

## Item 1 – Cover Page



### **Lauterbach Financial Advisors, LLC**

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March 11, 2021

This Brochure provides information about the qualifications and business practices of Lauterbach Financial Advisors, LLC ("LFA"). If you have any questions about the contents of this Brochure, please contact us at (915) 544-6950. 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.

LFA is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about LFA also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for LFA is 114431.

## Item 2 – Material Changes

This Item of the Brochure will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. The last annual update of our brochure was March 11, 2021.

Our current Brochure contains the following material change:

- We have amended Item 8 to include additional risks for the use of interval funds.

We have also updated the Assets Under Management information of Item 4 in accordance with the filing of our Annual Updating Amendment on March 11, 2021.

(Brochure Date: 03/11/2021)

(Date of Most Recent Annual Updating Amendment: 03/11/2021)

Pursuant to SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Billy DeFrance, Chief Compliance Officer at (915) 544-6950. Our Brochure is also available on our web site [www.lfa-ia.com](http://www.lfa-ia.com) at no charge.

Additional information about LFA is available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site provides information about any persons affiliated with LFA who are registered, or are required to be registered, as investment adviser representatives of LFA.

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## **Item 4 – Advisory Business**

LFA is owned by Jon Sonnen, Suzanne Lindau, Billy DeFrance, Dan Sonnen, Stephen Rash, Scott Kobren, William Johns, Cynthia Lyons, Mark Groover, and Steve Lauterbach. The firm has been providing advisory services since 1999.

As of December 31, 20120, LFA managed \$450,573,553 on a discretionary basis and \$1,094,871 on a nondiscretionary basis, for a total of \$451,668,424 in assets under management. In addition, LFA provides advisory services to an additional \$21,808,882 in participant-directed defined contribution plans.

### **Investment Management Services**

LFA manages investment portfolios for individuals, qualified retirement plans, trusts, not-for-profits and small businesses. LFA will work with the client to determine the client's investment objectives and investor risk profile and will design a written investment policy statement. LFA uses investment and portfolio allocation software to evaluate alternative portfolio designs. LFA evaluates the client's existing investments with respect to the client's investment policy statement and works with new clients to develop a plan to transition from the client's existing portfolio to the portfolio recommended by LFA. LFA will then continuously monitor the client's portfolio holdings and the overall asset allocation strategy and hold regular review meetings with the client regarding the account as necessary.

LFA will typically create a portfolio of no-load mutual funds, and may use model portfolios if the models match the client's investment policy. LFA will allocate the client's assets among various investments taking into consideration the overall management style selected by the client. LFA primarily recommends portfolios consisting of passively managed asset class and index mutual funds, such as Dimensional Fund Advisors (DFA) mutual funds. DFA sponsored mutual funds follow a passive asset class investment philosophy with low holdings turnover. Consequently, the DFA fund fees are generally lower than fees and expenses charged by other types of funds. DFA-offered funds are only available for investment to clients of registered investment advisors that are subject to approval by DFA. This means that the termination of a client's relationship with the Firm would eliminate the ability to make additional investments in DFA funds unless the client establishes a relationship with another DFA-approved registered investment advisor.

Client portfolios may also include some individual equity securities in situations where disposition of these securities would present an overriding tax implication or the client specifically requests they be retained for a personal reason. Some such assets may be held but not considered as part of the relationship for billing or in the IPS, due to client preferences.

LFA manages mutual fund and equity portfolios on a discretionary or nondiscretionary basis. Clients may impose any reasonable restrictions on LFA's discretionary authority, including restrictions on the types of securities in which LFA may invest the client's assets and on specific securities that the client may believe to be appropriate.

LFA may also recommend fixed income portfolios to advisory clients, which consist of managed accounts of individual bonds. LFA will request discretionary authority from advisory clients to manage fixed income portfolios, including the discretion to retain a third-party fixed income manager. LFA will prepare a separate Fixed Income Investment Policy Statement for any client qualifying for separate fixed income portfolio services.

Pursuant to its discretionary authority, LFA may retain a fixed income securities manager. The fixed income securities manager will be provided with the discretionary authority to invest client assets in fixed income securities consistent with the client's Fixed Income Investment Policy Statement. The manager will also monitor the account for changes in credit ratings, security call provisions, and tax loss harvesting opportunities (to the extent that the manager is provided with cost basis information). The manager will obtain LFA's consent prior to the sale of any client securities.

