

Item 1: Cover Page



Shuttleworth
& Company
Investment Advisors

Form ADV Part 2A-Disclosure Brochure

Effective: March 22, 2021

Shuttleworth & Company

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614-760-7738

www.sco-advisors.com

This Brochure provides information about the qualifications and business practices of Shuttleworth & Company (CRD#: 121382) and David L. Shuttleworth. Please contact David L. Shuttleworth if you have any questions about the contents of this brochure at 614-760-7738 or by email at dave@sco-advisors.com.

Shuttleworth & Company is a registered Investment Advisor. The information in this brochure has not been approved or verified by the SEC or by any other States' Securities Regulating Bodies. Registration of an Investment Advisor does not imply any specific level of skill or training.

Additional information about Shuttleworth & Company and its advisory persons are available on the SEC's website at www.advisorinfo.sec.gov by searching for our firm name or by our CRD #121382.

Item 2: Material Changes

The purpose of this page is to inform you interested parties of any material changes since the previous version of this brochure. As of March 2021, Shuttleworth & Company (SCO) is in the process of transitioning registration from the State of Ohio to the U.S. Securities and Exchange Commission. This change of registration is required based upon the assets under management of SCO as of the end of December 2020.

There have been no other material changes since our brochure was last updated on February 20, 2020. We will provide ongoing disclosure information about material changes, as necessary.

Our disclosure brochure may be requested by contacting us at 614-760-7738 or info@scoadvisors.com. Our brochure is also available on our website at www.sco-advisors.com.

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Item 4: Advisory Business

Firm Information and Advisory Service

The business activities of Mr. Shuttleworth and Shuttleworth & Company (hereafter “SCO”) consist of providing investment advisory services. David L. Shuttleworth is the sole owner, maintaining a 100% ownership stake since founding SCO in March 1999. SCO renders continuous management of accounts and provides advice to clients as to investment of funds based upon an individual client’s needs and suitability. SCO utilizes a balanced long-term investment strategy. Therefore, suitable clients include individuals (including trusts and estates), pension funds, charitable organizations, and other entities with established funds that have long time horizons. Established goals and objectives serve as guidelines that portfolio managers of Shuttleworth & Company use for investment management decisions. Advisory services are performed in general on a discretionary basis. No client account participates in a wrap-fee program. SCO has under its management the following assets as of December 31, 2020:

Discretionary:	\$109,985,857
Non-discretionary	\$38,592

SCO will generally require that anyone whose functions or duties relate to providing investment advice possess a CPA, PFS or CFA designation, Series licensing, and/or experience judged by SCO’s management to be comparable to the above.

Item 5: Fees and Compensation

Fee Schedule

Annual fees for discretionary investment advice are calculated using a tiered billing system, based upon the market value of the account. Clients are offered the choice of being billed or consenting to a direct fee withdrawal from their account. The fee is the sum of the results from applying the following annual rates:

	Lower Range	Upper Range	Rate
Assets Under Management	0	1,000,000	1.00%
Assets Under Management	1,000,001	4,000,000	0.75%
Assets Under Management	4,000,001	10,000,000	0.65%
Assets Under Management	10,000,001	And above	Negotiable

The annual minimum fee is \$1,000. This is generally charged regardless of account size but is subject to the discretion of the management of SCO for each account and may be negotiated.

Fees are payable quarterly in arrears based upon the beginning market value of the account at each billing period. The fee structure may differ based upon factors such as account size, cash flow,

related accounts, investment limitations, and other special requests. Additionally, SCO reserves the right to customize fees concurrent with specific and unique advice if the client and advisor believe it is the best interest of both parties.

In certain circumstances mutual fund investments are used. Clients invested in mutual funds pay an additional investment management fee to the mutual fund advisor.

Each investment advisory contract may be terminated by either party prior to its stated expiration date, if any, upon 30 days written notice to the other. Any earned portion of SCO's fees not previously billed will be billed to the client on a prorated basis upon such early termination.

No compensation arrangements are permissible with outside parties for the management or employees of SCO.

