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## **FIRM BROCHURE (ADV Part 2A)**

This brochure provides information about the qualifications and business practices of Preisz Financial. Preisz Financial is an assumed business name for Preisz Associates, Inc. If you have any questions about the contents of this brochure, please contact us at (503) 224-1600 or email [info@preisz.com](mailto:info@preisz.com).

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Additional information about Preisz Financial is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and the CRD number for Preisz Financial is 144469.

Preisz Financial is a Registered Investment Advisor (RIA). Registration as a RIA does not imply a certain level of skill or training.

## Item 2: Summary of Material Changes

This section will discuss specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will ensure that clients receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of the Advisor's fiscal year. We will provide other ongoing disclosure information about material changes as necessary.

Since our last amendment, we have made the following material changes to properly coincide with services offered by our firm:

Item 4.I, Investment Advisory Services: we removed all LPL Programs that we do not currently offer to our advisory clients.

Item 5.I(a), (c) and 5.III, Fees and Compensation: Fee schedules have been added for Investment Advisory Services and Qualified Retirement Plan Advisory Services.

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## **Item 4. Advisory Business**

Preis Financial is a fee-based investment advisor in Portland, Oregon. Preis Associates was founded in 1991 by Michael Preis, was incorporated in 2000 to become Preis Associates, Inc., and in 2015 began operating under the assumed business name of Preis Financial. Michael Preis, Thomas Davenport and William Preis are the managing members and shareholders.

All Investment Advisory Services, Financial Planning/Consulting Services and Qualified Retirement Plan Advisory Services are provided through our investment advisor representatives and are personalized according to the individual needs of each client.

A summary of each service is provided below:

### **I. INVESTMENT ADVISORY SERVICES**

Investment advisory services include a review of the client's current asset positions, investment objectives, risk preferences, and overall financial plan. Advice is provided to clients regarding, but not limited to: mutual fund shares, fixed and variable annuities, certificates of deposit, United States government securities, corporate debt securities, and exchange-listed securities. Advice services may include financial fundamentals, accumulation goals, basic insurance analysis, and asset allocation management.

Advice is given on the appropriateness of investments and securities within the framework of a client's asset allocation model. Advice is not provided on the value of a specific security.

#### **Account Descriptions:**

We provide advisory services through certain programs sponsored by LPL Financial Corporation (hereinafter, "LPL"), a registered investment advisor and our firm's broker-dealer. Below is a brief description of each LPL advisory program offered through Preis Financial:

#### **a) Strategic Wealth Management Program (SWM II)**

Under the SWM II Program, we may purchase and sell on a discretionary or non-discretionary basis no load and load waived mutual funds and ETFs pursuant to investment objectives chosen by the client, liquidate previously purchased load mutual funds, and purchase and sell separate accounts within variable annuities. Other securities approved for investment in program accounts, including equities, fixed income securities, options, hedge funds, structured products and managed futures, may be purchased and sold at client's direction. In some cases, the client may grant us discretionary authorization for equities, fixed income securities, and options. Client may also elect for us to provide non-discretionary portfolio management services.

There is no minimum account value required for SWM II.

#### **b) Guided Wealth Portfolios (GWP)**

Guided Wealth Portfolios (GWP) is an advisor-enhanced automated solution that couples a digital investment platform with advisor oversight, review, and advice.

LPL is using FutureAdvisor's turnkey platform to outsource some of the operations, service support, and portfolio management overlay. We share fiduciary responsibility by providing an initial review of asset allocation and model at account opening and on an ongoing basis with a client review or after any updates that require a change in allocation occur. Also, client advice, if investment related questions come up, and do not receive any trading services.

GWP has a minimum account value of \$5,000 to enroll in the Managed Service.

### **c) Third Party Money Managers**

In certain circumstances we also provide advisory services for clients that act as a guardian, conservator or trustee. These accounts may require a court order for certain transactions and might be considered “restricted” accounts for a protected person. These account programs are currently sponsored by a Third Party Money Manager, Symmetry Partners.

