



**Firm Disclosure Brochure**

Form ADV Part 2A

*March 24, 2023*

**Archetype Advisors, LLC**

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This brochure provides information about the qualifications and business practices of Archetype Advisors, LLC ("Archetype" or the "Firm"). If you have any questions about the contents of this brochure, please contact Jennifer Estelle at (888) 975-7526. The information in this brochure has not been approved or verified by the U.S. Securities and Exchange Commission or by any state securities authority. Additional information about Archetype is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Archetype is an independent registered investment adviser. Registration does not imply any level of skill or training.

## **Item 2. Materials Changes**

In this Item, the Firm is required to discuss any material changes that have occurred since its last annual amendment. Archetype transitioned to federal investment adviser registration in March 2021 and, as such, this is the first annual amendment to the Form ADV filed with the SEC. Nevertheless, there are no material changes to report since last year's filing.

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#### **Item 4. Advisory Business**

Archetype is an investment advisory boutique, guided by its mission to create a highly personalized client experience, whereby it fosters client relationships and undertakes a largely consultative approach to identify its client's investment goals and objectives. Using forensic examination of cash flows, risk and assets, Archetype seeks not only to identify opportunities, but also to tailor expert solutions through the use of professional financial planning processes and algorithmic modeling.

Archetype has been in business since November 2011 as a registered investment adviser, providing comprehensive financial planning, investment and wealth management services. William J. Lahr, IV, CFP® is the sole member of Lahr, LLC, which owns substantially all of Archetype. As of the date of this brochure, the Firm had approximately \$129,146,490 in assets under management, all of which was managed on a discretionary basis.

Prior to engaging Archetype to provide any of the foregoing investment advisory services, the client is required to enter a written agreement with Archetype setting forth the terms and conditions under which Archetype renders its services (the "Agreement"). Per applicable regulation, if copies of the brochure documents are not provided at least 48 hours prior to the signing of the Agreement, the client has five business days in which to cancel without penalty. While this brochure generally describes the business of Archetype, certain sections also describe the activities of the Firm's Supervised Persons, which include any of Archetype's officers, partners, directors (or other persons occupying a similar status or performing similar functions), or employees, or any other person who provides investment advice on Archetype's behalf and is subject to Archetype's supervision or control.

#### **Financial Planning & Consulting Services**

##### *General Planning Services*

Archetype provides clients with a broad range of comprehensive financial planning services, which may include a variety of in-depth tax and non-investment related matters. At Archetype, the central tenant to the Firm's planning services is the process, rather than the product.

In performing its planning and consulting services, Archetype is not required to verify any information received from the client or from the client's other professionals (e.g., attorney, accountant, etc.) and is expressly authorized to rely on such information. Archetype may recommend the services of itself, and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists if Archetype recommends its own services. The client is under no obligation to act upon any of the recommendations made by Archetype under such an engagement or to engage the services of any such recommended professional, including Archetype itself. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any of Archetype's recommendations.

Clients are advised that it remains their responsibility to promptly notify Archetype if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising Archetype's previous recommendations and/or services. In conjunction with its financial planning services, Archetype manages all or a portion of its clients' assets on a discretionary basis, as part of its wealth management program.

##### *Yacht Advisory Planning Consulting*

Archetype provides consultative services to prospective yacht owners designed to educate them about various aspects related to the business and investment of yacht ownership, such as cash flow analysis, tax

strategies, financing facilities, risk measurement, succession and exit planning, marketing, management, financial oversight, insurance, and general business coaching. These services are not investment advisory related; however, they are still offered through Archetype.

### Investment Management Services

Archetype provides investment management services on a discretionary basis in separately managed account format.

Archetype primarily allocates clients' investment management assets amongst relatively low-cost exchange-traded funds ("ETFs") in accordance with the investment objectives of the client. Archetype may also provide advice and/or manage other types of securities held in clients' portfolios, such as restricted or concentrated stock positions, legacy holdings, private investments, etc.

As a convenience to clients, Archetype may also render non-discretionary investment advisory services to clients relative to variable life/annuity products that they may own, their individual employer-sponsored retirement plans, and/or 529 plans or other products that may not be held by the client's primary custodian. In so doing, Archetype either directs or recommends the allocation of client assets among the various investment options that are available with the product. Client assets are maintained at the specific insurance company or custodian designated by the product's sponsor.

Archetype tailors its advisory services to the individual needs of its clients and ensures that each investment is suitable in light of their specific profile. Clients may impose reasonable mandates or restrictions on the management of their accounts if, in the Firm's sole discretion, such conditions would not adversely impact, or provide overly burdensome to, Archetype's portfolio strategy. For comprehensive wealth management clients, in order to keep apprised of any developments to its clients' financial situations, Archetype strives to mandate that each client's financial plan is revisited on at least an annual basis, as further discussed in Item 13. Archetype employs this policy as part a concerted effort to ensure the viability of every financial plan, and corresponding investment strategy, on an ongoing basis.