On an ongoing basis, LFA will answer clients' inquiries regarding their accounts and review periodically with clients the performance of their accounts. Utilizing Drift Reports available daily, LFA will periodically review client's investment policy, risk profile and discuss the re-balancing of each client's accounts to the extent appropriate. LFA will provide to the investment manager any updated client financial information or account restrictions necessary for the investment manager to provide sub-advisory services.

### **Employee Benefit Retirement Plan Services:**

LFA also provides advisory services to participant-directed employee retirement benefit plans. LFA will analyze the plan's current investment platform, and assist the plan in creating an investment policy statement defining the types of investments to be offered and the restrictions that may be imposed. LFA will recommend investment options to achieve the plan's objectives, provide participant education meetings, and monitor the performance of the plan's investment vehicles.

LFA will recommend changes in the plan's investment vehicles as may be appropriate from time to time. LFA generally will review the plan's investment vehicles and investment policy as necessary.

For certain retirement plans, LFA also works in coordination and support with Buckingham Strategic Partners, LLC ("BSP"). Retirement plan clients will engage both LFA and BSP. BSP will provide to the client additional discretionary investment management services and will exercise

discretionary authority to select the plan investments made available to the plans' participants by selecting and maintain the plans' investments according to the goals and investment objectives of the plan.

LFA will continue to work with plans to monitor plan investments, provide fiduciary plan advice including regular considerations of the goals and objectives of the plan, and provide participant education services to the plan.

### **Additional Financial Services:**

In addition to managing the client's investment portfolio, LFA may consult with clients on various financial areas including income and estate tax matters, business sale structures, education funding, retirement planning, insurance analysis, establishment and design of retirement plans and trusts, among other things.

## **Item 5 – Fees and Compensation**

In certain circumstances, all fees, fee minimums and their applications to family circumstances may be negotiable. Accounts for members of the same family and/or related accounts may be aggregated and assessed fees on the total balance of all related accounts. Additionally, and on a case by case basis, LFA may charge its below stated advisory fee (or a negotiated fee if it has been agreed upon with client) on client's legacy positions or unmanaged assets when those assets/positions are being considered within the client's overall investment strategy.

LFA has contracted with BSP for services including trade processing, collection of management fees, record maintenance, report preparation, marketing assistance, and research. LFA has also contracted with BSP for sub-advisory services with respect to Clients' fixed income accounts. LFA pays a fee for BSP services based on management fees paid to LFA on accounts that use BSP. The fee paid by LFA to BSP consists of a portion of the fee paid by clients to LFA and varies based on the total client assets participating in BSP through LFA. These fees are not separately charged to advisory clients. As a service provider assisting with trade processing, trade errors in client accounts may be caused by BSP. According to BSP's policies, our clients will be made whole by BSP in the event of any losses caused by BSP. In addition, LFA's policy pertaining to trade errors is to always make the client whole, therefore any gains resulting from a trade error are credited to the client's account.

The specific manner in which fees are charged by LFA is established in a client's written agreement with LFA. Generally, clients will be invoiced in advance at the beginning of each calendar quarter based upon the value (market value based on independent third party sources or fair market value in the absence of market value; client account balances on which LFA calculates fees may vary from account custodial statements based on independent asset

valuations and other accounting variances, including mechanisms for including accrued interest in account statements), of the client's account at the end of the previous quarter. New accounts are charged as of the 1<sup>st</sup> day of the month following the implementation of the investment strategy.

LFA will request authority from the client to receive quarterly payments directly from the client's account held by an independent custodian. Clients may provide written limited authorization to LFA or its designated service provider, BSP, to withdraw fees from the account. Certain third-party administrators will calculate and debit LFA's fee and remit such fee to LFA. Upon client request, LFA will provide the client an invoice showing the amount of the fee, the value of the client's assets on which the fee was based, and the specific manner in which the fee was calculated. Clients should verify the accuracy of the fee calculations in such invoices. Client custodians will send at least quarterly statements directly to the client. Custodial statements will only show the amount of the advisory fee.

