

# Jackson Thornton Asset Management, LLC

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This Brochure provides information about the qualifications and business practices of Jackson Thornton Asset Management, LLC (“JTAM”). If you have any questions about the contents of this Brochure, please contact us at (334) 834-7660. 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.

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

Additional information about JTAM also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for JTAM is 116091.

## Item 2 – Material Changes

This Item of the Brochure will discuss only specific material changes that are made to the Brochure since the last annual update and provide clients with a summary of such changes. The last annual update of our Brochure was March 17, 2022.

In this update, we have:

- Updated the description of our service arrangement with Buckingham Strategic Partners in Items 4 and 5;
- Added language to describe the use of Dimensional Fund Advisors' Separately Managed Account platform in Items 4 and 5; and
- Updated our fee schedule in Item 5.

(Brochure Date: 03/06/2023)

(Date of Most Recent Annual Updating Amendment: 03/06/2023)

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

Currently, our Brochure may be requested by contacting our Chief Compliance Officer J. Adam Causey at (334) 240-3691.

Item 3 – Table of Contents

Item 1 – Cover Page.....i

Item 2 – Material Changes ..... ii

Item 3 -Table of Contents..... iii

Item 4 – Advisory Business ..... 1

Item 5 – Fees and Compensation ..... 3

Item 6 – Performance-Based Fees and Side-By-Side Management..... 5

Item 7 – Types of Clients ..... 5

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss ..... 5

Item 9 – Disciplinary Information ..... 7

Item 10 – Other Financial Industry Activities and Affiliations ..... 7

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading..... 8

Item 12 – Brokerage Practices ..... 8

Item 13 – Review of Accounts .....10

Item 14 – Client Referrals and Other Compensation.....11

Item 15 – Custody .....12

Item 16 – Investment Discretion .....12

Item 17 – Voting Client Securities .....12

Item 18 – Financial Information.....12

Brochure Supplements (provided to clients)

## **Item 4 – Advisory Business**

JTAM is owned by the accounting firm Jackson Thornton & Co., PC and has been providing advisory services since 1999.

As of December 31, 2023, JTAM managed \$1,265,492,038 on a discretionary basis and \$16,915,102 on a non-discretionary basis. JTAM also advised on \$238,388,946 of retirement plan assets including its parent company's retirement plan. Managed funds and advised funds totaled \$1,520,796,086 representing 953 client relationships.

### **Investment Management Services**

JTAM works with each client to determine the client's investment objectives and investor risk profile and will design a written investment policy statement. JTAM uses investment and portfolio allocation software to evaluate alternative portfolio designs. JTAM evaluates the client's existing investments with respect to the client's investment policy statement. JTAM works with new clients to develop a plan to transition from the client's existing portfolio to the portfolio recommended by JTAM. JTAM will then continuously monitor the client's portfolio holdings and the overall asset allocation strategy and hold review meetings with the client regarding the account as necessary.

JTAM will typically create a portfolio of no-load mutual funds and exchange traded funds ("ETFs") and may use model portfolios if the models match the client's investment policy. JTAM will allocate the client's assets among various investments taking into consideration the overall management style selected by the client. JTAM primarily recommends portfolios consisting of passively managed asset class and index mutual funds, as well as ETFs. JTAM primarily recommends mutual funds and ETFs offered by Dimensional Fund Advisors (DFA). DFA-sponsored mutual funds follow a passive asset class investment philosophy with low holdings turnover. Client portfolios may also include some individual equity securities in situations where disposition of these securities would present an overriding tax implication or the client specifically requests they be retained for a personal reason.

JTAM manages mutual fund and equity portfolios on a discretionary basis according to the investment policy selected by the client. This discretionary authority will be limited to the authority to periodically rebalance client accounts, including rebalancing as necessary to add or withdraw funds from a client's account, and to harvest tax losses. Any such discretionary rebalancing by JTAM will be done only within the asset allocation limits approved by the client in the client's investment policy statement. JTAM also provides non-discretionary investment management services to a small number of accounts. JTAM may also recommend fixed income portfolios to advisory clients, which consist of managed accounts of individual bonds. JTAM will request discretionary authority from advisory clients to manage fixed income portfolios, including the discretion to retain a third-party fixed income manager.