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

SCO does not offer performance-based fee arrangements (fees based on a share of capital gains or on the substantial appreciation of client's assets). Performance-based fees can potentially create a conflict of interest. Since this arrangement can induce an advisor to take inappropriate risk in its portfolio management to maximize returns (and its related fees) thereby potentially putting the client's investments at higher risk.

Item 7: Types of Clients

SCO offers investment advisory services to individuals, high net worth individuals, pension plans and non-profit companies domiciled in the United States. SCO is currently registered in the States of Ohio and Texas. The percentage of each type of client can be found on the Form ADV Part 1A, Section 5 at <https://adviserinfo.sec.gov/firm/summary/121382>. These percentages are subject to change and are updated at least annually by the Advisor.

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

SCO manages substantially all its accounts on a discretionary basis, and therefore makes the following investment decisions:

1. Which securities are bought and sold;
2. The size and amount of each order/transaction;
3. For accounts not directed or in custody at a specific brokerage firm (i.e. bank trust department), the broker to be used for specific transactions; and,
4. The most favorable commission schedule with each broker per type of transaction.

The above investment and brokerage discretion are considered a normal part of the investment management responsibility for which SCO has been hired. As such, there are minimal limitations,

but a high degree of accountability and responsibility to each client. In cases where SCO's clients select a specific broker or brokerage firm, the client may limit SCO's ability to negotiate commissions for optimal prices and/or execution for the benefit of the client.

Potential securities for investment include equities (common and preferred stocks), fixed income securities (including corporate, municipal and U.S. government and agency bonds), mutual funds, exchange traded funds (ETFs), annuities, and partnerships (including oil & gas pipeline and real estate).

SCO is interested in the best suitability and fit for a client's portfolio. Therefore, it focuses primarily on using a diversified strategy. Most securities are held as long-term investments while also evaluating short-term and trading opportunities. Investment in any securities or investment strategy does carry inherent risks that clients acknowledge their understanding, and such affirmation is included in written agreements with SCO. Research and securities analysis incorporate both fundamental and technical analysis with charting technology. Research is conducted through public sources, and SCO receives no compensated research or allows soft-dollar arrangements.

The management of SCO or its employees may from time to time recommend to non-discretionary accounts, or implement for discretionary accounts, the purchases or sales of securities that are owned, or contemplated being owned, subject to the following controls:

1. All clients are notified upon engaging the services of SCO that the above may occur;
2. Should a recommendation occur, all shares of the securities including the shares for the management of SCO and its employees will be traded together in a "block" to obtain the same advantage and average acquisition price for all accounts; and,
3. If it is determined by SCO that the above combination of accounts for a trade is inappropriate, the trades of SCO and its employees will take place after the completion of the trades for clients' accounts. These controls are designed to eliminate conflicts of interest and is consistent with SCO's ethical and fiduciary duties to prevent any personal gains from action taken for its clients.

Non-Discretionary Accounts

A small very percentage of time is consumed by the employees of SCO giving advice on a non-discretionary account management basis. In these instances, either verbal and/or written recommendations are provided to the client for his/her ultimate concurrence or refusal.

Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that could be relevant to your proper evaluation of each supervised person

providing investment advice. No information is applicable to this item for any current member of SCO. To date no disciplinary actions, past or ongoing, are applicable to SCO or any current or former employee of SCO.

Item 10: Other Financial Industry Activities and Affiliations

SCO nor any of its staff are registered or seeking registration as a broker dealer or a registered representative of a broker dealer, futures commission merchant, commodity pool operator, commodity trading advisor, or a person of the foregoing entities. SCO doesn't recommend or select other investment advisors for our clients.

Item 11: Code of Ethics, Participation in Client Transactions, Personal Trading and Qualified Account Rollovers

- Code of Ethics

SCO has adopted a Code of Ethics, a copy of which is available upon request. This Code of Ethics is based upon the principle that all employees of SCO have a fiduciary duty to place the interest of clients ahead of theirs and SCO's, and to comply with federal and state securities laws.