A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days' written notice. Upon termination of any account at any time after the required 30-day notice, any prepaid, unearned fees will be promptly refunded. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

All fees paid to LFA for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. LFA's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

These fees will generally include a management fee, other fund expenses, and a possible distribution fee. A client could invest in mutual funds directly, without the services of LFA. In that case, the client would not receive the services provided by LFA which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Certain funds also may not be available to the client directly. Accordingly, the client should review both the fees charged by the funds and the fees charged by LFA to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

## **Advisory Fees**

### **Investment Management Services**

The annual fee for investment management services will be charged as a percentage of assets under management, according to the schedule below:

<b>Assets under management</b>		<b>Annual Fee (%)</b>
On the first	\$500,000	1.25%
On the next	\$500,000	0.90%
On the next	\$1,000,000	0.70%
On the next	\$1,000,000	0.50%
On the next	\$2,000,000	0.40%
On the next	\$10,000,000	0.35%
On all amounts thereafter		0.30%

All accounts for members of the client's family (husband, wife and dependent children) or related businesses may be assessed fees based on the total balance of all accounts.

A minimum annual fee of \$5,000 is generally required for investment management and/or planning services.

LFA amended its offered fee schedule in April 2010. Clients with relationships prior to this change will be subject to their contracted fee schedule until such time as LFA and the client respectively agree to a new schedule.

### **Employee Benefit Retirement Plan Services:**

The annual fee for plan services will be charged as a percentage of assets within the plan.

<b>Assets Under Management</b>	<b>BSP's Annual Fee</b>	<b>LFA's Annual Fee</b>	<b>Total Fee</b>
On the first \$1,000,000	0.20%	0.70%	0.90%
On the next \$4,000,000	0.15%	0.45%	0.60%
On the next \$5,000,000	0.08%	0.25%	0.33%
On all amounts above \$10,000,000	0.05%	0.15%	0.20%

Clients with prior relationships may be subject to differing fee schedules.



### **Additional Financial Services:**

For additional financial services, LFA may charge an hourly fee. The hourly fee may vary depending on the advisor providing the service and the scope of services to be provided. The rate for services will be determined and agreed upon in an agreement prior to the start of work for the client. Clients will be provided with an invoice for these services.

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

LFA does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). All fees are calculated as described above and are not charged on the basis of income or capital gains or capital appreciation of the funds or any portion of the funds of an advisory client.

### **Item 7 – Types of Clients**

LFA manages investment portfolios for individuals, qualified retirement plans, trusts, and small businesses.

### **Minimum Account Sizes**

Although LFA does not have a minimum account size, it may impose a minimum annual fee of \$5,000 for services provided, as discussed earlier in Item 5 - Fees and Compensation.

Please refer to Item 5 of this Brochure for complete fee billing details.

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

#### **Methods of Analysis and Investment Strategy**

LFA's services are based on long-term investment strategies incorporating the principles of Modern Portfolio Theory. LFA's investment approach is firmly rooted in the belief that markets are "efficient" over periods of time and that investors' long-term returns are determined principally by asset allocation decisions, rather than market timing or stock picking. LFA recommends diversified portfolios, principally through the use of passively managed, asset class mutual funds. LFA selects or recommends portfolios of securities, principally broadly-traded open end mutual funds or conservative fixed income securities to implement this investment strategy.

LFA also utilizes historical database software from Morningstar and Dimensional Fund Advisors as well as reported information directly from the fund provider or carrier and/or their web-site.

Although all investments involve risk, LFA's investment advice seeks to limit risk through broad diversification among asset classes and, as appropriate for particular clients the investment directly in conservative fixed income securities to represent the fixed income class. LFA's

investment philosophy is designed for investors who desire a buy and hold strategy. Frequent trading of securities increases brokerage and other transaction costs that LFA's strategy seeks to minimize.

In the implementation of investment plans, LFA therefore primarily uses mutual funds and, as appropriate, portfolios of conservative fixed income securities. LFA may also utilize Exchange Traded Funds (ETFs) to represent a market sector.

Clients may hold or retain other types of assets as well, and LFA may offer advice regarding those various assets as part of its services. Advice regarding such assets will generally not involve asset management services but may help to more generally assist the client.