## **II. FINANCIAL PLANNING/CONSULTING SERVICES**

We provide clients a comprehensive evaluation of their current financial state. Through careful analysis we will provide assistance to help clients reach their financial goals and objectives by projecting future cash-flows, asset values and withdrawal plans. Clients purchasing this service from us will receive written or electronic reports, or verbal directions for making financial decisions. In general, financial planning may include the evaluation of family records, budgeting, personal liability, estate information and financial goals. Educational, insurance and estate planning issues may also be included in the financial plan. Tax and cash flow analysis may also be provided, as well as income tax and spending analysis for past, current and future years. We may illustrate the impact of various investments on a client's current income tax and future tax liability.

We may also assist clients with retirement analysis by reviewing and proposing current strategies and investment plans to help the client achieve their financial goals. During the planning process, investments will be reviewed for the appropriateness, including standard and alternative investment choices, and the impact these investments may have on the client's financial plan. Additionally, advice may be given to assist clients with death and disability situations, including cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.

We gather information through in-depth personal interviews and questionnaires. Information gathered includes a client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents and questionnaires completed by the client to prepare the financial plan or recommendations. Should a client choose to implement the recommendations or suggestions in the plan, we suggest they work closely with their attorney, accountant, insurance agent, and/or other financial services providers for execution of the plan. Implementation of financial plan recommendations are entirely at the client's discretion. We do not provide any accounting or legal advice or services.

Typically our recommendations or financial plan will be presented to the client within 90 days of the contract date, provided that all information needed to prepare the financial plan has been provided by the client.

## **III. QUALIFIED RETIREMENT PLAN (QRP) ADVISORY SERVICES**

The firm provides Qualified Retirement Plan Advisory Services to pension, profit sharing and 401(k) plans. The services provided to a retirement plan will vary depending upon the depth of services desired and are comprised of Plan Sponsor and Plan Participant Services. These services are described on the next few pages:

## **QRP: PLAN SPONSOR SERVICES**

### One Time Platform/Vendor Search Service

The firm will initiate and manage a Request for Proposal (RFP) process to obtain proposals from several national record-keeping platforms. We will prepare a summary and comparison of up to four record-keeper responses. The summary will assist Plan Sponsors in identifying the cost of record-keeping services, plan administration services, investment management services and advisory services.

### One Time Platform/Vendor Transfer Service

If a decision is made to change platforms, the firm can be engaged to manage and implement the transfer. Transfer services include assisting with selecting a transfer methodology, distributing required employee notices, hosting employee education meetings and fielding participant/employee inquiries.

The firm does not provide plan administration services. Plan Sponsors should retain the services of an experienced plan administrator before initiating a transfer of plan assets.

### Investment Policy Statement Preparation and/or Review

We will assist in the design and preparation of an Investment Policy Statement (IPS) based upon consultation with the client reflecting the investment objectives, policies, and risk tolerance for the Plan. The IPS is then used to monitor the plan investments on an ongoing basis. We can also assist in the review, and modification as needed, of an existing IPS.

### Investment Selection and Ongoing Monitoring and Replacement Services

We screen the Plan's investment options using qualitative and quantitative criteria outlined in the clients IPS. We will make recommendations for the initial selection of investments offered by the plan based on the screening. We will deliver a report based on the Investment Policy Statement detailing fund quality and performance on a quarterly basis along with commentary on watch list funds, fund additions, and fund removals. In addition, we will provide ongoing investment monitoring services using the methodology outlined in the IPS.

### Education Services to Plan Trustees/Committee

We will provide education and/or training for the trustees and/or plan committee members with regard to understanding and meeting their fiduciary duties and responsibilities. Plan Sponsor Education Services are educational in nature. This service does not constitute legal advice.

### Plan Design Consulting

The advisor will review the current plan design. Recommendations for modifications/amendments will be provided based on the needs of the plan. Plan Sponsors should consult legal counsel before making any changes to their Plan Document.

### Fiduciary Services

Fiduciary relief services are available according to the scope of authority delegated to the firm. Under The Employee Retirement Income Security Act of 1974 (ERISA) §3(21)(a), co-fiduciary services are provided on a non-discretionary basis. Therefore, while the firm will be primarily liable for investment-related decisions, Preisz and the plan sponsor are co-fiduciaries and will jointly share in the responsibility to prudently select and monitor investment options. Plan Sponsors must adopt an Investment Policy Statement prior to engaging the firm as a §3(21)(a) co-fiduciary.