- Participation or Interest in Client Transactions

Personnel of SCO may participate independently or within a block transaction of client-eligible securities. It is the policy of SCO that all allocations of joint participation be first and foremost evenly allocated. The Code of Ethics prohibits members of SCO or family members to influence a market or security transaction in conjunction with a client transaction.

- Personal Trading

All personal trading is documented, and records are kept for five years for inspection. All trading that occurs complies with SCO's personal trading policy (See Participation or Interest in Client Transactions). For further inquiry, all clients are encouraged to address questions to David L. Shuttleworth.

- Qualified Employer Provided Benefit Plan Account Rollovers

Clients and prospective clients may seek our advice upon leaving employment for rolling their existing employer provided defined contribution plan (i.e. 401(k), 403(b) or similar) account balance into an Individual Retirement Account (IRA). We advise all clients that they typically have four choices for these types of assets:

- 1) Leave the funds in the current plan;
- 2) Roll it over (a direct transfer) into a new employer's plan;
- 3) Roll it over into an IRA; and,

- 4) Take out the funds in cash (but likely face significant federal and state income taxes, and potentially penalties).

Rolling Qualified Plan assets into an IRA account that SCO would manage increases the assets that SCO manages and its corresponding management fee income. We encourage the rollover of such assets only after performing thoughtful analysis of the options available under each client's unique set of circumstances.

Item 12: Brokerage Practices

We seek to recommend a custodian/broker that will hold client's assets and execute transactions on terms that are, overall most advantageous when compared with other available providers and their services. We consider a wide range factors in selecting brokers that begins with our understanding of the brokerage industry. We then weigh the following factors for all brokers being considered: the skill and quality of optimum execution of trades, the breadth of available investment products such as stocks, bonds, mutual funds, exchange-traded funds (ETF's), etc. and readily availability of competitively priced fixed-income, ETFs and mutual funds, the service and reporting of the brokerage transactions (recording and confirmation), the overall research information made available, the commitment to provide us with a high level of service for back-office operations, state-of-the-art trading platform and website for clients' viewing of account information, and industry competitive trading commissions and transaction fees, and the reputation, financial strength, security, and stability of the broker/custodian.

SCO may pay a broker or brokerage commission a greater amount than another broker might charge for executing the same transaction, with recognition of the value of the brokerage or free research services provided by the executing broker. Research services are used to service all clients. Some of the services received because of SCO's transactions on behalf of a client may primarily benefit other clients, and services received because of SCO's transactions on behalf of other clients may primarily benefit the first client.

The brokerage firm used may earn a commission by executing the purchase or sale of an over-the-counter (OTC) security through a related company that may also earn a fee as a market maker.

SCO recommends that clients establish brokerage accounts with Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although SCO may recommend that clients establish their accounts at Schwab, it is the client's decision to custody assets with Schwab by entering into an account agreement with Schwab. SCO does not open the account(s) for the client but will assist the client in the account opening procedure. SCO is independently owned and operated and not affiliated with Schwab.

Schwab provides SCO with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to

independent investment advisors on an unsolicited basis. Schwab's brokerage services include the execution of securities transactions, custody, research, and access to institutional only mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment for a retail investor.

Schwab does not charge separately for custody services for SCO clients maintained in its custody but may be compensated by account holders through trading commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts. Schwab also earns management fees on money market and Mutual Funds that are owned and operated by Schwab that SCO may choose as investments for client accounts. SCO doesn't receive any incentives or referrals from Schwab.

Schwab also provides other services intended to help SCO manage and further develop its business, and the retention and servicing of its clients. These services include annual educational conferences and events, consulting on technology, compliance, legal, and business needs, publications and conferences on practice management and business succession, marketing consulting and support. Schwab may provide these services or arrange for third-party vendors to provide these services. Schwab may provide a discount or waive its fees for some of these services.