LFA's strategies do not utilize securities that we believe would be classified as having any unusual risks, and we do not recommend frequent trading, which can increase brokerage and other costs and taxes.

LFA does not typically recommend the purchase of securities on margin. However, if a client account has a short-term cash need, LFA may suggest the use of margin to raise the funds necessary in lieu of selling securities held in an account. LFA may also recommend the use of long-term investment techniques such as dollar-cost averaging.

LFA receives supporting research from BSP and from other consultants, including economists affiliated with Dimensional Fund Advisors ("DFA"). LFA utilizes DFA mutual funds in client portfolios. DFA mutual funds follow a passive asset class investment philosophy with low holdings turnover. DFA provides historical market analysis, risk/return analysis, and continuing education to LFA.

### **Analysis of a Client's Financial Situation**

In the development of investment plans for clients, including the recommendation of an appropriate asset allocation, LFA relies on an analysis of the client's financial objectives, current and estimated future resources, and tolerance for risk. To derive a recommended asset allocation, LFA may use a Monte Carlo simulation, a standard statistical approach for dealing with uncertainty. As with any other methods used to make projections into the future, there are several risks associated with this method, which may result in the client not being able to achieve their financial goals. They include:

- The risk that expected future cash flows will not match those used in the analysis
- The risk that future rates of return will fall short of the estimates used in the simulation
- The risk that inflation will exceed the estimates used in the simulation
- For taxable clients, the risk that tax rates will be higher than was assumed in the analysis

### **Risk of Loss**

**Investing in securities involves risk of loss that clients should be prepared to bear.**

All investments present the risk of loss of principal – the risk that the value of securities (mutual funds, ETFs and individual bonds), when sold or otherwise disposed of, may be less than the price paid for the securities. Even when the value of the securities when sold is greater than the price paid, there is the risk that the appreciation will be less than inflation. In other words, the purchasing power of the proceeds may be less than the purchasing power of the original investment.

The mutual funds and ETFs utilized by LFA may include funds invested in domestic and international equities, including real estate investment trusts (REITs), corporate and government fixed income securities and commodities. Equity securities may include large capitalization, medium capitalization and small capitalization stocks. Mutual funds and ETF shares invested in fixed income securities are subject to the same interest rate, inflation and credit risks associated with the underlying bond holdings.

Among the riskiest mutual funds used in LFA's investment strategies funds are the U.S. and International small capitalization and small capitalization value funds, emerging markets funds, and commodity futures funds. Conservative fixed income securities have lower risk of loss of principal, but most bonds (with the exception of Treasury Inflation Protected Securities or TIPS) present the risk of loss of purchasing power through lower expected return. This risk is greatest for longer-term bonds.

Certain funds utilized by LFA may contain international securities. Investing outside the United States involves additional risks, such as currency fluctuations, periods of illiquidity and price volatility. These risks may be greater with investments in developing countries.

### **Interval Fund Risk**

An interval fund is a type of closed-end fund containing shares that do not trade on the secondary market. Instead, the fund periodically offers to buy back a percentage of outstanding shares at net asset value.

The rules for interval funds, along with the types of assets held, make this investment largely illiquid compared with other funds. The primary reasons for investors to consider investing in interval funds LFA may utilize include, but are not limited to, gaining exposure to certain risk categories that provide diversified sources of expected returns, part of which may be in the form of illiquidity premiums. Access to the intended risk and expected return characteristics may not otherwise be available in more liquid, traditional investment vehicles.

Where appropriate, LFA may utilize certain interval funds structured as non-diversified, closed-end management investment companies, registered under the Investment Company Act of 1940. Investments in an interval fund involve additional risk, including lack of liquidity and restrictions on withdrawals. During any time periods outside of the specified repurchase offer window(s), investors will be unable to sell their shares of the interval fund. There is no assurance

that an investor will be able to tender shares when or in the amount desired, and the fund may suspend or postpone purchases. Clients should carefully review the fund's prospectus to more fully understand the interval fund structure and the corresponding liquidity risks. Because these types of investments involve certain additional risk, these funds will only be utilized when consistent with a client's investment objectives, individual situation, suitability, tolerance for risk and liquidity needs. Investment should be avoided where an investor has a short-term investing horizon and/or cannot bear the loss of some or all of the investment.

