industry Activities and Affiliations .....	7
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	8
Item 12 Brokerage Practices .....	10
Item 13 Review of Accounts .....	11
Item 14 Client Referrals and Other Compensation .....	12
Item 15 Custody .....	12
Item 16 Investment Discretion .....	13
Item 17 Voting Client Securities .....	13
Item 18 Financial Information .....	13

## **Item 4 Advisory Business**

### **Firm Description:**

LeJeune Puetz Investment Counsel LLC (“LeJeune Puetz” or “LPIC”) had its beginnings in 1988 when Dennis LeJeune began providing investment services to clients as a fee-only investment advisor. LeJeune Puetz Investment Counsel LLC was officially formed in 1997 when John Puetz was admitted as a member/partner.

As an independent advisor, LeJeune Puetz Investment Counsel LLC is able to remain objective in its investment advice. We provide investment advisory services to individuals, trusts, foundations, and corporations by creating customized portfolios based on each client’s needs. Portfolios are structured to meet each client's standards for income, safety, and liquidity. We are able to maintain long-term relationships with clients as a result of incorporating each investor's unique circumstances into an investment plan.

Currently, John Puetz is the sole owner and portfolio manager for LeJeune Puetz Investment Counsel LLC.

### **Types of Advisory Services:**

LeJeune Puetz Investment Counsel LLC supervises and manages clients’ investment portfolios as we assist them in reaching their investment objectives. We customize each client’s portfolio in a manner designed to achieve their investment goals within their time horizons while considering their risk levels. We utilize securities such as individual stocks, government, corporate, and municipal bonds, exchange traded funds, money markets, mutual funds, etc. to meet these objectives.

### **Tailored Relationships:**

LeJeune Puetz Investment Counsel LLC endeavors to customize each client’s portfolio based on his/her stated needs and desires. In our initial meeting, we establish the criteria for investing. After determining the appropriate asset allocation and risk tolerance, we construct each client’s portfolio by selecting various securities to meet these goals. In the case of a client expressing a moral objection to certain investments (for example, tobacco companies), we will avoid these investments whenever possible for that specific client.

All clients give LPIC discretion to place trades without obtaining the client's specific consent. At a client's request, LPIC will hold off on placing a trade until speaking with the client. However, LPIC uses this discretion to place trades during unusual events (such as a dramatic market downturn) if the client cannot be reached.

When the client grants LeJeune Puetz Investment Counsel LLC discretion, we are responsible for the major investment decisions, including: determining the appropriate security, the amount to be bought or sold, and the broker or dealer to be used for the transaction. In general, the securities and amounts purchased or sold will be determined based on client asset allocation and investment suitability. The broker or dealer used will be selected based on best execution with respect to speed, accuracy and costs.

**Consulting Services:**

LeJeune Puetz Investment Counsel LLC provides investment advice to clients who do not wish to establish an ongoing relationship or may have a situation that does not warrant ongoing investment advice. This includes advice on only an isolated area(s) of concern such as estate planning, retirement planning, or any other specific topic. We also provide specific consultation and administrative services regarding investment and financial concerns of the client.

Consulting recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature.

**Managed Assets:**

LeJeune Puetz Investment Counsel LLC has the following assets under management as of December 31, 2020:

Discretionary Basis	\$308,954,786
Non-Discretionary Basis	<u>\$ 0</u>
Total Assets under Management	\$308,954,786

**Item 5 Fees and Compensation****Description:**

As a fee-only investment advisor, LeJeune Puetz Investment Counsel LLC strives for complete transparency in our fee structure. We bill our clients an advisory fee based on the value of their total portfolios or assets under management, which includes their money market and/or mutual fund holdings.

Our annual fees are 1.0% of assets under management but may be negotiable.

