

Form ADV Part 2A
(Firm Brochure)

September 30, 2021

Quantum Financial Planning Services, Inc.

1212 N. Washington St. Suite 220

Spokane, WA 99201

Phone: 509-328-6653

Fax: 509-328-1469

www.quantumplanning.com

quantumteam@quantumplanning.com

CRD # 115877

This brochure provides information about the qualifications and investment advisory business practices of Quantum Financial Planning Services, Inc., an investment adviser registered with the Securities and Exchange Commission. Registration does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us by phone at: 509-328-6653 or by email at QuantumTeam@quantumplanning.com. 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.

Additional information about Quantum Financial Planning Services, Inc. is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by our unique identifying number known as a CRD number: 115877.

Item 2 Material Changes

Annual Update

Quantum Financial Planning Services, Inc. updates its ADV Part 2A annually, or more frequently in the event of certain material changes. Below is a summary of the material changes made to this brochure since our last annual update in October 2020.

Item 4 Advisory Business: We have added a new financial planning process designed with high producing real estate professionals in mind. Please see Item 4 and Item 5 of this brochure for details of this new service.

We encourage you to read this brochure in its entirety.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at 509-328-6653, or by email at QuantumTeam@quantumplanning.com.

Item 3 Table of Contents

Item 2 Material Changes	ii
Annual Update	ii
Full Brochure Available	ii
Item 4 Advisory Business.....	1
Firm Description.....	1
Types of Advisory Services.....	2
Tailored Relationships	5
Asset Management.....	5
Assets Under Management and Advisement.....	5
Item 5 Fees and Compensation.....	5
Description of Fees	5
Fee Billing	6
Termination of Agreement	7
Other Fees	8
Past Due Accounts	8
Item 6 Performance-Based Fees	9
Sharing of Capital Gains	9
Item 7 Types of Clients	9
Description	9
Account Minimums on Asset Monitoring Service	9
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss	9
Methods of Analysis.....	9
Investment Strategies	9
Risk of Loss	10
Item 9 Disciplinary Information	11
Legal and Disciplinary.....	11
Item 10 Other Financial Industry Activities and Affiliations	11
Financial Industry Activities.....	11

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	11
Code of Ethics.....	11
Participation or Interest in Client Transactions.....	11
Item 12 Brokerage Practices	12
Selecting a Brokerage Firm	12
Best Execution	12
Soft Dollar and Other Benefits	12
Brokerage for Client Referrals.....	13
Directed Brokerage	13
Order Aggregation	13
Item 13 Review of Accounts.....	14
Periodic Reviews	14
Review Triggers.....	14
Regular Statements and Reports.....	14
Item 14 Client Referrals and Other Compensation.....	14
Additional Compensation	14
Incoming Referrals.....	14
Referrals Out	14
Item 15 Custody.....	14
Custody of Client Assets.....	14
Account Statements.....	15
Item 16 Investment Discretion	15
Discretionary Authority for Trading.....	15
Item 17 Voting Client Securities.....	16
Proxy Votes	16
Item 18 Financial Information.....	16
Financial Condition	16

Item 4 Advisory Business

Firm Description

Quantum Financial Planning Services Inc. ("Quantum," "us," or "we") is an SEC-registered investment adviser founded in 1979. Quantum is owned by C. Eric Christiansen, Micah Coski, and Jordan Curnutt.

We are a fee-only, comprehensive financial planning and investment advisory firm. We provide personalized confidential financial planning and investment management to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning and estate planning.

OUR MISSION

Quantum was founded with the purpose of providing assistance in the planning of a client's overall financial affairs. Quantum practices independent comprehensive financial planning, which includes two major components: financial planning, including initial planning and ongoing review of financial planning goals (Asset Monitoring Services), and the design and monitoring of investment portfolios.