Under ERISA §3(38), fiduciary services are offered on a discretionary basis. As such, full discretion over plan investments is delegated to the firm and the plan sponsor will only be liable for demonstrating that it prudently selected and periodically monitors the firm.

### Plan Sponsor Service Reporting

As Plan Sponsor services are provided, the Retirement Plan Service Department tracks each contact with the client and employees. A service report containing a summary of contacts will be provided annually.

### Development of Asset Allocation Models

We will provide advice related to the construction and/or monitoring of risk-based asset allocation models using Modern Portfolio Theory. We will provide employees with educational materials related to the use of asset allocation models.

## **QRP: PLAN PARTICIPANT SERVICES**

### Participant Enrollment and Education Group Meetings

We will assist the client in educating and enrolling employees into the Plan. An agreed upon number of enrollment meetings and/or investment education seminars for employees and participants will be presented with an education focus on participant income.

### Individual Participant 401(k) Check-Ins and Retirement Readiness Projections

This service provides employees with an opportunity to meet one-on-one with our registered financial advisors, in a confidential setting, such as the Plan Sponsor's place of business. Financial advisors will assist participants with reviewing their account balance, current investment selection and a personalized risk assessment. In addition, a retirement income gap analysis will be completed.

### Ongoing Employee Phone and Email Support

Our team of Retirement Plan Service Specialists is available to provide guidance and support to plan sponsors and employees. Retirement Plan Service Department team members can help with questions related to distributions, loans, investment allocation and general account inquiries and are available by email or phone.

### Assets Under Management

As of December 31, 2020, Preisz Financial manages approximately \$247,297,884 for 64 accounts on a discretionary basis and \$245,620,879 for 311 accounts on a non-discretionary basis.

## **Item 5: Fees and Compensation**

### **I. INVESTMENT ADVISORY SERVICES**

#### Fees for LPL Advisory Programs:

a) Our Active Fee schedule for LPL SWM II accounts is noted below, Fees are generally negotiable and may vary from the standard schedules below based on the complexity of the account, size of the account, and other considerations. It is possible that individual clients may have fees higher or lower than the standard fee schedules below, based on fee schedules in place at the time the client relationship was initiated.

| <b>Account Balance</b>  | <b>Preis Financial<br/>Advisory Fee</b> | <b>LPL Financial,<br/>Broker-Dealer<br/>Fee</b> | <b>Total</b> |
|-------------------------|---|---|--------------|
| Up to \$250,000         | 1.40%                                   | 0.10%   | 1.50%        |
| \$250,001 - \$750,000   | 1.15%                                   | 0.10%   | 1.25%        |
| \$750,001 - \$5,000,000 | 0.90%                                   | 0.10%   | 1.00%        |
| \$5,000,001 - and Above | 0.65%                                   | 0.10%   | 0.75%        |

## All transaction charges are included

b) GWP account fees are as follows: Advisory Fee: 0.45%, Platform Fee: 0.35% Small Account Fee: \$20/year (under \$10,000) Exchange-Traded Fund (ETF) Weighted Average Expense Ratio: 0.15%

In addition to an investment advisory/management service fee, accounts may incur transaction costs, retirement plan administration fees, deferred sales charges on mutual funds initially deposited in the account, mutual fund marketing fees, and other mutual fund annual expenses as described in the fund's prospectus. No additional fees are paid to mutual fund portfolio managers other than what is stated in the mutual fund prospectus.

Fees are subject to change upon the Advisor giving the client thirty days notice in the manner prescribed in this Agreement. The client has the option of accepting the new fee schedule or terminating this Agreement pursuant to the termination provisions of the Agreement.

### c) Third Party Money Manager – Symmetry Partners - Advisory Programs Fees:

Account fees charged to the client include our fee and the fee for the third party money manager. Fees are assessed quarterly and deducted from the account. The standard fee schedules are negotiable and may differ depending on the distribution channel or financial advisor from which the client accesses Symmetry's portfolios and services. As a result, clients with similar assets may have differing fee schedules and pay different fees.