Pursuant to its discretionary authority, JTAM will retain an independent separate account manager ("Independent Manager") for the management of client portfolios. The Independent Manager will be

provided with the discretionary authority to invest client assets consistent with the client's Investment Policy Statement. The Independent Manager will also monitor the accounts for changes in credit ratings, security call provisions, and tax loss harvesting opportunities (to the extent that the manager is provided with cost basis information). JTAM has hired Buckingham Strategic Partners ("BSP") as the primary Independent Manager.

In certain circumstances, as determined by JTAM and the client, JTAM may engage DFA as an Independent Manager to manage portfolios of individual securities for clients. In these instances, DFA's fees are separate, distinct, and in addition to JTAM's advisory fees.

On an ongoing basis, JTAM will answer clients' inquiries regarding their accounts and review periodically with clients the performance of their accounts. JTAM will periodically, and at least annually, review each client's investment policy, risk profile and discuss the re-balancing of each client's accounts to the extent appropriate. JTAM will provide to the Independent Manager any updated client financial information or account restrictions necessary for sub-advisory services.

#### Additional Personal Financial Advice

In addition to managing the client's investment portfolio, JTAM will consult with clients on various financial areas including income and estate tax planning, business sale structures, college financing planning, retirement planning, insurance analysis, personal cash flow analysis, establishment and design of retirement plans, and trust designs, among other things. These wealth management consultations are available to all investment management clients. JTAM does not charge separately for these services and reserves the right to provide such additional services to clients as necessary and appropriate to the client's financial situation.

#### **Participant-Directed Retirement Plan Services**

JTAM also provides advisory services to participant-directed retirement plans through third-party administration services, which are online bundled service providers offering an opportunity for plan sponsors to provide their participants with daily account access, valuation, and investment education.

JTAM will analyze the plan's current investment platform and assist the plan in creating an investment policy statement defining the types of investments to be offered and the restrictions that may be imposed. JTAM will recommend investment options to achieve the plan's objectives, provide participant education meetings, and monitor the performance of the plan's investment vehicles.

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

For certain retirement plans, JTAM also works in coordination and support with BSP. Retirement plan clients will engage both JTAM and BSP. BSP will provide to the client additional discretionary investment management services and will exercise discretionary authority to select the plan investments made

available to the plans' participants by selecting and maintaining the plans' investments according to the goals and investment objectives of the plan.

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

## **Item 5 – Fees and Compensation**

In certain circumstances, all fees may be negotiable based on family relations, firm affiliations or individual circumstances.

JTAM has contracted with BSP for services including trade processing, collection of management fees, record maintenance, report preparation, marketing assistance, and research. JTAM has also contracted with BSP for certain sub-advisory services. In certain instances, JTAM pays a fee for these BSP services based on management fees paid to JTAM on accounts that use BSP services. The fee paid by JTAM to BSP varies based on the total client assets administered and/or sub advised by BSP through JTAM. These fees will not be separately charged to advisory clients are included within the advisory fees charged to clients. There may be other fees Advisor clients may pay to BSP directly under separate fee agreements.

Clients will be invoiced in advance at the beginning of each calendar quarter based upon the value (market value or fair market value in the absence of market value; client account balances on which JTAM calculates fees may vary from account custodial statements based on independent asset valuations and other accounting variances, including mechanisms for including accrued interest in account statements) of the client's account at the end of the previous quarter. New accounts are charged a prorated fee for each remaining day of the quarter. JTAM will request authority from the client to delegate discretion to trade in the client's account, and to receive quarterly payments directly from the client's account held by an independent custodian. Clients may provide written limited authorization to JTAM or its designated service provider, BSP, to withdraw fees from the account. JTAM will send to such clients an invoice showing the amount of the fee, the value of the client's assets on which the fee was based, and the specific manner in which the fee was calculated. Clients should verify the accuracy of the fee calculations in such invoices.

A client agreement may be canceled at any time, for any reason, and by either party upon receipt of thirty (30) days' written notice. Upon termination of any account with thirty (30) days' written notice, fees will be refunded pro rata to client based upon the number of days client used JTAM's services during the period.

All fees paid to JTAM for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. A client could invest in mutual funds directly, without the services of JTAM. In

that case, the client would not receive the services provided by JTAM which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. DFA funds also may not be available to the client directly. Accordingly, the client should review both the fees charged by the funds and the fees charged by JTAM to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

### **Independent Manager Fees**

As stated above in [Item 4](#), JTAM may decide (in coordination with the client) to implement DFA as an Independent Manager for the management of portfolios of individual securities. In these instances, DFA will charge its own separate and distinct fee from JTAM's advisory fees, which are noted below. Clients grant DFA authority at the client's custodian for DFA to directly debit client accounts for DFA's fee. Additionally, clients are required to sign an advisory agreement addendum with JTAM which outlines these additional fees.

