

**Kohlhepp Investment Advisors, Ltd.
3655 Route 202, Suite 100
Doylestown, Pennsylvania 18902**

**Phone: 215-340-5777
Fax: 215-340-5788
Web Site: www.kohlheppadvisors.com**

March 16, 2022

FORM ADV PART 2A. BROCHURE

This brochure provides information about the qualifications and business practices of Kohlhepp Investment Advisors, Ltd. If you have any questions about the contents of this brochure, please contact us at 215-340-5777. 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 Kohlhepp Investment Advisors, Ltd. is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Kohlhepp Investment Advisors, Ltd. is 113989.

Kohlhepp Investment Advisors, Ltd. is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 3: Table of Contents

<i>Advisory Business</i>	<i>1</i>
<i>Fees and Compensation</i>	<i>3</i>
<i>Performance-Based Fees and Side-By-Side Management</i>	<i>4</i>
<i>Types of Clients.....</i>	<i>4</i>
<i>Methods of Analysis, Investment Strategies and Risk of Loss</i>	<i>5</i>
<i>Disciplinary Information.....</i>	<i>7</i>
<i>Other Financial Industry Activities and Affiliations.....</i>	<i>7</i>
<i>Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....</i>	<i>8</i>
<i>Brokerage Practices</i>	<i>9</i>
<i>Review of Accounts</i>	<i>10</i>
<i>Client Referrals and Other Compensation</i>	<i>10</i>
<i>Custody.....</i>	<i>11</i>
<i>Investment Discretion.....</i>	<i>12</i>
<i>Voting Client Securities.....</i>	<i>12</i>
<i>Financial Information.....</i>	<i>12</i>

Advisory Business

Form ADV Part 2A, Item 4

Kohlhepp Investment Advisors, Ltd.'s registration was granted by the U.S. Securities and Exchange Commission on September 24, 2001. Edward John Kohlhepp, Sr. (CRD Number 273292) is Founder, CEO and Chief Compliance Officer of the firm and owns forty (40%) percent of the equity of the firm. Edward Kohlhepp, Jr. CRD Number 2814743 is President and owns forty (40%) percent of the equity of the firm and Mary Beth Kohlhepp Roche CRD Number 5229012 is Director of Operations and owns twenty (20%) percent of the equity of the firm. The firm is not publicly owned or traded. There are no indirect owners of the firm or intermediaries who have any ownership interest in the firm. The firm manages each client's portfolio on an individualized basis. Clients may impose restrictions on their accounts. The firm does not sponsor any wrap fee programs.

As of December 31, 2021, the firm managed assets on a discretionary basis in the amount of \$183,658,108 which represented 868 accounts and on a nondiscretionary basis in the amount of \$6,766,250 which represented 90 accounts. Firm provides comprehensive financial planning services to its clients.

Investment Management Services. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client, on both a discretionary and non-discretionary basis. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the client (e.g., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

Investment Advisory Services. We offer investment management services in house, or when appropriate, by retaining third-party money managers for portfolio management services. We assist clients in selecting an appropriate allocation model, and when retaining a third-party money manager, completing the third-party money manager's investor profile questionnaire if and when available, interacting with the third-party money manager and reviewing the third-party money manager. Additionally, we will meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account.

Financial Analysis. Firm provides investment advice based on an analysis of individual client's financial data. Recommendations on the sale and purchase of investments are made on an individual basis. Once investment recommendations are made, clients may contract for periodic updates. For the "Financial Analysis" approach, Firm is compensated by this advisory client on the basis of a contractual fee. The contract is subject to termination at any time by the client. Any credit balance is refundable on a pro-rata basis.

In its work with outside custodial services such as TD Ameritrade, Charles Schwab, and AssetMark Trust Co., Firm shall recommend mutual funds, ETFs, Equities, Bonds and other securities which are to be selected and used.

A fee, disclosed below at item 5, will be collected monthly or quarterly in arrears or in advance.

Some Kohlhepp Investment Advisors' affiliated persons who are also registered representatives are eligible to participate in the Cambridge Investment Group, Inc.'s "Equity Participation Plan" (EPP). Cambridge Investment Group, Inc. is 100% owner of CIRA and its affiliated broker/dealer CIR. Those from Kohlhepp Investment Advisors who participate in this program do not act as officers of Cambridge. However, once the EPP units are vested and the years of service requirement is met, they will have a right to the appreciation in value of the same number of shares of Cambridge Investment Group, Inc. stock as he or she holds in vested EPP units. This arrangement between certain Kohlhepp Investment Advisor's affiliated persons who are also registered representatives and Cambridge is a potential conflict of interest between Kohlhepp Investment Advisors and its clients in that it may inhibit Kohlhepp Investment Advisors' independent judgment concerning the best execution services offered by Cambridge and its clearing broker-dealers.