**Billing:**

We bill our clients a quarterly fee in arrears (after services are provided) based on the balance of the client's portfolio at the end of the quarter. In the case where a deposit or withdrawal in excess of 10% of the portfolio value has been made during the quarter, then the fees shall be charged on the average amount of assets in client's portfolio during that quarter. Fee invoices are mailed to our clients with our quarterly portfolio statements. Our clients may elect to pay our fees with a check or have the fees deducted from their account by signing the invoice and returning it to us. We then forward the signed document to their account custodian (Charles Schwab & Co.), who deducts the fees from the client's account and remits the fee to us.

For Consulting Services, LeJeune Puetz Investment Counsel LLC may provide investment advice to clients who do not wish to establish an ongoing relationship or may have a situation that does not warrant ongoing investment advice. These services are provided on an hourly rate and are negotiable between \$150 and \$350 per hour. LPIC also offers clients regular and continuous management services for a fixed fee. These fees are negotiable, but are typically between \$250 to \$1500 a quarter, depending on the assets under management.

**Other Fees:**

We recommend the use of Charles Schwab & Co. (“Schwab”) as the primary custodian of our clients’ accounts. Schwab does not charge separately for custody (holding and reporting on client assets). Schwab is compensated by our clients through commissions or other transaction-related fees for trades that are executed through Schwab or that settle into Schwab accounts. Also, money market, mutual, and exchange traded funds all charge advisory fees to their shareholders for management of the underlying fund assets. Therefore, clients of LeJeune Puetz Investment Counsel LLC will incur the following expenses:

- a. Quarterly fees paid to LeJeune Puetz Investment Counsel LLC (1% annual of assets under management)
- b. Commissions paid to Schwab to purchase/sell securities
- c. Fees to fund managers for ongoing management of mutual funds, money market funds, and exchanged-traded-funds

The first two set of expenses, our fees and the commissions paid to Schwab, are transparent to our clients through our fee invoices and Schwab’s trade confirmations. The fees to the underlying fund managers are withdrawn from the mutual fund assets on a daily basis and generally are not visible to our clients. We do not include that information in our account reporting package; however, it is available upon request.

LeJeune Puetz Investment Counsel LLC does not encourage its clients to pay their fees in advance. We feel that services should be provided first before clients are asked to pay for those services. This arrangement also allows us to avoid the refunding of a prepaid fee if the advisory contract is terminated before the end of the billing period.

**Compensation for Sales of Investment Products:**

LeJeune Puetz Investment Counsel LLC does not receive any compensation (cash or otherwise) for the sale of any security or investment product purchased for its clients. We believe that this arrangement creates a conflict of interest in our capacity as fiduciary and would be in contradiction to being a fee-only advisor.

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

LeJeune Puetz Investment Counsel LLC does not utilize performance-based fees nor side-by-side management due to conflicts of interest.

**Item 7 Types of Clients**

LeJeune Puetz Investment Counsel LLC provides investment advisory services to individuals, high net worth individuals, trusts, corporations and charitable foundations. For some of our clients, we manage their entire investable assets including profit sharing plans, Individual Retirement Accounts (IRAs), trusts, and joint accounts.

Our primary focus is working with high-net worth clients. We strive to develop long-term relationships with clients as a result of incorporating each investor's unique circumstances into a customized investment plan. We do not impose a minimum dollar value of assets or other conditions for opening or maintaining an account with us.

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

### **Methods of Analysis:**

LeJeune Puetz Investment Counsel LLC primarily utilizes fundamental analysis in selecting the appropriate securities for client portfolios. We rely upon information obtained from public sources, including but not limited to: financial newspapers and magazines, S.E.C. filings including annual and quarterly reports, ValueLine reports, Morningstar analysis, and other research materials prepared by others.

**Fundamental Analysis.** We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced or overpriced.

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

**Risks for all forms of analysis.** Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

### **Investment Strategies:**

LeJeune Puetz Investment Counsel LLC customizes each client's investment portfolio tailored to his/her investment goals, time horizons, and risk tolerances. We do not employ model portfolios which invest new clients in the same investment as other clients with similar profiles. Some of our clients have a 100% exposure to fixed income or bond securities; some of our clients have a 100% exposure to equity or stock securities.