Clients are advised to promptly notify Archetype if there are changes in their financial situation or investment objectives or if they wish to impose any reasonable restrictions upon Archetype's management services. Clients may impose reasonable restrictions on the management of their account if, in Archetype's sole discretion, it determines that such restrictions would not materially impact the performance of a portfolio strategy or prove overly burdensome to its management efforts.

### Sponsor of Wrap Fee Program

Archetype is the sponsor of the Archetype Wealth Management Program (the "Program"), a wrap fee program. In the event the client participates in the Program, Archetype provides advisory services and arranges for brokerage transactions under a single annualized fee, which is paid directly to Archetype. Participants in the Program may pay a higher aggregate fee than if investment management and brokerage services are purchased separately.

A complete description of the Program's terms and conditions (including fees) are contained in the Wrap Fee Program Brochure, which appears as Part 2A Appendix 1 of Archetype's Form ADV (the "Wrap Brochure"). Archetype renders substantially all of its investment management services on a wrap fee basis. Such clients are furnished with the Firm's Wrap Brochure prior to or concurrent with their engagement with Archetype.

## **Item 5. Fees and Compensation**

### Financial Planning and Consulting Fees

Certain financial planning and consulting services, including those pertaining to yacht advisory planning, are provided on a fixed fee basis. These fees are individually negotiated and determined by the specific scope of a proposed engagement. Fees may be either be itemized and paid upon completion of each individual phase/task or grouped together with a portion paid upfront and a portion paid at another agreed upon intervals. For ongoing, annualized engagements, fees may be charged in advance or in arrears, monthly, quarterly or semiannually.

### Investment and Wealth Management Fees

Archetype offers its wealth management services on a fee basis, as it does investment management only services. Management fees are charged quarterly in advance and calculated using the daily average balance during the prior billing period.

Archetype offers its comprehensive wealth management services and investment management only services through the Program to clients for an annual fee based upon the amount of the assets under its management. The Program's fee of up to two percent (2%) fee is inclusive of all financial planning , brokerage commissions, transaction fees, and other related costs, as explained in depth in the Wrap Brochure.

### Fee Discretion

Archetype may, in its sole discretion, negotiate to discount or waive certain fees based upon certain criteria (e.g., investment only accounts, anticipated future earnings, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, preexisting client relationship, account retention, etc.).

### Fees Charged by Financial Institutions

As further discussed in response to Item 12 (below), Archetype generally recommends that clients utilize the brokerage and clearing services of Pershing, LLC through Pershing Investment Manager Services ("Pershing") for investment accounts.

Archetype may only implement its investment management recommendations after the client has arranged for and furnished Archetype with all information and authorization regarding accounts with appropriate financial institutions. Financial institutions include, but are not limited to, Pershing, any other broker-dealer recommended by Archetype, broker-dealer directed by the client, trust companies, banks etc. (collectively referred to herein as the "Financial Institutions").

Clients may incur certain charges imposed by the Financial Institutions and other third parties such as charges imposed directly by a mutual fund or ETF in the account, which are disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

### Fee Debit

Archetype is generally authorized to directly debit a client's account for payment of its advisory fees. Any Financial Institutions recommended by Archetype have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid

directly to Archetype. Archetype also sends clients a written invoice itemizing the fee, including the formula used to calculate the fee, the time period covered, and the amount of assets under management on which the fee was based.

#### Fees for Management During Partial Quarters of Service

For the initial period of an engagement, the fees are calculated on a pro rata basis. The Agreement between Archetype and the client will continue in effect until terminated by either party pursuant to the terms of the Agreement. Archetype's fees are prorated through the date of termination and any remaining balance is charged or refunded to the client, as appropriate.

Clients may make additions to and withdrawals from their account at any time, subject to Archetype's right to terminate an account. Additions may be in cash or securities provided that Archetype reserves the right to liquidate any transferred securities or decline to accept particular securities into a client's account. Clients may withdraw account assets on notice to Archetype, subject to the usual and customary securities settlement procedures. Archetype may consult with its clients about the options and ramifications of transferring securities. However, clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e., contingent deferred sales charge) and/or tax ramifications.

Since Archetype's management fees are based on daily average account balance, if assets are deposited into or withdrawn from an account after the inception of a quarter, the fee payable with respect to such assets is adjusted accordingly.

#### Commissions or Sales Charges for Recommendations of Securities

The Firm does not receive any commissions or transaction fees associated with its investment management services. No Supervised Persons of Archetype are registered representatives of a broker/dealer.

### **Item 6. Performance-Based Fees and Side-by-Side Management**

Archetype does not provide services under a performance-based fee arrangement and therefore does not engage in side-by-side management of accounts with different fee structures.