Our goal is to staff Quantum with a team of professionals qualified to assist our clients in achieving their financial objectives. We work with the client and his or her other trusted professionals, providing financial planning consultation and overall coordination on a personal basis.

Quantum offers investments advisory services through its Investment Advisory and Financial Planning Agreement. Our advice is tailored to your individual needs and goals. A written evaluation of each client's initial situation is provided to the client, often in the form of a cash flow illustration or net worth statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

The initial meeting we have with prospective clients, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. When we recommend another professional to a client, we do not receive any direct or indirect compensation from that referral. To further avoid conflicts of interest, we do not

recommend clients to related persons of our planners where such referral could lead to a commission for that related person. Although we do not expect there to be other conflicts of interest relating to recommendations and/or use of other professionals, such conflicts will be disclosed to the client at the time of engagement whenever applicable.

Types of Advisory Services

INITIAL OR ONE-TIME FINANCIAL PLANNING SERVICES

We typically begin a new client relationship with comprehensive financial planning services, which focus on the client's personal goals such as funding children's college education, achieving financial independence, and providing adequate funds for dependents in the event of premature death. Typical client concerns are listed on the schedule titled *Financial Planning Services* attached to the Client Agreement.

Our goal is to determine the optimum course of action for the realization of client financial planning objectives, taking into consideration client needs, earning power, financial resources and particular aversion to risk.

Clients are provided with personalized written and oral financial planning advice designed to help them to identify, prioritize and achieve their financial goals in all areas. Such advice normally involves the development of specific strategies, alternatives and integrated solutions.

At the client's request we will offer limited scope financial planning services. For example, research on investments brought to us by the client and with which we are unfamiliar would fall into this category. The scope of one-time, miscellaneous financial planning services will be detailed in the *Financial Planning Services* schedule attached to the Client Agreement.

FINANCIAL PLANNING ADVISORY SERVICES

Financial planning advisory services involve reviewing the client's financial affairs, creating a written financial plan, aiding the client in implementing agreed upon recommendations, including asset allocation, and providing ongoing monitoring of goals and objectives.

The process begins with an initial consultation offered at no charge. The purpose is to determine if the client can benefit from financial planning and to what extent our services are needed. Before work begins, the scope of the work and the fee are agreed upon and the Client Agreement with the *Financial Planning Services* schedule is executed.

Financial planning requires a clear understanding of the client's current situation. Areas of examination include assets, liabilities, income, expenses, potential income taxes and estate taxes, trust agreements, wills, investments, insurance,

personal and family obligations, employee benefit programs and careful consideration of investment vehicles. The client is expected to provide complete information in all relevant areas. Quantum maintains stringent client and data privacy policies and we will keep all of your information and the recommendations furnished to you in confidence.

The various areas of client concern and recommendations are discussed orally and in writing in a series of meetings with the client. Upon agreement of specific recommendations an approved course of action is implemented.

INITIAL ASSET ALLOCATION

This service is designed for those clients having no need or desire for financial planning, but who desire investment planning services. These may include pension plans, children's trust, or clients who desire to monitor their own investments after the initial allocation is made. Quantum analyzes the client's current investments and makes recommendations regarding the retention, purchase, or sale of investments. As much as possible, we attempt to move the client's portfolio toward the asset allocation mix of our current model appropriate for the goals and risk aversion of the particular client.

ONGOING FINANCIAL PLANNING SERVICE

We have identified specific needs present with high producing real estate professionals and have designed a comprehensive financial planning program tailored to these individuals. We believe such professionals have unique circumstances that don't impact most other professionals, or don't impact them in the same manner. We tailor this service to the client's specific scenario, and typically provide the following:

- Financial goal setting
- Analysis and recommendations of cash management solutions
- Evaluation of current investments, concentrations in one asset class, and overall net worth
- Tax planning considerations
- Modeling of rental income
- Coordination with your other professionals, as needed

This is an ongoing monthly service for a flat monthly fee. We provide this service only after completing our initial financial planning services for a flat fee. See Item 5 of this brochure for fee information.