For the majority of our clients, we strongly recommend a diversified portfolio of stocks, bonds, and money market funds. We utilize mutual funds or exchanged traded funds to increase diversification as these vehicles invest in a number of different securities.

We advocate buy-and-hold investing, where a security is held for a long period of time (generally at least three years or longer). Occasionally, market conditions or the investment premise of a security may change and we may sell that security before anticipated. We feel that by minimizing transaction costs and keeping fees and commissions low, our clients have a better chance of reaching their investment goals.

### **Other Risks:**

**Systematic risk:** Economic crisis, interest rates, political turmoil, recession and a host of other factors can cause systematic risk. Systematic risk affects the market as a whole. A broad range of securities in an investor's portfolio are exposed to systematic risk. This risk impacts the entire markets and cannot be mitigated through diversification.

Correlation risk is the risk that two assets will not move up or down in value as predicted. Correlation between stock price movements can also compound uncertainties. News pertaining to some stocks can trigger fluctuations in some other stocks with a high correlation.

Liquidity risk is the risk that a security is unable to be sold in a timely manner to prevent significant loss or to reap desired profits. Stocks that are traded in low volumes are referred to as illiquid and are difficult to sell.

Sector risk is the danger that the stocks of many of the companies in one sector (like health care or technology) will fall in price at the same time because of an event that affects the entire industry.

Fixed Income Risk: Bonds and bond funds will decrease in value as interest rates rise. Investment return and principal value will fluctuate so that a fixed income investment, when sold or redeemed, may be worth more or less than the original cost and potentially subject to capital gains taxes. Tax-exempt fixed income strategies invest in securities designed to pay income that is exempt from certain income taxes, but a portion of the income may be subject to federal or state income taxes or the alternative minimum tax. Federal or state changes in income or alternative minimum tax rates or in the tax treatment of municipal bonds may make them less attractive as investments and cause them to lose value.

Risk of Loss: Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

### **Item 9 Disciplinary Information**

Our firm and its employees have never been party to any legal or disciplinary action related to past or present activities.

### **Item 10 Other Financial Industry Activities and Affiliations**

Our firm and our related persons are not engaged in other financial industry activities and have no other industry affiliations.



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

### **Code of Ethics:**

LeJeune Puetz Investment Counsel LLC has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

LeJeune Puetz Investment Counsel LLC and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

LeJeune Puetz Investment Counsel LLC's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information cannot be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to [john@lejeunepuetz.com](mailto:john@lejeunepuetz.com), or by calling us at (231) 922-0525.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security (ies) which are also recommended to a client.

As these situations represent actual conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics, to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of our firm is allowed to put his or her own interest above the interest of an advisory client.

2. No principal or employee of our firm is allowed to buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
3. It is the expressed policy of our firm that no person employed by us is allowed to purchase or sell any security prior to a transaction(s) being implemented for an advisory account. This prevents such employees from benefiting from transactions placed on behalf of advisory accounts.
4. Our firm requires prior approval for any IPO or private placement investments by related persons of the firm.
5. It is our firm's policy not to engage in agency cross trades or principal trades.
6. We have established procedures for the maintenance of all required books and records.
7. All clients are fully informed that related persons may receive separate commission compensation when effecting transactions during the implementation process.
8. Clients can decline to implement any advice rendered, except in situations where our firm is granted discretionary authority.
9. All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
10. We require delivery and acknowledgement of the Code of Ethics by each supervised person of our firm.
11. Any individual who violates any of the above restrictions will be subject to termination.