### **Advisory Fees**

#### **Investment Management Services**

The annual fee for JTAM's investment management services is charged on a quarterly basis and is based on a percentage of the assets under management/advisement and typically ranges from 0.35% to 1.25% per year depending on the size and complexity of the client's accounts as well as services required, specifically negotiated fees and historically grandfathered fee schedules. Fees will typically be tiered and the fee is calculated by applying a different fee rate to each corresponding range of account balance of the portfolio.

The specific fee schedule charged by JTAM is established in a client's written agreement with JTAM.

Advisory fees shall apply to cash balances unless negotiated or agreed upon otherwise. As agreed between JTAM and Client, individual accounts for immediate family members are aggregated, and the fee is charged based on the total value of all family members' accounts.

#### **Employee Benefit Retirement Plan Services for Daily Participant-Directed Plans**

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

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

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

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

## **Item 7 – Types of Clients**

JTAM manages investment portfolios for individuals, qualified retirement plans, charitable organizations, private foundations, trusts and small businesses

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

### *Methods of Analysis and Investment Strategy*

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

Although all investments involve risk, JTAM's investment advice seeks to limit risk through broad diversification among asset classes and, as appropriate for particular clients, the investment directly in conservative fixed income securities to represent the fixed income class. JTAM's investment philosophy is designed for investors who desire a buy and hold strategy. Frequent trading of securities increases brokerage and other transaction costs that JTAM's strategy seeks to minimize.

In the implementation of investment plans, JTAM therefore primarily uses mutual funds, ETFs, and, as appropriate, portfolios of conservative fixed income securities.

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

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

JTAM receives supporting research from BSP and from other consultants, including economists affiliated with DFA. JTAM utilizes DFA mutual funds and ETFs in client portfolios.

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

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

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

#### *Risk of Loss*

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

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

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

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

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

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

## **Item 9 – Disciplinary Information**

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

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

Employees of any of the below affiliated companies may make referrals to JTAM for investment advisory services. Those employees who have acknowledged JTAM's Code of Ethics, and acknowledge the Code at least annually, will receive discretionary cash bonuses for successful advisory client referrals. Those affiliated employees are required to disclose the affiliation with JTAM at the time of making the referral.

### **Jackson Thornton & Co., P.C.**

Officers and employees of JTAM are also principals and employees of the accounting firm, Jackson Thornton & Co., P.C., which wholly owns JTAM.

Jackson Thornton & Co., P.C. (hereinafter "JT&Co.") may recommend JTAM to accounting clients in need of advisory services. JTAM may recommend JT&Co. to advisory clients in need of accounting services. Accounting services provided by JT&Co. are separate and distinct from the advisory services of JTAM and are provided for separate and typical compensation.

### **Affiliated Third Party Benefits Consultant**

Jackson Thornton Benefit Resources, LLC (JTBR) is an employee benefits consultant owned by the accounting firm JT&Co., which also owns JTAM.

JTBR provides plan design and compliance services to its clients. These services are billed for a flat rate or a percentage of plan assets separately from advisory fees charged by JTAM. JTBR may provide services to clients of JTAM.

JTAM and JTBR may deliver reports regarding covering each company's services to clients who have elected to contract with both affiliated companies.

## **Buckingham Strategic Partners**

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

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

JTAM has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. JTAM's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients and sets forth JTAM's practice of supervising the personal securities transactions of employees with access to client information. Individuals associated with JTAM may buy or sell securities for their personal accounts identical or different than those recommended to clients. It is the expressed policy of JTAM that no person employed by the firm shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on investment decisions of advisory clients.

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

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

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

## **Item 12 – Brokerage Practices**

JTAM arranges for the execution of securities transactions with the assistance of BSP. Through BSP, JTAM may participate in the Schwab Advisor Services ("SAS") program offered to independent investment

advisors by Charles Schwab & Company, Inc., and the Fidelity Institutional Wealth Services ("FIWS") program, sponsored by Fidelity Brokerage Services, LLC ("Fidelity"). Schwab and Fidelity are unaffiliated SEC-registered broker dealers and FINRA-member broker dealers. Each offer to independent advisors services which include custody of securities, trade execution, clearance and settlement transactions.