ASSET MONITORING AND ONGOING FINANCIAL PLANNING SERVICES

After the initial planning process, the client's goals and economic conditions continue to change. Revisions in the tax law, changes in inflation, fluctuation in interest rates and instability in investment mediums, combined with changes in the client's personal situation, require that financial and tax planning is an ongoing process.

Quantum offers asset monitoring and ongoing financial planning and goal tracking services to provide periodic review and revisions of the major components of a client's financial plan to help assure that goals are being achieved. These services may include semi-annual financial reports projecting current year taxes and cash flow, and summarizing individual investments.

Our ongoing services are available only to clients who have completed the initial financial planning process. Ongoing asset monitoring and financial planning does not include the monitoring, review or surveillance of investment of other assets.

Below are some services included in our Asset Monitoring Services.

INVESTMENT SERVICES

These services include the design and construction of an investment portfolio consistent with the client's financial constraints and objectives, risk tolerance and prevailing economic conditions.

Economic factors such as the supply of money, various interest rates and changes in inflation are analyzed to help predict the future economic environment which, in turn, guides our asset allocation model and the selection of investments suitable for particular investment portfolios. Political factors are considered in those areas that impact our overall economic environment.

Our asset allocation model helps us to determine what types of assets to include or exclude from portfolio considerations and in what proportion those asset types should be held. We do not adhere to the principle of attempting to "time" the market nor do we attempt to "switch" to a particular asset class to take advantage of peculiar and temporary insights into the capital markets.

ONGOING ASSET ALLOCATION AND MONITORING

Quantum monitors the client's investment portfolio and makes investment recommendations as we believe they are needed. All or a portion of the client's investment portfolio may be monitored as agreed.

A list of assets to be monitored is incorporated as part of the initial Client Agreement and is updated on a regular basis. Assets that may be excluded are individual real properties, assets the client wishes to monitor, or assets we cannot or do not wish to monitor. Quantum will monitor all investments that the client has purchased at our recommendation through the associate.

The client's investment portfolio will be scrutinized and reevaluated on a regular basis. Quantum will assist in implementing any recommended changes. The client acknowledges the risk involved in any investment and that any one investment may or may not perform as expected.

Tailored Relationships

Quantum services are always provided based on the individual needs of each client. This means, for example, that individual clients are given the ability to impose restrictions on the accounts under management, including specific investment selections and sectors. We work with each client on a one-on-one basis through interviews and ongoing conversation to determine the client's investment objectives and suitability information.

Asset Management

Assets are invested primarily in mutual funds through a brokerage account. Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities, and U. S. government securities. Investments in private placements are not available through Quantum.

Assets Under Management and Advisement

As of September 30, 2021, Quantum's assets under management and advisement totaled \$501,465,768. Of this amount, \$457,310,722 are considered *Regulatory Assets Under Management* (Regulatory AUM) and were directly managed by Quantum. \$429,164,546 of our Regulatory AUM was managed on a discretionary basis and \$28,146,176 was managed on a non-discretionary basis. Our assets under advisement (Non-Regulatory AUM), which were all non-discretionary assets held away from our firm, totaled \$44,155,046.

Item 5 Fees and Compensation

Description of Fees

Quantum charges for its investment advisory services in a number of different ways. These include fees based on a percentage of assets under management, assets under advisory, hourly charges, fixed fees, or a combination of these. One-time and initial financial planning services are priced based on the complexity of work associated with the client's situation. Lower fees for comparable services may be available from other sources.

All fees are negotiable. Quantum, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Under no circumstances will a fee more than \$1200 be collected six months or more in advance.

Clients are advised that the investment recommendations and advice offered by Quantum does not constitute legal or accounting advice. Therefore, you should coordinate and discuss the impact of financial advice with your attorney and/or accountant. Clients are advised that it is necessary to inform Quantum promptly with respect to any changes in their financial situation, investment goals and objectives. Failure to notify Quantum of any such changes could result in investment recommendations not meeting the needs of the client.