## **Item 12 Brokerage Practices**

### **Selecting Brokerage Firm:**

LeJeune Puetz Investment Counsel LLC recommends that our clients establish brokerage accounts with Schwab to retain custody of clients' assets and to transact trades for their accounts. Schwab provides LeJeune Puetz Investment Counsel LLC with access to its institutional trading and custody services for its clients. These services are available to us at no charge so long as we maintain at least \$10 million of client assets at Schwab. Schwab's services include brokerage, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Schwab also makes available other products and services that are of benefit to LeJeune Puetz Investment Counsel LLC but do not necessarily benefit our clients' accounts. These products and services assist us in managing and administering our clients' accounts and include software and other technology. Schwab provides us with access to client account data (such as trade confirmations and account statements); simplified trading; research, pricing information and other market data. Schwab also handles the payment of fees from our clients' accounts and assists with back-office functions, recordkeeping and client reporting. Many of these services generally are used to service all or a substantial number of LeJeune Puetz Investment Counsel LLC's accounts, including accounts not maintained at Schwab.

Schwab also makes available to LeJeune Puetz Investment Counsel LLC other services intended to help us manage and further develop our business enterprise. These services include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance,

LeJeune Puetz Investment Counsel LLC

and marketing. In addition, Schwab may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to us. As a fiduciary, we endeavor to act in our clients' best interests. Our recommendation that clients maintain their assets in accounts at Schwab is based in part on the benefit to LeJeune Puetz Investment Counsel LLC. We also take into consideration the availability of some of the products and services that Schwab provides and not just the nature, cost or quality of custody and brokerage services provided by Schwab.

While we generally custody our clients' assets at Schwab, we are allowed to "trade away" from Schwab, meaning we can transact with other broker-dealers for our clients if it is in their best interests. As a fiduciary for our clients, we attempt to obtain the best execution for each trade transacted for our clients. Best execution usually considers the underlying cost to our clients, but also includes timeliness, liquidity, accuracy and other factors.

Clients may ask us to custody their assets at a custodian other than Schwab, which we will do if we feel that that custodian could provide the same level of assurances as Schwab.

#### **Soft Dollar Relationships:**

Within the investment advisory business, many firms have "soft-dollar benefits", where the advisory firm receives research or other benefits (technology, marketing assistance, etc.) in exchange for higher commissions paid for by their clients. At LeJeune Puetz Investment Counsel LLC, we have no soft dollar arrangements as we believe these arrangements would not be in our client's best interests.

We receive no client referrals from Schwab (or any other custodian) in exchange for recommending that our clients custody their assets at Schwab.

#### **Directed Brokerage:**

We generally do not recommend, request, or require that our clients direct us to execute their transactions through a specific broker-dealer, otherwise known as directed brokerage.

Since we endeavor to customize our client's portfolios, we generally do not aggregate or bundle the purchase or sale of securities for various clients' accounts. We will try to aggregate transactions only if it results in lower fees/commissions for each client involved.

### **Item 13 Review of Accounts**

#### **Periodic Reviews:**

All of our client accounts are reviewed continuously by John Puetz and on a quarterly basis, at minimum. In addition, clients may request a portfolio review whenever they deem necessary. During these reviews, we review asset allocation, portfolio returns compared to major indices, and many other factors which could influence the client achieving their investment goals.

#### **Factors That Trigger Review:**

When necessary, portfolio reviews are provided on a more frequent basis if market or individual investment decisions so warrant. A review is triggered by a client request, change in market conditions, changes in tax laws, or any other important changes.

LeJeune Puetz Investment Counsel LLC

**Client Reports:**

Our clients receive monthly reports from Charles Schwab and any other custodian. We also provide clients with internally generated reports on a monthly or quarterly basis. The reporting timeframe is determined by the client and LeJeune Puetz Investment Counsel LLC. Internal reports are generated and mailed to clients generally during the first 3-5 business days following the last business day of each month. With our quarterly statements, we include our Market Outlook, which includes our general thoughts on the economy, bond and stock markets.