### **Item 7. Types of Clients**

Archetype provides its services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations and business entities. Archetype generally seeks to impose a minimum annual fee of \$6,000.

These account requirements may have the effect of making Archetype's services cost prohibitive for certain clients. Archetype, in its sole discretion, may waive these stated fee minimums based upon certain criteria including anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, and pro bono activities.

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

## Methods of Analysis

Archetype's methodology focuses on analyzing the suitability of an investment opportunity pursuant to each client's profile, which address the following client specific considerations, without limitation: investment objectives, time horizon, risk tolerance, cash flows, distributions, and tax ramifications. Archetype utilizes a series of proprietary "screens," made up of both deterministic and stochastic modeling techniques, to assess an investment's risk level, financial condition and track record, relative to its respective asset class. The Firm relies on these metrics to determine which investment vehicles to employ in order to effect a strategy that aligns with the characteristics of a corresponding financial plan.

## Wealth Management Strategy

Archetype's comprehensive, multi-faceted approach to wealth management is defined by the "EGPRIM" process, whereby Archetype endeavors to:

- Establish an open dialogue and engage a client in a relationship;
- Gather all pertinent information and endeavor to identify and understand a client's situation;
- Process client data and compute a corresponding financial plan;
- Recommend a suitable financial strategy plan, and engage in a holistic review in order to achieve an in-depth understanding of the plan's breadth;
- Implement the plan through the use of an Archetype advisor or outside account manager; and
- Monitor the planning activity on an ongoing basis in order to stay current with all changes to a client's situations, as well as the economic and legislative tides.

Archetype believes that the segregation of wealth management services is a value-added proposition, which ensures that the financial planning process, investment strategy implementation, account custody services, reporting operations and compliance solutions operate largely independent from one another. It is in this "horizontal advice model" that Archetype seeks to establish a multi-tiered set of checks and balances.

Clients are generally first fitted with a highly customized, comprehensive financial plan. This plan addresses all areas of concern with regard to a client's finances, including insurance needs, lending facilities, income requirements, tax strategizing, estate structuring, and retirement planning, amongst others. This plan also acts as a blueprint for the management of the client's portfolio. In short, it is through this process that Archetype seeks to ensure that only those products and solutions that are suitable, in light of each client's individual situation and objectives, are utilized in the management of their account. Archetype strives to make certain that its professionals remain cognizant and knowledgeable of any developments to its clients' personal and financial situation.

## Risks of Loss

Investing involves risk, including the potential loss of principal, and past performance may not be indicative of future results. The profitability of Archetype's implementation efforts may depend to a great extent upon certain of the Firm's assessments pertaining to median average performance of asset classes, investment types, and/or risk grades, which are used to calculate future cash flows and goal achievement. There can be no assurance that the assumptions underlying Archetype's investment decisions will prove effective in achieving the objectives set forth in a client's financial plan.

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains,



as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed-based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

#### **Item 9. Disciplinary Information**

Archetype has not been involved in any legal or disciplinary event that is material to a client's evaluation of its advisory business or the integrity of management.

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

Archetype operates on a fee basis and does not sell products to its advisory clients. Certain of the Firm's Supervised Persons maintain insurance licenses; however, Archetype generally does not permit them to offer commissionable insurance products to advisory clients. Further, Archetype's Principal, William J. Lahr, IV, CFP®, in his individual capacity, may provide institutional consulting services through an affiliated of the Firm, Forte. These services may include marketing, branding, organizational structuring and other similarly related consultative functions. Archetype does not receive any portion of these fees. A conflict of interest exists to the extent that Archetype recommends these institutional consulting services and Mr. Lahr receives additional compensation as a result. Archetype has policies in place to ensure that any such recommendations are provided in the best interest of the client.

#### **Item 11. Code of Ethics**

Archetype and persons associated with Archetype ("Associated Persons") are permitted to buy or sell securities that it also recommends to clients consistent with Archetype's policies and procedures. Archetype has adopted a code of ethics that sets forth the standards of conduct expected of its associated persons and requires compliance with applicable securities laws ("Code of Ethics"). The Code of Ethics contains written policies reasonably designed to prevent the unlawful use of material non-public information by Archetype or any of its associated persons. The Code of Ethics also requires that certain of

Archetype's personnel (called "Access Persons") report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings.

Unless specifically permitted in Archetype's Code of Ethics, none of Archetype's Access Persons may effect for themselves or for their immediate family (i.e., spouse, minor children, and adults living in the same household as the Access Person) any transactions in a security which is being actively purchased or sold, or is being considered for purchase or sale, on behalf of any of Archetype's clients.