Fees and Compensation

Form ADV Part 2A, Item 5

In some of these programs, the fee is paid by the client directly to the third party manager and such manager pays Firm its share. In other programs, the client pays Firm directly. Payments may or may not be made through Cambridge.

Financial Analysis: The fee is negotiable and varies from client to client but does not exceed \$450 per hour. A deposit for the financial planning fee may be required before work will commence for the “Financial Analysis”.

On some occasions a fee based on percentage of assets comprising the financial plan will be charged. This fee will not exceed two and one-half (2.5%) percent of such assets. Assets will be considered to be the current market value of the assets on the date the contract is entered into and each respective anniversary. The minimum annual fee is \$1000. The advisory fee is payable upon entering into contract and includes such direct costs as consultation, data gathering, record keeping, analysis, set up, etc. No fee shall be payable more than six (6) months in advance.

With regard to the non-securities activity, this will involve advice including but not limited to retirement, education, insurance, tax, retirement income planning and financial planning to individuals, partnerships and corporations on a fee basis up to \$450 per hour.

Asset Management Services

Fees: Client will pay the Advisor an advisory and administrative fee for Asset Management Services every calendar quarter (the “Management Fee”). The fee shall be based upon a percentage of assets under management up to a maximum of (2.25%) percent annually, and includes the advisory fee for the third-party money manager, if one is used. The Management Fee, by default, is payable in advance on a quarterly basis and shall be debited directly from the Client’s account following the execution of the Asset Management Agreement and an exhibit page, in which the fee is described and accepted by the client. In certain cases, a client may receive an invoice in lieu of the direct debit. If invoiced fee payments have not been made within 60 days of the billing date, Kohlhepp Investment Advisors, Ltd. reserves the right to debit the account for the overdue fee. In the event the invoice is not paid in full and on time fee collection will automatically revert to the default option, direct debit. The initial fee may be prorated to cover the period from the date the account is opened through the end of the current calendar quarter. Thereafter, the Management Fee will be based upon the net worth of the account on the last business day of the preceding calendar quarter. In certain cases and under certain circumstances, Management Fees may be reduced and/or tiered by the Advisor. In such a case, an amended fee schedule shall be provided to the client. Fees may be modified at the discretion of the Advisor with at least 30 (thirty) days prior written notice. Advisor is not being compensated on the basis of a share of capital gains upon or capital appreciation of the funds or any other portion of the funds of the Client. Separate account managers, strategist and money managers shall impose additional fees. Additional program, platform and custodial fees may also be imposed.

Termination:

Either party may terminate the Asset Management Agreement at any time by providing written notice to the other party. Notwithstanding the foregoing, the Client may terminate this Agreement within five (5) business days of its signing and the Client shall be entitled to a refund of any fees paid to the Advisor before such termination date. Upon any termination of the Agreement, after the five (5) business days of its signing, the Client is entitled to a pro rata refund of any prepaid quarterly Management Fees based upon the number of days remaining in the quarter after the date upon which notice of termination is received. Termination of the Agreement does not affect liabilities or obligations incurred or arising from Asset Management Services initiated under the Agreement before such termination.

Performance-Based Fees and Side-By-Side Management

Form ADV Part 2A, Item 6

None.

Types of Clients

Form ADV Part 2A, Item 7

Individuals, High Net Worth Individuals, and ERISA Plans

The minimum investment for accounts is \$25,000. However, clients may be permitted to invest less than \$25,000 based on information provided by the client to Kohlhepp Investment Advisors, Ltd. that investing a lower amount is appropriate for the client, or the client has established additional managed accounts with the firm.

Methods of Analysis, Investment Strategies and Risk of Loss

Form ADV Part 2A, Item 8

Methods of securities analysis shall be fundamental and technical analysis.

Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Technical analysis involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may under perform other trading methods when fundamental factors dominate price moves within a given market.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

Turnover Risk: At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover may result in correspondingly greater transaction fees and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable, or find buyers at any price.