More information about the risks of any particular market sector can be reviewed in representative mutual fund prospectuses managing assets within each applicable sector.

### **Cybersecurity Risk**

The computer systems, networks and devices used by LFA and service providers to us and our clients to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches. Despite the various protections utilized, systems, networks or devices potentially can be breached. A client could be negatively impacted as a result of a cybersecurity breach.

Cybersecurity breaches can include unauthorized access to systems, networks, or devices; infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow or otherwise disrupt operations, business processes or website access or functionality. Cybersecurity breaches may cause disruptions and impact business operations, potentially resulting in financial losses to a client; impediments to trading; the inability by us and other service providers to transact business; violations of applicable privacy and other laws; regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs, as well as the inadvertent release of confidential information.

Similar adverse consequences could result from cybersecurity breaches affecting issuers of securities in which a client invests; governmental and other regulatory authorities; exchange and other financial market operators, banks, brokers, dealers and other financial institutions and other parties. In addition, substantial costs may be incurred by these entities in order to prevent any cybersecurity breaches in the future.

### **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of LFA or the integrity of LFA's management. LFA has no information applicable to this Item.

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

### **Affiliated Accounting Firms**

Some Members of LFA are also Officers, consultants and employees of the accounting firm Lauterbach, Borschow & Company, P.C. ("LB&C"). LB&C compensates LFA for any accounting services performed by consultants, who are employees of LFA.

Certain Members of Lauterbach, Borschow & Company, P.C. recommend LFA to accounting clients in need of advisory services. Under the terms of the internal referral agreement, these Members shall receive referral compensation should the client retain LFA for advisory services.

Certain Members or Employees of LFA recommend LB&C to advisory clients in need of accounting services and shall be compensated for this referral. Accounting services provided by LB&C are separate and distinct from the advisory services of LFA, and are provided for separate and typical compensation. The referral of clients between LFA and LB&C presents a conflict of interest, however, no LFA client is obligated to use LB&C for any accounting services, nor is an LB&C client obligated to retain LFA for advisory services. LB&C accounting services do not include the authority to sign checks or otherwise disburse funds on any LFA advisory client's behalf.

Certain Members will spend a substantial majority of their business time on their accounting practice. Business time will vary among the Members based on their direct involvement in the LFA advisory activities.

### **Buckingham Strategic Partners, LLC**

As described above in Item 4, LFA may exercise discretionary authority provided by a client to select an independent third-party investment manager for the management of portfolios of individual fixed income securities. LFA selects Buckingham Strategic Partners, LLC ("BSP") for such fixed income management. LFA also contracts with BSP for back office services and assistance with portfolio modeling. LFA has a fiduciary duty to select qualified and appropriate managers in the client's best interest, and believes that BSP effectively provides both the back-office services that assist with its overall investment advisory practice and fixed income portfolio management services. The management of LFA continuously makes this assessment. While LFA has a contract with BSP governing a time period for back office services, LFA has no such fixed commitment to the selection of BSP for fixed income management services and may select another investment manager for clients upon reasonable notice to BSP.

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

LFA has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. LFA's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients and sets forth LFA's practice of supervising the personal securities transactions of employees with access to

client information. Individuals associated with LFA may buy or sell securities for their personal accounts identical or different than those recommended to clients. It is the expressed policy of LFA that no person employed by the firm shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on investment decisions of advisory clients.

To supervise compliance with its Code of Ethics, LFA requires that anyone associated with this advisory practice with access to advisory recommendations provide annual securities holding reports and quarterly transaction reports to the firm's principal. LFA also requires such access persons to receive approval from the Chief Compliance Officer prior to investing in any IPO's or private placements (limited offerings).

LFA's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information and protecting the confidentiality of client information. LFA requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to discipline.

LFA will provide a complete copy of its Code of Ethics to any client or prospective client upon request.

Principal transactions are generally defined as transactions where an advisor, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated private fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment advisor in relation to a transaction in which the investment advisor, or any person controlled by or under common control with the investment advisor, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an advisor is dually registered as a broker-dealer or has an affiliated broker-dealer. It is LFA's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. For clients that retain BSP for sub-advisory fixed income management, please note that BSP may engage in cross transactions of fixed income securities pursuant to their ADV disclosure. Clients should refer to BSP's Form ADV Part 2 for full disclosure of BSP's trading practices, including their determination of when fixed income cross trades may be advantageous for clients. LFA will not cross trades between client accounts. LFA continually monitors all trading in client accounts, including fixed income transactions performed by the sub-advisor.