Additionally, JTAM offers a cash management aggregator system named Flourish Cash. Flourish Cash is a service offered by an unaffiliated third-party, Stone Ridge Securities, LLC, a registered broker-dealer and FINRA member. A Flourish Cash account is a brokerage account whereby the cash balance is swept from the brokerage account to deposit accounts at one or more third-party banks that have agreed to accept deposits from customers of Stone Ridge Securities, LLC. Stone Ridge Securities LLC is an indirect, wholly owned subsidiary of Massachusetts Mutual Life Insurance Company. Please refer to the applicable disclosures provided separately by Stone Ridge Securities upon account opening.

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

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

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

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

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

When trading client accounts, errors may periodically occur. JTAM does not maintain any client trade error gains. JTAM makes client whole with respect to any trade error losses incurred by client and caused by JTAM.

JTAM generally does not aggregate client transactions. Client accounts are individually reviewed and managed, and transaction costs are not saved by aggregating orders in almost all circumstances in which JTAM arranges transactions. BSP, in the management of portfolios, will aggregate certain transactions among client accounts that it manages, in which case a JTAM client's orders may be aggregated with an order for another client of BSP who is not a JTAM client. See BSP's Form ADV Part 2.

### **Participant-Directed Retirement Plan Services**

JTAM does not arrange for the execution of securities transactions for participant-directed retirement plans. Transactions are executed directly through employee plan participation and a third party administrator/custodian.

## **Item 13 – Review of Accounts**

### **Investment Management Services**

#### **Reviews:**

Account assets are supervised continuously and reviewed quarterly by an account representative. The review process contains each of the following elements:

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

Rebalancing may occur on an annual or more frequent basis or to adjust for additions and withdrawals to accounts made by clients.

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

- a. a specific client request;
- b. a change in client goals and objectives;
- c. an imbalance in a portfolio asset allocation;
- d. market/economic conditions; and
- e. conditions that may create tax loss harvesting opportunities.

For client portfolios managed by an Independent Manager, certain account review responsibilities are delegated to the Independent Manager, as described above in [Item 4](#).

## **Participant-Directed Retirement Plan Services:**

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

### **Reports:**

All clients other than those utilizing participant-directed daily retirement plan services will receive quarterly performance reports, prepared by BSP and reviewed by JTAM, that summarize the client's account and asset allocation. Clients will also receive statements from qualified account custodians. Plan sponsors and plan participants of participant-directed daily retirement plans will receive quarterly and annual reports regarding investment performance from BSP and/or JTAM.

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

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

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

These services benefit JTAM but may not benefit its clients' accounts. Many of the products and services assist JTAM in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of JTAM's fees from its clients' accounts, and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of JTAM's accounts. Recommended brokers also make available to JTAM other services intended to help JTAM manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. JTAM does not, however, enter into any commitments with the brokers for transaction levels in exchange for any services or products from brokers. While as a fiduciary, JTAM endeavors to act in its clients' best interests, JTAM's requirement that clients maintain their assets in accounts at Schwab or Fidelity may be based in part on the benefit to JTAM of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the brokers, which may create a potential conflict of interest.

JTAM also receives software from DFA, which JTAM utilizes in forming asset allocation strategies and producing performance reports. DFA, through a web-based service, provides referrals of investor clients

to JTAM. DFA makes such referrals to many investment advisors based on the geographic location of the prospective client. DFA also provides continuing education for JTAM personnel. These services are designed to assist JTAM plan and design its services for business growth.

## **Item 15 – Custody**

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

## **Item 16 – Investment Discretion**

JTAM manages mutual fund and equity portfolios on a discretionary or nondiscretionary basis according to the investment policy selected by the client. Discretionary authority will be limited to the authority to periodically rebalance client accounts, including rebalancing as necessary to add or withdraw funds from a client's account and to harvest tax losses. Any such discretionary rebalancing by JTAM will be done only within the asset allocation limits and specific investments approved by the client in the client's investment policy statement.

Any further limitations on this discretionary authority shall be included in this written authority statement. Clients may change/amend these limitations as required. Such amendments shall be submitted in writing.

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

As a matter of policy and practice, JTAM will not vote nor will it have any authority to vote proxies for client accounts. Clients will receive applicable proxies directly from the issuer of securities held in clients' investment portfolios. Clients will retain proxy voting responsibility for their own accounts.

## **Item 18 – Financial Information**

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