SCO attends the *Solutions* workshop locally offered by Schwab each year in Columbus, Ohio and other large metropolitan cities. The workshop covers updates on Schwab's technology and services and how they apply to the daily operation of SCO's business. There is no direct cost to SCO since the workshop is local. Schwab also hosts an annual *IMPACT* conference, which is the premier industry conference for registered investment advisors. It features a dynamic lineup of keynote speakers, education sessions covering a wide range of topics from investment strategies to market trends, and an opportunity to gain more in-depth knowledge about Schwab's products and services. Schwab provided half of the registration fee for management of SCO to attend in two different past conferences. SCO is responsible for the cost of transportation and lodging for the conference.

a) Soft Dollar Practices

Soft dollar arrangements on behalf of clients are not engaged in by SCO for any reason.

b) Client Referrals

SCO does not have paid arrangements such as referrals, commissions, or discounted investment management services with any outside entity or person (i.e. broker, colleague, etc.) in connection with obtaining a new client for SCO.

c) Directed Brokerage

It is a policy of SCO to seek to execute portfolio transactions at prices which are advantageous to the clients, and at commission rates which are reasonable in relation to the benefits derived by its

clients. Any client directing broker execution is advised of SCO's policy and the potential cost of the transaction(s).

d) Trade Aggregation

SCO will, as a common brokerage trading practice, aggregate multiple contemporaneous client orders into blocks ("block trades") when it is judged to be practical by the advisor. Participating accounts typically receive an average price of any partial or whole execution of such blocks. While this procedure in most cases creates a lower average price per trade for each client, its application cannot be guaranteed.

e) Cross Trades

A cross trade occurs when SCO affects a transaction between two advisory clients (e.g., having Account A purchase securities directly from Account B). Such trades are most often done when a client asset needs liquidated for a distribution request and another client needs the asset to rebalance the account to meet the component of the asset allocation model. In a cross-trade transaction, in contrast to an agency cross transaction, SCO receives no compensation other than its advisory fee.

SCO shall not affect a cross trade for advisory clients unless:

- 1) It has determined that no client will be disfavored by cross-trading;
- 2) The trade is executed at a price determined by an independent pricing mechanism and such pricing mechanism is documented as to each cross trade; and
- 3) In the case of cross trades involving one or more client whose account contains employee benefit plan assets, no cross trades shall be executed without the pre-approval (in each instance) of the CCO. The CCO shall not approve such cross trade until he or she has determined that the cross trade is not a "prohibited transaction" under Section 406(b) of ERISA or an exemption is obtained from the Department of Labor.

Item 13: Review of Accounts

All client accounts are reviewed at a minimum on a quarterly basis, and clients are invited to participate on the same basis. In addition, any material changes to a client's Investment Policy Letter, portfolio objectives, risk tolerance, securities eligibility or general decisions such as withdrawals may be amended at any time by the client. Client reviews are conducted by Portfolio Managers of SCO. A review consists of an Investment Report that includes a summary of the activity of the account(s), summary asset categorization by classification, and a three-month, year-to-date and trailing twelve-month performance report based upon total return. These meetings are ongoing and are meant to provide the client with frequent opportunity to discuss future objectives and answer current questions regarding their account(s).

Item 14: Client Referrals and Other Compensation

SCO does not have any arrangements with any other individual or entity for client referrals. SCO does not pay anyone for client referrals, and we do not receive any compensation from referring a client to an unaffiliated person or entity for another type of service or product for which we do not offer. Occasionally an existing client may refer a family member or friend to SCO, the referring client does not receive any special benefit or discounted fees for the referral of someone to the firm.

Item 15: Custody

SCO does not maintain custody of clients' assets for which we manage. All accounts are held with a qualified custodian. Clients receive monthly an independent account statement of assets and transactions for every account from their custodian either electronically or printed as selected by them. SCO issues separate quarterly investment reports for all the accounts that they manage. Clients are urged to carefully review both monthly account statements and quarterly investment reports and compare them.

SCO assists many of its clients with the routine transfer of funds either electronically or by journal entry between qualified custodial accounts that it manages or with client's accounts maintained at other qualified custodians, based upon standing letters of authority that meet established guidelines so as not to constitute having custody of these client funds.

By its Regulator, SCO is deemed to have custody over the accounts of clients that have granted SCO the authority to deduct its fees and/or expenses directly from their account(s). However, if specified required rules for such deductions are followed by SCO and it is in compliance with such rules, these deductions do not invoke Custody Rule requirements.