Standard Symmetry Fee Schedule:

| <u>Range Start</u> |         | <u>Range End</u> | <u>Sub-Advisor<br/>Preis Financial</u> | <u>Advisor<br/>Symmetry</u> | <u>Total</u> |
|--------------------|---------|------------------|--|-----------------------------|--------------|
| \$0                | to      | \$250,000        | 0.40%                                  | 0.50%                       | 0.90%        |
| \$250,001          | to      | \$750,000        | 0.35%                                  | 0.50%                       | 0.85%        |
| \$750,001          | to      | \$1,250,000      | 0.30%                                  | 0.50%-0.45%                 | 0.80%-0.75%  |
| \$1,250,001        | to      | \$2,000,000      | 0.25%                                  | 0.45%                       | 0.70%        |
| \$2,000,001        | to      | \$3,000,000      | 0.20%                                  | 0.45%                       | 0.65%        |
| \$3,000,001        | to      | \$5,000,000      | 0.15%                                  | 0.40%                       | 0.55%        |
| \$5,000,001        | to      | \$10,000,000     | 0.10%                                  | 0.40%                       | 0.50%        |
| \$10,000,001       | & Above |                  | 0.05%                                  | 0.40%                       | 0.45%        |

### Fees in General

All advisory fees are calculated quarterly and in arrears on the average daily balance of the Assets during the previous quarter. Advisory fees are automatically deducted from client accounts. The assets used in the advisory fee calculation will include all positions in the accounts, cash, declared and paid dividends, accrued income and interest payments, unless the position is specifically excluded or restricted from billing in writing by the client.

Clients may also be responsible for the transaction charges, fees and other expenses charged and imposed by the Custodian who holds the client assets, which includes, but is not limited to transactional fees, wire and transfer fees, commissions, account transfer fees (outbound); returned check fees; international security transfer fees; overnight mail and check fees; Rule 144 transfer fees; transfer agent fees and other fees charged by the custodian and independent of our advisory fee.

Additionally, any fees charged by third-party money managers are separate and in addition to our advisory fees. Clients may also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses). Accordingly, clients should review the fees charged by the investments, custodian, third-party managers and the advisory fee to fully understand the total amount of the fees



being paid. Additionally, the investments selected for the clients are not exclusively available to us and could be obtained through other unaffiliated firms and potentially at a lower fee.

Some representatives are licensed insurance agents (“Agents”) with separate and unaffiliated insurance companies. The Agents are able to purchase or sell insurance products or services (including fixed annuities) for separate and additional compensation. This compensation is not credited against the advisory fees paid to us. This may create a conflict of interest to sell a product that produces a commission that would be larger than the advisory fee. In all cases, we must make recommendations that are in the best interest of the client.

## **II. FINANCIAL PLANNING SERVICES**

We charge financial planning clients fixed annual fees, typically ranging from \$500 to \$6,000 per year, depending on each client’s circumstances and the nature and complexity of the services provided.

### Consulting Services

We charge clients negotiable, consulting fees on either an hourly rate or fixed fee basis. The standard hourly rate is \$250 for consulting services.

Fixed fees for financial plans or consultation services will be billed directly to the client and may be payable in advance. Upon termination, any unearned fees will be refunded on a pro-rata basis.

Under no circumstances will we have clients pay fees in excess of \$1,200 more than six months in advance of services rendered.

## **III. QUALIFIED RETIREMENT PLAN (QRP) ADVISORY SERVICES**

Fees for Qualified Retirement Plan Advisory Services depend on the relationship desired by each Plan Sponsor. Fees for services may be charged based on assets, at a flat fee for a certain scope of services, or at an hourly rate. Fees vary based on the nature of the engagement, services provided, and the size of the plan.