Fee Billing

ASSET MONITORING AND ONGOING FINANCIAL PLANNING SERVICES

We charge an annual percentage fee of the client's assets under management, billed quarterly. Our maximum tiered and blended client fee schedule is detailed below. When determining the asset level for fee billing purposes we consider all accounts within a client's identified household.

<u>Assets Under Management</u>	<u>Maximum Annual Fee</u>
Under \$250,000	See Minimum Annual Fee below
\$250,001 to \$3 million	1.05%
Over \$3 million	.5%

The above fee schedule results in a blended rate for assets over \$250,000. This means we charge one rate on the first tier of assets under management and a different rate on the subsequent tiers of assets under management.

Minimum Annual Fee

Assets under \$250,000 any given quarter are billed a flat fee of \$625 that quarter, $\frac{1}{4}$ of our minimum annual fee of \$2500. This means a client with total household assets under management of less than \$250,000 any given quarter will pay a flat fee of \$625 that quarter, even if total household assets are above \$250,000 one or more other quarters during the calendar year. Charging a minimum quarterly fee results in a higher annual percentage rate than our stated maximum fee for assets over \$250,000.

We bill our ongoing asset management fees quarterly in advance or arrears, depending on your Client Agreement with us. Although we have a small number of legacy clients we bill semiannually, we do not offer this billing structure to new clients.

The initial asset management fee billing for a new client will begin as described in that client's Client Agreement.

We value assets on the last day of the previous billing period for fee billing purposes. Quantum does not independently value assets; fees are assessed solely on the values provided by the custodian or a third-party data aggregator. If

the custodian or third-party aggregator does not provide an account value for that date, we will use the next closest date for which a value is available.

INITIAL AND ONE-TIME FINANCIAL PLANNING SERVICES FEES

We charge an hourly fee, or we propose a flat rate based on estimated time involved. Our financial planning services fee will be detailed in our Client Agreement with you. Under no circumstances will a fee in excess of \$1200.00 be collected 6 months or more in advance. Our standard hourly fees are:

- \$250.00 per planner/hour
- \$75.00 per support staff/hour

Financial planning services are invoiced at one or more interim points during a project, or at the end of a project, as described in the client's Client Agreement.

INITIAL ASSET ALLOCATION

A combination of financial planning fees (hourly/flat) discussed above will be charged when the work includes several different areas of assistance significantly different from the norm or when the assets are expected to vary greatly over the period of the agreement.

ONGOING FINANCIAL PLANNING SERVICES MONTHLY FEE

We charge an ongoing, flat fee each month for our top producing real estate professional financial planning service. We discount this fee for clients who also use our ongoing asset allocation and monitoring services and have a certain level of assets under management with our firm. Your specific monthly fee will be detailed in our service agreement with you.

<u>Assets Under Management</u>	<u>Monthly Fee</u>
Under \$500,000	\$250
\$500,000 to \$1 million	\$125
Over \$1 million	\$0

Termination of Agreement

A client may terminate their Client Agreement with Quantum at any time.. As applicable, we will refund any unearned fees based on work completed (for flat rate services), on a pro-rated basis from the date we receive the written notice of termination through the end of the billing period (for asset monitoring fees billed in advance as a percentage of assets under management). For financial planning projects we will bill for work completed, but not yet invoiced. We do not charge for partial months for our ongoing monthly fee so this service terminated during a calendar month will not be billed for that month.

Other Fees

Custodians typically charge transaction fees on purchases or sales of certain investments, including mutual funds. These transaction charges are usually small and incidental to the purchase or sale of a security.