Item 16: Investment Discretion

Almost all of SCO's client accounts are managed on a discretionary basis and are held in custody at a qualified custodian (See *Portfolio Management, Analysis and Investment Strategy*). All clients must independently authorize investment management authority in favor of SCO with their custodian for each specific account to be managed. In addition, all clients must execute an Investment Management Agreement (for specifying the funds that SCO is engaged to manage and to describe the management relationship in detail), and an Investment Policy Letter (stating the client's risk preference and investment objectives) prior to SCO's active involvement with a client's account.

Item 17: Voting Client Securities

SCO retains a policy of deferring all securities voting to clients. No proxy voting arrangements exist in favor of SCO management or its employees. SCO will assist in answering questions relating to proxies and provide aid to clients in the appropriate method to vote, i.e. voting online at proxy website or by mail. The client retains the sole responsibility for proxy decisions and voting.

Item 18: Financial Information

SCO does not engage in prepayment of services and all billing is processed in arrears. Furthermore, SCO is a solvent, on-going concern with no items of disclosure regarding financial situations that may jeopardize custodian-held client funds in any way. Therefore, the submission of a current annual balance sheet is not applicable under securities law requirements.

Item 19: Requirements for State Registered Advisors

Additional requirements for state registered advisors are addressed by SCO in ADV Part 2B: (Brochure Supplement).

Annual Updating of Form ADV Part 2A and Part 2B

SCO is required to update Form ADV Part 2A (Brochure) at least annually and file all updates on the online filing system for Investment Advisors known as the Investment Advisory Registration Depository (IARD) within 90 days of fiscal year end. SCO is also required to update the Brochure if it becomes materially inaccurate and file those changes on the IARD within 30 days of the material change.

Part 2A and Part 2B is provided to all new clients at the time of engagement and is offered to all existing clients annually by mail. Each new client signs the SCO Investment Advisory Contract confirming receipt of Form ADV Part 2A and 2B.

Appendix A:

Wrap-Fee Program

SCO does not participate in a wrap-fee program to date and is unrelated to person(s) who do participate in a wrap-fee program.

Part ADV Part 2B: Brochure Supplement

Shuttleworth & Company

David L. Shuttleworth

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March 22, 2021

This brochure supplement provides information about David L. Shuttleworth (CRD#: 4574636) that supplements the Shuttleworth & Company brochure. Please contact David L. Shuttleworth at 614-760-7738 or by email at dave@sco-advisors.com if you have questions about the contents of this supplement.

Additional information about David L. Shuttleworth is available on the SEC's website at www.advisorinfo.sec.

Portfolio Manager Educational Background and Business Experience

Item 2: Educational Background and Business Experience

David L. Shuttleworth, born in 1954, received a BS in Business Administration from The Ohio State University (1984), and maintained a career as an accountant (public and private) from 1976 through 1996. He obtained his CPA license in February 1985. His license is currently non-active (Ohio). He worked as a Portfolio Manager from 1997 through March 1999 at a local investment advisory firm and thereafter founded Shuttleworth & Company (SCO). David retained his Series 65 license in March 1999. From the inception of SCO to the present he has been its sole owner and senior management holding both the positions of President and Senior Portfolio Manager.

Item 3: Disciplinary Information

No information is applicable to this Item for any current member of SCO or its Management. To date no disciplinary actions, past or ongoing, are applicable to this Company or any employee of SCO.

Item 4: Other Business Activities and Affiliations

SCO and its employees do not offer any auxiliary advisory, brokerage or management services, nor are there any other business activities of SCO or its employees.

Item 5: Additional Compensation

The Management of SCO does not participate or condone additional compensation arrangements that extend, but are not limited to, the following: client referrals, sales compensation for non-client contacts, and soft-dollar arrangements.

Item 6: Supervision and Succession

As a small investment advisory firm, the Senior Portfolio Manager is by necessity also designated as the Chief Compliance Officer. All accounts are held at a custodian for safe-keeping and oversight, where independent records of all transactions are provided monthly to all clients by the custodian.