## **Item 12 – Brokerage Practices**

### **Investment Management Services:**

LFA arranges for the execution of all securities transactions with the assistance of BSP. Through BSP, LFA participates in the Schwab Institutional (SI) services program offered to independent

investment advisers by Charles Schwab & Company, Inc., TD Ameritrade Institutional ("TDA") services program offered to independent investment advisers by TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade") and the Fidelity Institutional Wealth Services (FIWS) program, sponsored by Fidelity Brokerage Services, LLC ("Fidelity"). Schwab, TDA and Fidelity are FINRA broker dealers and members of SIPC.

The Schwab, TDA and Fidelity brokerage programs will generally be recommended to advisory clients for the execution of mutual fund and equity securities transactions. LFA regularly reviews these programs to ensure that its recommendations are consistent with its fiduciary duty. These trading platforms are essential to LFA's service arrangements and capabilities, and LFA may not accept clients who direct the use of other brokers. As part of these programs, LFA receives benefits that it would not receive if it did not offer investment advice (See the disclosure under Item 14 of this Brochure).

As LFA will not request the discretionary authority to determine the broker dealer to be used or the commission rates to be paid in these situations, clients must direct LFA as to the broker dealer to be used. In directing the use of a particular broker or dealer, it should be understood that LFA will not have authority to negotiate commissions among various brokers or obtain volume discounts, and best execution may not be achieved. Not all investment advisers require clients to direct the use of specific brokers.

LFA will not exercise authority to arrange client transactions in fixed income securities. Clients may provide this authority to a fixed income manager retained by LFA on client's behalf by designating the portfolio manager with trading authority over client's brokerage account. Clients will be provided with the Disclosure Brochure (Form ADV Part 2) of the portfolio manager.

SI, TDA and FIWS do not generally charge clients a custody fee and are compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through the broker or that settle into the clients' accounts at the brokers. Trading client accounts through other brokers may result in fees (including mark-ups and mark-downs) being charged by the custodial broker and an additional broker. While LFA will not arrange transactions through other brokers, the authority of the fixed income portfolio manager includes the ability to trade client fixed income assets through other brokers.

LFA also does not have any arrangements to compensate any broker dealer for client referrals.

When trading client accounts, errors may periodically occur. LFA does not maintain any client trade error gains. LFA makes client whole with respect to any trade error losses incurred by client and caused by LFA. For clients utilizing TDA for brokerage services, TDA maintains a policy that any trade error gains will be donated by TDA to charity.

LFA does not aggregate any client transactions in mutual fund or other securities. Client accounts are individually reviewed and managed, and transaction costs are not saved by aggregating orders in almost all circumstances in which LFA arranges transactions. BSP, in the

management of fixed income portfolios, will aggregate certain transactions among client accounts that it manages, in which case a LFA client's orders may be aggregated with an order for another client of BSP who is not an LFA client. *See BSP's Form ADV Part 2 for further information on their practices related to aggregation of fixed income trades.*

### **Employee Benefit Retirement Plan Services:**

Generally, LFA does not typically arrange for the execution of securities transactions for plans as a part of this service. Transactions are executed directly through employee plan participation.

### **Broker Selection:**

LFA, due to the nature of its business and client needs, does not include blocking trades, negotiating commissions with broker dealers or obtaining volume discounts, nor necessarily obtaining the best price. Clients will be required to select their own broker dealers and insurance companies for implementation of any recommendations. LFA may recommend any one of several brokers. LFA clients must independently evaluate these brokers before opening an account. The factors considered by LFA when making this recommendation are the broker's ability to provide professional services, LFA's experience with the broker, the broker's reputation, and the broker's financial strength, among other factors. LFA's clients may use any broker or dealer of their choice.