Concentration Risk: Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Liquidity Risk: The risk stemming from the lack of marketability of an investment that cannot be bought or sold quickly enough to prevent or minimize a loss.

Inflation: Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Options and other derivatives carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

Investment Companies Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which clients invest.

For clients in which we employ a third-party money manager, investment strategies and specific associated risks can be found in the Form ADV Part 2A of that third-party money manager.

Disciplinary Information

Form ADV Part 2A, Item 9

None.

Other Financial Industry Activities and Affiliations

Form ADV Part 2A, Item 10

Edward J. Kohlhepp, Sr. is a registered principal (Series 24) with Cambridge Investment Research, Inc. It is possible that as a result of this arrangement, the client may pay higher or lower commissions on the execution of a trade. All clients are always advised that they shall have total freedom to effect all securities transactions with any broker/dealer of their choice. Firm is not an affiliate of Cambridge.

Mr. Kohlhepp, through his affiliation with Cambridge Investment Research, Inc. participates in the Equity Participation Plan (EPP), which may influence his decision to be personally affiliated with Cambridge. The EPP program is a stock appreciation rights program. Once a participant's EPP's units are vested and the years of service requirement is met, the participant has a right to the appreciation in value of the same number of shares of Cambridge Investment Group Stock as he/she holds in vested

EPP's Units. Mr. Kohlhepp has entered into the EPP program but is not an owner or officer of Cambridge. He is eligible to participate due to his affiliation as a registered representative of Cambridge. This arrangement is a potential conflict of interest between Kohlhepp Investment Advisors, Ltd., and its clients.

IARs of the Advisor may be licensed to sell securities in the capacity as Registered Representatives of Cambridge Investment Research, Inc, a registered broker/dealer, member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investors Protection Corporation ("SIPC"). These individuals have the ability to buy and sell securities for which they may earn a commission. As well, IARs may be licensed life insurance agents appointed with various insurance companies and may sell insurance products to clients of the Advisor. Therefore, IARs, in the capacity as a licensed life agent, may be able to implement insurance recommendations for advisory clients electing to receive this service. In this event, advisor representatives, in their separate capacities as licensed insurance agents, will receive separate and typical commission compensation for insurance and/or annuity sales. This receipt of additional compensation creates a conflict of interest since the advisor has an incentive to recommend products and services that benefit the advisor and may not be in the best interest of the client. Advisor avoids this conflict of interest by always placing the client's needs first.

The Advisor may receive certain benefits from qualified custodial firm(s). The decision to use certain broker/dealers is based on past experiences, minimizing commissions and other costs, as well as offerings or services provided, such as online access for Advisor, Advisor's IARs and clients. Other considerations may be, but are not limited to, account custody, trade execution services, clearing services, access to information and, for a fee, electronic trade entry and account information look-up services, record keeping services, exception reporting and access to various financial products.

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

Form ADV Part 2A, Item 11

The firm has adopted a written Code of Ethics in compliance with SEC Rule 204A-1. The code sets forth standards of conduct and requires compliance with federal securities laws. Our code also addresses personal trading and requires our employees to report their personal securities holdings and transactions to the Chief Compliance Officer of the firm. A copy of our Code of Ethics is provided to any client or prospective client upon request.

Equity and principal officers may purchase securities, mutual funds, ETFs, fixed and/or variable annuities, limited partnerships, REITs, BDCs and interval funds that it recommends to clients. All clients of Firm are informed that the investment adviser and its employees may from time to time hold a position either directly or indirectly in securities and/or mutual funds that are recommended. No

person associated with the registrant may trade in a recommended security to his or her advantage over a client.

Investment Advice Relating to Retirement Accounts

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

In addition, and as required by this rule, we provide information regarding the services that we provide to you, and any material conflicts of interest, in this brochure and in your client agreement.

Brokerage Practices

Form ADV Part 2A, Item 12

Associated persons are associated with Cambridge Investment Research, Inc. and will receive commissions from their representative broker/dealers upon sale of investment products for which commissions are payable and can also receive commissions from insurance companies upon the sale of life or health insurance. In connection with Firm's consulting services, Firm receives compensation.

Clients wishing to implement the advice of the Firm's associated persons are free to select any broker they wish and are so informed. If clients wish to have the associated persons implement the advice in their capacities as registered representatives, their broker/dealer, Cambridge Investment Research, Inc. (CIR), will be used. CIR has a wide range of approved securities products for which CIR performs due diligence when selecting. CIR's registered representatives are required to adhere to these products when implementing securities transactions. The commissions earned for these products may be higher or lower than commissions earned through another broker/dealer.