There is a succession agreement that provides for the continuation of investment management services in the event of permanent disability or death of David Shuttleworth (Owner) of SCO. This agreement serves SCO and its clients by providing ongoing investment advisory services should such an event take place. SCO has an agreement with Matthew Freiburger, Portfolio Manager of SCO, to purchase the stock of the Owner should he become permanently disabled or die. Clients of SCO would continue to receive investment management services, as per their existing agreements, all clients would be required to execute a new investment management agreement within 45-60 days of the change of SCO's controlling ownership to continue the investment management relationship between the parties.

Item 7: Requirements for State-Registered Advisors

There are no additional disciplinary actions to disclosure on behalf of David L. Shuttleworth.

Part ADV Part 2B: Brochure Supplement

Shuttleworth & Company

Erin M. Maynard ChFC, CLU

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March 22, 2021

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This brochure supplement provides information about Erin M. Maynard (CRD#: 3124545) that supplements the Shuttleworth & Company brochure. Please contact David L. Shuttleworth at 614-760-7738 or by email at dave@sco-advisors.com if you have questions about the contents of this supplement.

Additional information about Erin M. Maynard is available on the SEC's website at www.advisorinfo.sec.

Investment Advisor Representative Educational Background and Business Experience

Item 2: Educational Background and Business Experience

Erin M. Maynard, born in 1973 received a BS in Financial Management from The Ohio State University (1996), and has maintained a career in the financial services industry from 1994 through present. She worked as a financial advisor with Western Credit Union from 1994-1998 while attending college. In a desire to pursue a career in financial planning and investment management, Erin worked at Banc One Securities from 1998-1999 where she became licensed in securities and worked as a sales representative. She worked as a Retirement Planning Specialist from 1999-2007 with Nationwide Retirement Services while attaining the Series 65 Investment Adviser Representative (IAR) license where her focus was on retirement planning for individuals. She was an IAR with FSC Securities from 2007-2009 providing investment management, and retirement planning for individuals and families. From 2009-2011 she was an IAR with Valic Financial Advisers, which focused on the education and retirement planning for University faculty and staff.

Erin has been with Shuttleworth & Company (SCO) since 2011 initially working part-time as a Portfolio Assistant. Over the past five years, Erin has been serving clients as an Investment Advisor meeting their investment and financial planning needs. Erin has also earned the Chartered Financial Consultant-ChFC (2002) and Chartered Life Underwriter-CLU (2005) designations from the American College.

The ChFC is a financial designation offered through The American College, which includes a curriculum of eight College-level courses focused on practical application and real-life case studies. Topics include: the financial planning process; strategies for risk, income and retirement planning, investment, estate and gift, personal financial planning and specialized planning needs. Annual continuing education, which includes an ethics course is required to keep the designation in good standing. The designation is awarded by the American College, a non-profit educator founded in 1927 with a focus on educating leading financial advisors.

The CLU is also offered through the American College and is centered on the complexities of life insurance for both individuals and small businesses. The focus on the designation centers around providing guidance to clients on types and amounts of life insurance, annuity advisement, Risk Management associated with human capital, liabilities, property, and financial wealth. Guiding clients through decisions on estate planning, including advising on wills and trust arrangements, and providing guidance in specialized areas of your choice, with options including financial planning, income taxation, planning for retirement needs, investments, and working with people with disabilities and/or families caring for loved ones with special needs. Annual continuing education is required which includes a course on ethics to maintain in good standing and to use the designation.

Item 3: Disciplinary Information

To date no criminal disciplinary information is applicable for Erin M. Maynard.

Item 4: Other Business Activities and Affiliations

Erin M. Maynard is not involved in any other business activities nor has other business affiliations.

Item 5: Additional Compensation

Erin M. Maynard does not receive any additional compensation. The Management of SCO does not participate or condone additional compensation arrangements that extend, but are not limited to, the following: client referrals, sales compensation for non-client contacts, and soft-dollar arrangements.