In our standard investment models Quantum typically selects mutual funds with lower cost internal expense ratios and the client pays the standard transaction fee on the purchase or sale of such mutual funds (the transaction fee is paid to a third party and Quantum does not receive any part of this fee). However, we also offer another investment option, a No Transaction Fee (NTF) Model, which may be a suitable choice for investment portfolios less than \$80,000. There is no transaction fee charged in the NTF Model, but the mutual funds' internal expense ratios are usually higher as a result. We will analyze the cost difference of the NTF Model vs our standard model and recommend the option we believe is in your best interest. Quantum's advisory fee does not change, nor do we receive any other financial benefit, from our clients' use of one model over the other.

You are responsible for any and all account charges by your custodian, including standard broker-dealer transaction charges and confirmation fees, wire transfer fees, and other fees which may be assessed to your account that we manage. You will pay separately for IRA custodial services and may be assessed inactivity fees.

All fees paid to Quantum for investment advisor services are separate and distinct from the fees and expenses charged by the investment company sponsors and managers. Fees for these products are described in the investment prospectus. These fees generally include a management fee, other fund expenses, and a possible distribution fee. We recommend only no-load share classes for mutual funds and do not receive any commissions or other sales charges on any products. It is important to be aware, however, that if you have an existing mutual fund position when your assets transfer into us, the fund company could impose a deferred sales charge when you liquidate a B or C share class position. A complete explanation of the product-related fees and expenses is contained in the prospectus for the particular investment product.

While we do not currently recommend illiquid assets for our clients (e.g., illiquid REITs), a client may have a legacy position in an illiquid security; we do not include illiquid assets in the calculation of our advisory fees.

Past Due Accounts

Quantum reserves the right to stop work on any account that is more than 90 days overdue. In addition, Quantum reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in Quantum's judgment, to providing proper financial advice. Any unearned portion of fees collected in advance will be refunded within 30 days.

Item 6 Performance-Based Fees

Sharing of Capital Gains

Our fees are never based on a share of the capital gains or capital appreciation of managed securities. Quantum does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client for the potential of a higher return.

Item 7 Types of Clients

Description

Quantum generally provides investment advice to individuals, small business owners, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums on Asset Monitoring Service

While we do not currently have a minimum account size, we do charge a minimum annual fee for clients with total assets under management of less than \$250,000. See Item 5 of this brochure for more information on the fees we charge.

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

Methods of Analysis

To determine investment advice and formulate recommendations, Quantum starts from a macro approach, evaluating the total allocation percentage to each asset class (stocks, bonds and cash) based on a client's investment time horizon, risk and/or loss aversion, near term expenditures, ability to handle volatility, etc. Quantum then further analyze their holdings to each sector within each asset class (International stocks, domestic stocks, long/short term bonds, precious metals, cash, REIT's, etc.).

The main sources of research information Quantum uses include financial newspapers and magazines, research materials prepared by others, prospectuses, company press releases, as well as other information made generally available. Quantum may also use Morningstar Advisor in its research.

Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation. We primarily use actively-managed funds and our portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. We set a target allocation with each individual client and then we reallocate each individual client portfolio on a semi-annual or annual basis back towards the selected target allocation.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **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 the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **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. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Item 9 Disciplinary Information

Legal and Disciplinary

We are required to disclose any legal or disciplinary events that are material to your evaluation of our advisory business or the integrity of our management of your account. Neither Quantum nor its employees have been involved in legal or disciplinary events or have anything reportable events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

Financial Industry Activities

Quantum is an independent investment advisory firm and only provides investment advisory services. The firm is not engaged in any other business activities and offers no other services than those described in this Disclosure Brochure. Neither Quantum nor its associates has any registrations or other material relationships with a broker-dealer or other registered entity.