Asset-based fees are based upon the size of the plan and the desired services. Fees range from 5 basis points (0.05%) to 75 basis points (0.75%). These fees may or may not be combined with a flat fee for a certain scope of service depending upon the engagement. Fees are generally negotiable and may vary from the schedule below based on the complexity of the account, size of the account, number of participants and other considerations. The maximum fee schedule for Qualified Retirement Plan Advisory Services is as follows:

**Preis Financial  
Qualified Retirement Plan Advisory  
Maximum Fee Schedule**

| <b>Plan Balance</b>          | <b>Fee (bps)</b>        |
|------------------------------|-------------------------|
| \$0 to \$1,000,000           | 75                      |
| \$1,000,000 to \$2,000,000   | 60                      |
| \$2,000,000 to \$3,000,000   | 50                      |
| \$3,000,000 to \$4,000,000   | 40                      |
| \$4,000,000 to \$7,500,000   | 30                      |
| \$7,500,000 to \$15,000,000  | 25                      |
| \$15,000,000 to \$25,000,000 | 20                      |
| \$25,000,000+                | 15 (bps) or<br>flat fee |



The terms regarding payment and types of fees will be clearly set forth and agreed upon prior to engagement and documented in the Retirement Plan Investment Advisory Agreement.

Invoices may be paid by the Plan or by the Plan Sponsor depending upon the nature of the services provided and the Sponsor's desire for payment method. Invoices are typically done in arrears. Certain prepayments of project-based work may be required, usually at a 50% of the flat fee.

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

We do not charge any fees based on a share of capital gains or capital appreciation of the assets of a client.

#### **Item 7: Types of Clients**

We provide advisory services to a variety of clients including individuals, pension and profit sharing plans, non-profits, trusts, estates, corporations and business entities.

Other than stated minimum required account values (see Item 4), there are no specific requirements for opening or maintaining an account.

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

Our firm utilizes the following methods of analysis to formulate client recommendations:

##### Mutual fund and/or ETF analysis:

We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other funds in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the fund or ETF less suitable of the client's portfolio.

##### 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 (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

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.

##### Asset Allocation:

Rather than focusing primarily on security selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

## **Risks**

**Financial Planning:** Risks associated with the financial planning process include the possibility that the investment performance, interest rates, inflation assumptions, and longevity assumptions used in the development of client's financial plan turn out to be materially different than the actual future investment performance, interest rate, inflation and life span. Differences between the assumptions used in the plan and actual events can materially affect the results of the financial plan over long periods of time. While we base our assumptions on historical information, clients must acknowledge that past performance or events might not be indicative of the future returns.

**Investing:** Investing is not without risk, and involves the risk of loss of principal which clients should be prepared to bear. We use several strategies to try to reduce risk, including diversifying a portfolio across multiple asset classes. Despite these strategies, every asset class has experienced severe declines in value, sometimes over many years.

**Asset Class Risk:** Securities in client portfolios or in underlying investments such as mutual funds may underperform in comparison to the general securities markets or other asset classes.

**Issuer Risk:** Client account performance depends on the performance of individual securities selected in client accounts. Any issuer may perform poorly or be unable to continue operations, causing the value of its securities to decline or default.

**Management Risk:** The performance of client accounts is subject to the risk that our investment management strategy may not produce the intended results.

**Market Risk:** Client accounts can lose money over short periods due to short-term market movements and over longer periods during market downturns. The value of a security may decline due to general market conditions, economic trends, or events that are not specifically related to the issuer of the security or to factors that affect a particular industry or industries.

**Passive Investment Risk:** We may use a passive investment strategy that is not actively managed where we do not attempt to take defensive positions in declining markets.

**Liquidity Risk:** A security may not be able to be sold at the time desired which can impact performance.

**Interest Rate Risk:** An increase in interest rates may cause the value of fixed income securities and funds that hold these securities to decline in value. Securities with longer durations tend to be more sensitive to interest rate changes, usually making them more volatile than securities with shorter durations.

**Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

**Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

**Reinvestment Risk:** This is a risk that future proceeds from fixed income investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate).

**Business Risk:** These risks are associated with a particular industry or a particular company within an industry.

**Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad.

## **Item 9: Disciplinary Information**

Our firm has no reportable disciplinary events to disclose.

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

If there is a potential conflict of interest that arises, we want clients to be aware that the receipt of any additional compensation by our firm and its management persons or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. We endeavor at all times to put the interest of our clients first as part of our fiduciary duty as a Registered Investment Advisor and take the following steps to address this conflict:

- We disclose to clients the existence of all material conflicts of interest, including the potential for our firm and its employees to earn compensation from advisory clients in addition to our advisory fees;
- We disclose to clients that they are not obligated to purchase any recommended investment advisory or insurance products or services from our employees;
- We collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- Our management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- We require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- We periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
- We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

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

We have implemented policies and procedures to govern our employees and to mitigate the conflicts of interest we encounter when providing our advisory services to clients. These include:

- A Code of Ethics that each employee is required to review and sign an acknowledgement of receipt and understanding (upon hire, and annually);
- Prohibitions on the misuse of material non-public information;
- Personal securities trading policies and procedures (governing not only our employee but also the members of their household and any other securities or brokerage accounts where they have beneficial ownership of with a spouse, family member or other person).