Item 6: Supervision and Succession

Erin M. Maynard is supervised by President and CCO David L. Shuttleworth. There is one administrative employee that reports to Erin.

Item 7: Requirements for State-Registered Advisors

There are no additional disciplinary actions to disclose on behalf of Erin M. Maynard.

Part ADV Part 2B: Brochure Supplement

Shuttleworth & Company

Matthew R. Freiburger, CFA, CPA

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March 22, 2021

www.sco-advisors.com

This brochure supplement provides information about Matthew R. Freiburger (CRD#: 5207204) that supplements the Shuttleworth & Company brochure. Please contact David L. Shuttleworth at 614-760-7738 or by email at dave@sco-advisors.com if you have questions about the contents of this supplement.

Additional information about Matthew R. Freiburger is available on the SEC's website at www.advisorinfo.sec.

Portfolio Manager Educational Background and Business Experience

Item 2: Educational Background and Business Experience

Matthew R. Freiburger, born in 1980, received a BS in Business Management and Accounting with a Minor in Finance from Purdue University in 2002. He worked from 2002-2006 as a public accountant for Crowe (formerly Crowe Chizek & Co.) rotating between the South Bend, Indiana and Columbus, Ohio offices. Matthew was employed for a short time in 2006 at JPMorgan Chase where he served as an Internal Auditor.

With a passion for finance, Matthew moved on to be employed at Steele Investment Counsel, Ltd. from 2006-2019. Matthew quickly attained the Series 65 Investment Adviser Representative (IAR) license and Certified Public Accountant (CPA) license in 2007. He then successfully completed all three levels of the Chartered Financial Analyst (CFA) examinations in three consecutive years and obtained the CFA Charter in 2010.

Once completed, Matthew worked for several years as a Portfolio Manager focusing on the individual needs of families and small business owners. Matthew started January 2020 with Shuttleworth & Company where he is primarily a Portfolio Manager, serving to provide clients with asset management and financial guidance to reach their long-term financial goals.

CFA Institute is a global, not-for-profit organization comprising the world's largest association of investment professionals. With over 100,000 members, and regional societies around the world, the CFA Institute is dedicated to developing and promoting the highest educational, ethical, and professional standards in the investment industry. The CFA Program is a graduate-level self-study program that is organized into three levels, each culminating in a six-hour exam. Completing the Program takes most candidates between three and five years. To earn a CFA Charter, one must have four years of qualified investment work experience, become a member of CFA Institute, pledge to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct on an annual basis, apply for membership to a local CFA member society, and complete the CFA Program. More information about the CFA Institute and the CFA designation can be found at www.cfainstitute.org.

The Uniform CPA Examination protects the public interest by helping to ensure that only qualified individuals become licensed as U.S. Certified Public Accountants (CPAs). Individuals seeking to qualify as CPAs are required to pass the CPA Examination which currently consists of four sections that represent a total of 14 hours of testing. In the state of Ohio, one must successfully complete the CPA examination, successfully complete a professional standards and responsibilities course that emphasizes the Ohio accountancy law and Board rules, and have experience performing one or more services related to public accounting, as defined by Board rule. Generally, a minimum of one year of experience is required if a candidate has a bachelors degree and 150 semester hours of college credit prior to sitting for the CPA examination. More information about the CPA program can be found at www.aicpa.org and www.acc.ohio.gov.

Item 3: Disciplinary Information

To date no criminal disciplinary information is applicable for Matthew R. Freiburger.

Item 4: Other Business Activities and Affiliations

Matthew R. Freiburger is not involved in any other business activities nor has other business affiliations.

Item 5: Additional Compensation

Matthew R. Freiburger does not receive any additional compensation. The Management of SCO does not participate or condone additional compensation arrangements that extend, but are not limited to, the following: client referrals, sales compensation for non-client contacts, and soft-dollar arrangements.

Item 6: Supervision and Succession

Matthew R. Freiburger is supervised by President and CCO David L. Shuttleworth. There is one administrative employee that reports to Matthew.

Item 7: Requirements for State-Registered Advisors

There are no additional disciplinary actions to disclosure on behalf of Matthew R. Freiburger.