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

Code of Ethics

Quantum has adopted a Code of Ethics ("the Code"), which sets forth the high ethical standards of business conduct that we expect of our employees, including compliance with applicable federal securities laws. Employees must avoid situations where their personal interests conflict with the interest of our clients. The firm's Code of Ethics is designed to ensure we meet our fiduciary obligations to you and to detect and prevent violations of securities laws. Our Code of Ethics includes:

- Requirements to retain the confidentiality of our clients' personal, business and financial information
- Prohibitions on insider trading
- Reports of gifts and business entertainment
- Reporting and oversight of Quantum associates' personal securities transactions

A copy of our Code of Ethics is available to current and prospective clients. You may request a copy by email to QuantumTeam@quantumplanning.com.

Participation or Interest in Client Transactions

Quantum and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades.

Item 12 Brokerage Practices

Selecting a Brokerage Firm

As part of our asset management and asset monitoring services Quantum recommends TD Ameritrade Institutional, Division of TD Ameritrade, Inc., ("TD Ameritrade"), member FINRA/SIPC, as your custodian and broker-dealer. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. Specific custodian or investment company recommendations are made to clients based on their need for such services. We have selected TD Ameritrade based on price, reliability, speed of processing, tools and best execution," in addition to the integrity and financial responsibility of the firm.

Best Execution

Most of Quantum's investment accounts are invested into mutual funds. These accounts are held in a brokerage account. Quantum does not regularly advise investing in individual stocks in our client's portfolios. Clients may elect to invest in some individual stocks, but very few stock trades occur annually and we do not review best execution regularly. To meet our best execution obligations, we consider overall cost to the client, including costs related to mutual fund share class and transaction fees. Please see Item 5 of this brochure under the section titles, "Other Fees," for discussion of our practices as well as share class and transaction costs related to our selection of mutual funds.

Soft Dollar and Other Benefits

Quantum does not have any soft dollar arrangements. However, Quantum participates in the institutional advisor program (the "Program") offered by TD Ameritrade. TD Ameritrade offers services to independent investment advisors which include custody of securities, trade execution, clearance and settlement of transactions. We receive benefits through product and services from TD Ameritrade through our participation in the Program. Some of these products and services benefit Quantum, but do not benefit Clients accounts directly, although these benefits often assist us in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. We consider the value of various services, including research or additional brokerage products a broker-dealer has provided or may be willing to provide to us.

Because many of the services or products are considered a benefit to Quantum, we have a conflict of interest in allocating client brokerage business: we receive valuable benefits by selecting TD Ameritrade to custody client assets and execute client transactions and fees charged by that broker or dealer might not be the lowest we might otherwise be able to negotiate. There is no direct link between our participation in the Program and the investment advice we give our Clients, although the economic benefits we receive through our participation in the Program are not typically available to TD Ameritrade retail investors.

Benefits we receive from TD include:

- receipt of duplicate Client statements and confirmations;
- research-related products and tools;
- consulting services;
- access to a trading desk serving Program participants
- access to block trading
- direct debit of advisory fees from client accounts;
- access to an electronic communications network for client order entry and account information; and
- discounts on third-party vendor compliance, marketing, research, technology, and practice management products or services.

Services made available by TD Ameritrade are intended to help Quantum manage and further develop our business enterprise. The benefits that we receive through participation in TD Ameritrade's Program do not depend on the amount of brokerage transactions direct to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by Quantum or our associated persons in and of itself creates a potential conflict of interest and may indirectly influence our choice of TD Ameritrade for custody and brokerage services. As part of our fiduciary duty to clients, we endeavor at all times to put the interests of our clients first.

Brokerage for Client Referrals

We do not consider client referrals as a factor in selecting or recommending broker-dealers. We also have no arrangements or processes in place to direct client transactions to a particular broker-dealer in return for client referrals.

Directed Brokerage

Because we generally require clients to execute trades in accounts under our management through TD Ameritrade as custodian, we are effectively requiring clients to "direct" their brokerage to TD Ameritrade. Not all advisers execute through a single broker-dealer or require their clients to do so. Because we are not selecting a broker-dealer on a trade-by-trade basis, we may not be able to achieve the most favorable execution of client transactions and this practice may cost clients more money. TD Ameritrade, however, permits trade aggregation, and is itself obligated to seek best execution for the trades executed through TD Ameritrade.