Employees are not allowed to:

- *Trade on inside information.*
- *“Front-run” or trade in anticipation of client transactions.*
- *Trade or participate in any activity prohibited under the federal securities laws.*
- *Place their interests in front of clients.*

We strive to achieve the highest ethical and fiduciary standards (in dealing with Clients, the public, vendors, prospective clients and each other). As a fiduciary, we have an affirmative duty to act with integrity, competence and care; this includes disclosing all potential and actual conflicts of interest.

We perform services for various other clients. We may give advice or take actions for our clients that differ from the advice given to other clients. The timing or nature of any action taken for all clients or other sponsors may also vary. For more information or to request a copy of our Code of Ethics, please contact us at (503) 224-1600.

## **Item 12: Brokerage Practices**

We do not have any formal or informal soft-dollar arrangements and do not receive any soft-dollar benefits.

We do not request or accept the discretionary authority to determine the broker dealer to be used for client accounts. For clients in need of brokerage or custodial services, and depending on client circumstances and needs, we will generally recommend the services of LPL and ourselves, as registered representatives of LPL. Our clients should evaluate this broker before opening an account. The factors considered by our firm when making this recommendation are the broker's ability to provide professional services, our experience with the broker, the broker's reputation, and the broker's quality of execution services and costs of such services, among other factors. Please refer to Items 5 and 10 of this brochure for a more detailed description of our relationship with LPL and the policies implemented by our firm to monitor and mitigate the existing conflicts of interest.

The firm may offer clients the opportunity to use third party money managers such as Symmetry (See Item 4).

***Clients are not under any obligation to effect trades through any recommended broker.***

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

Client accounts are reviewed on at least an annual basis by the representative or their assignees. However, clients and/or representative may request more frequent reviews. There are many factors that might bring about a review of accounts, including regular review dates, supervision reviews, economic changes, political disruptions or other market activity. A review includes the performance of the accounts and positions. It is critical that clients report any changes in their financial situation so we can ensure they are invested properly.

For those clients engaging us for consulting services, we will not provide any ongoing reviews or reports beyond those specifically outlined in the advisory agreement(s).

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

While we do receive occasional referrals from clients and other professional service providers, we do not have any formal arrangements in place for referrals. Nor do we compensate any person or entity for referrals.

### **Item 15: Custody**

Our firm does not have actual or constructive custody of client accounts and will not accept custody of any client asset.

We previously disclosed in the Fees and Compensation section (Item 5) of this brochure that our firm or the programs in which we may recommend to client's directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

It is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

### **Item 16: Investment Discretion**

For Investment Advisory Services, outlined in Item 4, we generally accept non-discretionary authority to manage securities accounts on behalf of clients. However management personnel, and our adviser representatives in their individual capacities as registered representatives of LPL may exercise discretion on behalf of client advisory accounts for the purchase/sale of securities, selection of asset allocations, and selection/replacement of third-party managers.

For Qualified Retirement Plan Advisory Services, outlined in Item 4, we accept both discretionary and non-discretionary authority to manage securities accounts depending on the depth of services agreement authorized by the Plan Sponsor.

**Item 17: Voting Client Securities**

Clients will receive their proxies and other solicitations directly from their custodian or transfer agent and retain sole responsibility for voting. However, we may provide clients with consulting assistance regarding proxy issues if they contact us with questions at our principal place of business.

We will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are 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 us to transmit copies of class action notices to the client or a third party. Upon such direction, we will make commercially reasonable efforts to forward such notices in a timely manner.

**Item 18: Financial Information**

We are not aware of any circumstance that is reasonably likely to impair our ability to meet contractual commitments to clients. We do not require pre-payment of advisory fees in excess of \$1,200 and more than six months in advance.