## **Item 13 – Review of Accounts**

### **Reviews:**

#### **Investment Management Services**

Account assets are supervised continuously by the client's respective advisor and reviewed periodically by LFA's President and LFA's compliance team. Any employee or member of LFA may also raise any concerns regarding assets, allocations, or related issues to management or a compliance team member. The review process contains each of the following elements:

- a. assessing client goals and objectives;
- b. evaluating the employed strategy(ies);
- c. monitoring the portfolio(s);
- d. addressing the need to rebalance;
- e. addressing tax considerations.

Additional account reviews may be triggered by any of the following events:

- a. a specific client request;
- b. a change in client goals and objectives;
- c. an imbalance in a portfolio asset allocation; and



d. market/economic conditions.

For fixed income portfolios, certain account review responsibilities are delegated to a third-party investment manager as described above in Item 4.

### **Employee Benefit Retirement Plan Services:**

Plan assets are reviewed on a quarterly basis, and according to the standards and situations described above for investment management accounts.

### **Reports:**

All clients, other than those utilizing Employee Benefit Retirement Plan Services, will receive quarterly performance reports, prepared by BSP and reviewed by LFA, that summarize the client's account and asset allocation. Clients will also receive at least quarterly statements from their account custodian which will outline the client's current positions, and current market value.

### **Employee Benefit Retirement Plan Services**

Plan sponsors are provided with quarterly information and annual performance reviews from LFA. In addition, plan participant education information may also be provided to the Plan Sponsor or Administrator for distribution to the participants of the plan.

## **Item 14 – Client Referrals and Other Compensation**

### **Other Compensation:**

As indicated under the disclosure for Item 12, SI, TDA and FIWS each respectively provide LFA with access to services, which are not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis at no charge to them.

These services benefit LFA but may not benefit its clients' accounts. Many of the products and services assist LFA in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of LFA's fees from its clients' accounts, and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of LFA's accounts. Recommended brokers also make available to LFA other services intended to help LFA manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. LFA does not, however, enter into any commitments with the brokers for transaction levels in exchange

for any services or products from brokers. While as a fiduciary, LFA endeavors to act in its clients' best interests, LFA's requirement that clients maintain their assets in accounts at Schwab, TDA or FIWS may be based in part on the benefit to LFA of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the brokers, which may create a potential conflict of interest.

On limited occasions, fund companies LFA recommends may pay for routine and typical travel expenses, including hotel and transportation, for LFA professionals to attend conferences sponsored by those same fund companies. This is an economic benefit for LFA to have these costs covered, however LFA has not made any commitment to direct business to any of these companies.

### **Client Referrals:**

LFA will from time to time compensate, either directly or indirectly, any person (defined as a natural person or a company), including members of Lauterbach, Borschow & Company, P.C., for client referrals. In addition, representatives of LFA may be compensated via a referral fee agreement when clients of LFA are recommended and retained by its affiliate, Lauterbach, Borschow & Company, P.C. for accounting services. LFA clients are under no obligation to retain Lauterbach, Borschow & Company, P.C. for accounting services. LFA is aware of the special considerations promulgated under Section 206(4)-3 of the Investment Advisers Act of 1940 and similar state regulations. Should LFA elect to compensate such persons, appropriate disclosure shall be made, all written instruments will be maintained by LFA and all applicable Federal and/or State laws will be observed.

### **Item 15 – Custody**

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. LFA urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

### **Item 16 – Investment Discretion**

LFA requests that it be provided with written authority to determine which securities and the amounts of securities that are bought or sold. Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change/amend these limitations as required. Any limitations on this discretionary authority shall be provided in writing.

When selecting securities and determining amounts, LFA observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to LFA in writing.

LFA may manage some accounts on a nondiscretionary basis.

For fixed income securities, this authority will include the discretion to retain a third party money manager for fixed income accounts exceeding \$400,000.

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

Proxy Voting: As a matter of firm policy and practice, LFA does not accept the authority to and does not vote proxies on behalf of advisory client. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Clients will receive applicable proxies directly from the issuer of securities held in clients' investment portfolios. LFA, however, may provide advice to clients regarding the clients' voting of proxies.

Class Actions, Bankruptcies and Other Legal Proceedings: Clients should note that LFA will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held or previously were held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct LFA to transmit copies of class action notices to the client or a third party. Upon such direction, LFA will make commercially reasonable efforts to forward such notices in a timely manner.

## **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about LFA's financial condition. LFA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.