Our individually generated report packets contain information regarding the client's holdings, portfolio returns on a historical basis for the quarter-to-date, year-to-date and past 12 months periods, and the transaction report for the past month or quarter.

Copies of our clients' internally generated reports are maintained at our office both in a hard copy and an electronic format. In addition, client statements generated from Schwab and other custodians are kept in our office in electronic format and can also be accessed through the custodian's website.

**Item 14 Client Referrals and Other Compensation****Other Compensation:**

In the financial services industry, investment professionals may receive an economic benefit other than compensation from a financial services company for promoting that company's products. For example, a mutual fund company may pay for an advisor's travel and incidental expenses to attend a conference. Since we are a fee-only advisor, LeJeune Puetz Investment Counsel LLC does not receive any economic benefits from any parties for providing investment advice or other services to our clients. We do not participate in any sales awards or other promotional activities which creates a conflict of interest with our clients.

**Solicitations:**

LeJeune Puetz Investment Counsel LLC does not compensate, directly or indirectly, any individual for soliciting client referrals.

**Item 15 Custody**

LeJeune Puetz Investment Counsel LLC is deemed to have custody of client funds or securities because we directly debit client fees and have the ability to withdraw client assets maintained with a qualified custodian upon instruction to the custodian.

Clients should receive, at minimum, a quarterly statement from the qualified custodian(s) of their advisory assets. LeJeune Puetz Investment Counsel LLC urges clients to carefully review such statements and compare such official custodial records to the account statements LeJeune Puetz Investment Counsel LLC provides to clients. Statements provided by LeJeune Puetz Investment Counsel LLC may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Please contact LeJeune Puetz Investment Counsel LLC regarding any statement discrepancies.

### **Item 16 Investment Discretion**

Our clients grant us investment discretion to manage their portfolios on their behalf by signing a discretionary advisory agreement, within defined parameters.

Once a transaction occurs in a client account, a trade confirmation is sent to the client by the custodian. Occasionally, a client will notify us that they do not want to own a particular security in his/her account after the buy transaction has been executed. Once notified, we make our best effort to correct or reverse the trade as soon as is practicable, however, any gain/loss incurred remains in the client's account.

### **Item 17 Voting Client Securities**

As shareholders of a publicly-traded company, our clients have the ability to vote on important issues presented to them by that company's Board of Directors on an annual proxy vote. These proxies can contain votes for new members of the Board, approval of auditing firms, executive compensation plans, and includes votes on transactions (such as the sale of the company or a purchase of another company).

When we initiate our relationship with a new client and establish his/her account at Schwab, we inquire whether the client desires to keep the ability to vote proxies for his/her securities. In most cases, they do not. We offer to vote the proxies for our clients and indicate this on the account application.

We then offer to discuss our voting policies and procedures with our clients. In addition, we provide a copy of our proxy voting policies to our clients when we offer a contract to them. Further, on an annual basis, we offer to our clients the ability to review our proxy voting policies or to see how we voted proxies for their securities.

In general, we only vote proxies where we feel that the vote will result in added value to the company's stock price. We do not vote proxies if the only items on the proxy are election to the Board of Directors or selection of a public accounting firm. When we do vote the proxies, we will vote in a bundled manner, i.e., all client proxies will be voted as one.

If a situation exists where there is a material conflict between LeJeune Puetz Investment Counsel LLC's interests and those of its clients, LeJeune Puetz Investment Counsel LLC will not vote on those issues. However, it is deemed highly unlikely that our interests would ever be in material conflict with those interests of our clients.

### **Item 18 Financial Information**

LeJeune Puetz Investment Counsel LLC does not have any financial impairment that will preclude the firm from meeting contractual commitments to our clients. Our firm has never been the subject of a bankruptcy petition. A balance sheet is not required to be provided because LeJeune Puetz Investment Counsel LLC does not serve as a custodian for client accounts, and does not require prepayment of investment advisory fees.