In addition, some of the Firm's affiliated persons who are also registered representatives are eligible to participate in the Cambridge Investment Group, Inc.'s "Equity Participation Plan" (EPP). Cambridge

Investment Group, Inc. is 100% owner of CIRA and its affiliated broker/dealer CIR. Those from the Firm who participate in this program do not act as officers of Cambridge. However, once the EPP units are vested and the years of service requirement is met, they will have a right to the appreciation in value of the same number of shares of Cambridge Investment Group, Inc. stock as he or she holds in vested EPP units. This arrangement between certain Firm affiliated persons who are also registered representatives and Cambridge is a potential conflict of interest between the Firm and its clients in that it may inhibit the Firm's independent judgment concerning the best execution services offered by Cambridge and its clearing broker-dealers.

While the Firm has an arrangement with CIR, and the clearing broker/dealers that have contracted with CIR, at least annually, the Firm will review alternative broker/dealers and custodians in the marketplace to ensure CIR and its custodians are meeting the Firm's duty to provide best execution for client accounts. The review will include a comparison to CIR and the currently used custodians which involve evaluating criteria such as overall expertise, cost competitiveness and financial condition. The quality of execution by CIR and custodians will be reviewed through trade journal evaluations. However, best execution does not simply mean the lowest transaction cost. Therefore, no single criteria will validate nor invalidate a custodian, but rather, all criteria taken together will be used in evaluating the currently utilized custodian. The recommendation of CIR is not influenced by any soft dollar services or benefits provided to the advisor.

Review of Accounts

Form ADV Part 2A, Item 13

Reviewers include Edward J Kohlhepp, Sr., Founder & CEO and Edward J Kohlhepp, Jr., President.

Reviews are conducted at least annually. Some accounts are reviewed more frequently based upon several factors including but not limited to, a client's request, changes in a client's financial status and/or investment objectives, or if a specific market or product event warrants it. We offer electronic access to Albridge to all of our clients, which allows for access to a consolidated report of their accounts, as they so choose.

Client Referrals and Other Compensation

Form ADV Part 2A, Item 14

We do not directly or indirectly compensate any person who is not advisory personnel for client referrals. Principal executive officers also advise clients on purchase of insurance. Associated persons of Firm also engage in tax planning and provide tax advice for clients.

Custody

Form ADV Part 2A, Item 15

Kohlhepp Investment Advisors, Ltd. does not accept custody of client funds, other than debiting fees from client accounts and standing letters of authorization (described below). Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Clients are urged to carefully review such statements and compare such official custodial records to the account statements or reports that may be provide by firm. Firm statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

For client account in which Kohlhepp Investment Advisors, Ltd. directly debits their advisory fee:

- i. The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.
- ii. The client will provide written authorization to Kohlhepp, permitting them to be paid directly for their accounts held by the custodian.

Standing Letters of Authorization: Kohlhepp Investment Advisors, Ltd. does maintain a standing letter of authorization (SLOA) where the funds or securities are being sent to a third party, and the following conditions are met:

- a. The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- b. The client authorizes Kohlhepp Investment Advisors, Ltd., in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- c. The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization and provides a transfer of funds notice to the client promptly after each transfer.
- d. The client has the ability to terminate or change the instruction to the client's qualified custodian.
- e. Kohlhepp Investment Advisors, Ltd. has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- f. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.
- g. Kohlhepp Investment Advisors, Ltd. maintains records showing that the third party is not a related party of Kohlhepp Investment Advisors, Ltd. or located at the same address as Kohlhepp Investment Advisors, Ltd.

Investment Discretion

Form ADV Part 2A, Item 16

Kohlhepp Investment Advisors, Ltd. will have, in its discretion, the power and authority to supervise and direct the account investments including the authority to buy, sell, exchange, convert or otherwise trade in any security. All transactions entered on behalf of the client shall be consistent with the client's stated financial condition and investment objectives.

Voting Client Securities

Form ADV Part 2A, Item 17

Firm shall not vote proxy statements on behalf of advisory clients.

Financial Information

Form ADV Part 2A, Item 18

Firm does not have custody of client funds or securities or require or solicit prepayment of more than \$1200 in fees per client six months in advance.