Notwithstanding the above, we may, on a case-by-case basis, accept instruction from you to direct transactions to a broker dealer other than TD Ameritrade.

Order Aggregation

We do not generally aggregate buys and sales since most trades are in mutual funds where trade aggregation does not garner any client benefit.

Item 13 Review of Accounts

Periodic Reviews

Account reviews are performed at least annually by advisors. Account reviews are performed more frequently when agreed to between advisor and client, or when market conditions dictate.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Regular Statements and Reports

Clients receive statements at least quarterly from the qualified custodian at which their accounts are maintained. Performance reporting is reviewed during Client meetings and is available daily to Clients via our client portal. We also provide periodic performance reporting to Clients upon request in hard copy or digital report format. Clients are encouraged to always compare reports provided by Quantum against the account statements delivered from the qualified custodian.

Item 14 Client Referrals and Other Compensation

Additional Compensation

Quantum receives certain economic benefits from TD Ameritrade, described above in Item 12 under the section describing "Soft Dollar and Other Benefits."

Incoming Referrals

Quantum has been fortunate to receive many client referrals over the years. The referrals have come from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

Quantum does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Item 15 Custody

Custody of Client Assets

All client funds and securities are held at a qualified custodians. Our clients will receive account statements directly from the custodians to the client's address of record at least quarterly. We urge clients to carefully review their statements and carefully compare the custodian's account statement with the periodic statements and report received from us, and to notify us promptly of any discrepancies.

Quantum has custody of certain 401(k) participant assets by virtue of being given online access by the client to those assets. When Quantum has such custody, we

engage an independent CPA firm each year to perform a surprise audit of those assets where we have been deemed to have custody. The auditor uploads an Accountant Surprise Examination Report, available to the public by searching under Quantum's name or CRD number at <https://www.adviserinfo.sec.gov>.

Quantum has the ability to deduct our advisory fees directly from client accounts based on the Client's written authorization to do so, and this ability is technically considered "custody" but doesn't require separate reporting or surprise audits. In addition, our Clients at times provide us with signed standing letters of authorization ("SLOAs") to send money to third parties. These are written and signed directives from the client authorizing us to initiate payments from their custodial accounts to specified third parties. This authority is considered "custody" under current regulatory guidance and requires us to report that we have custody over these account assets on our Form ADV, Part 1A. To the extent the SLOAs comply with certain conditions, however, including that clients have the right to terminate the SLOA, and that the qualified custodian will confirm the status of the SLOA annually directly with the client, we are not subject to a surprise custody audit of those assets.

Account Statements

Quantum provides periodic performance report statements in addition to the statements you receive from your qualified custodian. We urge clients to compare Quantum's performance reports with the account statements received from their qualified custodian.

Item 16 Investment Discretion

Discretionary Authority for Trading

We provide investment portfolio services on both a discretionary and non-discretionary basis, as identified in the Client Agreement. Our ability to exercise both discretionary and non-discretionary authority requires the execution of a limited power of attorney contained in our Client Agreement, as well as any limited power of attorney form required by the qualified custodian holding your assets.

When you grant us discretionary authority that means we execute investment transactions in your accounts without having to obtain prior approval from you.

Non-discretionary authority means we obtain permission from you prior to any trading activity in your account.

The client approves the custodian to be used and the commission rates paid to the custodian.

Item 17 Voting Client Securities

Proxy Votes

Quantum does not vote proxies on securities. Clients are expected to vote their own proxies. When assistance on voting proxies is requested, Quantum will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

Item 18 Financial Information

Financial Condition

Quantum does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Quantum does not serve as a custodian for clients' funds or securities or require prepayment of fees of more than \$1200 per client and six months or more in advance.