When Archetype is purchasing or considering for purchase any security on behalf of a client, no Access Person may effect a transaction in that security prior to the completion of the purchase or until a decision has been made not to purchase such security. Similarly, when Archetype is selling or considering the sale of any security on behalf of a client, no Access Person may effect a transaction in that security prior to the completion of the sale or until a decision has been made not to sell such security. These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

Clients and prospective clients may contact Archetype to request a copy of its Code of Ethics.

## **Item 12. Brokerage Practices**

As discussed in Item 5, Archetype generally recommends that clients utilize the custody, brokerage and clearing services of Pershing. Factors which Archetype considers in recommending Pershing or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. The commissions and/or transaction fees charged by Pershing may be higher or lower than those charged by other Financial Institutions.

The commissions paid by Archetype's clients comply with Archetype's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction where Archetype determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Archetype seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

Transactions may be cleared through other Financial Institutions with whom Archetype and the Financial Institutions have entered into agreements for prime brokerage clearing services. Archetype periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to obtain best execution.

The client may direct Archetype in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution, and Archetype will not seek better execution services or prices from other Financial Institutions or be able to "batch" client transactions for execution through other Financial Institutions with orders for other accounts managed by Archetype (as described below). As a result, the

client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, Archetype may decline a client's request to direct brokerage if, in Archetype's sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Transactions for each client generally will be effected independently, unless Archetype decides to purchase or sell the same securities for several clients at approximately the same time. Archetype may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among Archetype's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among Archetype's clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that Archetype determines to aggregate client orders for the purchase or sale of securities, including securities in which Archetype's Supervised Persons may invest, Archetype shall generally do so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. Archetype shall not receive any additional compensation or remuneration as a result of the aggregation. In the event that Archetype determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, Archetype may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker-dealers in return for investment research products and/or services which assist Archetype in its investment decision-making process. Such research generally will be used to service all of Archetype's clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because Archetype does not have to produce or pay for the products or services.

#### Software and Support Provided by Financial Institutions

Archetype has arrangements in place whereby the Firm receives an economic benefit from a third-party for providing investment advice to clients participating in the Program.

Specifically, Archetype may receive from Pershing certain computer software and related systems support which allow the Firm to better monitor client accounts maintained at Pershing. Archetype may receive the software and related support without cost because Archetype renders investment management services to clients that maintain assets at Pershing. The software and related systems support may benefit Archetype,

but not its clients directly. Additionally, Archetype may receive the following benefits from Pershing through its Pershing Advisor Solutions Division:

- Receipt of duplicate client confirmations and bundled duplicate statements;
- Access to a trading desk that exclusively services its Pershing Advisor Solutions participants;
- Access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and
- Access to an electronic communication network for client order entry and account information.

In fulfilling its duties to its clients, Archetype endeavors at all times to put the interests of its clients first. Clients should be aware, however, that Archetype's receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence Archetype's choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support or services.

## **Item 13. Review of Accounts**

### Account Reviews

Archetype monitors the portfolios of its wealth management and investment clients as part of a continuous and ongoing process, while regular account reviews are conducted on at least a quarterly basis. Archetype, and the outside financial planning professionals in which it engages, generally seek to require that each wealth management client's financial plan is revisited at least annually. Such financial plan reviews may also be triggered by certain legislation or the occurrence of a specified life event, which would have a material impact on the feasibility of a client's financial plan and corresponding investment strategy. These reviews are conducted by one of Archetype's investment adviser representatives, in conjunction with the financial planning professional engaged to construct the client's plan. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with Archetype and to keep Archetype informed of any changes thereto.

### Account Statements and General Reports

Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions where their accounts are custodied. Clients may also receive quarterly reports from Archetype that may include relevant account and/or market-related information, such as an inventory of account holdings and account performance. Clients should compare the account statements they receive from their custodian with those they receive from Archetype.

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

### Economic Benefits

Archetype is required to disclose any relationship or arrangement where it receives an economic benefit from a third party (non-client) for providing advisory services. Archetype may receive economic benefits from non-clients for providing advice or other advisory services to clients. This type of relationship poses a conflict of interest and any such relationship is disclosed in response to Item 12.

### Client Referrals

Archetype is required to disclose any direct or indirect compensation that it provides for client referrals. Archetype does not compensate for referrals.

### **Item 15. Custody**

Certain clients provide Archetype with the ability to invoice their custodian for payment of the Firm's advisory fees, which results in a form of constructive custody. As referenced in Item 5, the Firm sends clients an itemized invoice detailing their fee calculation in accordance with applicable regulation and the Financial Institutions where client accounts are custodied have agreed to send statements to clients, at least quarterly, indicating all amounts disbursed from their accounts, including the amount of advisory fees paid directly to Archetype. In addition, as discussed in Item 13, Archetype also sends periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the Financial Institutions and compare them to those received from Archetype.

### **Item 16. Investment Discretion**

Archetype retains the authority to exercise discretion on behalf of clients. Archetype is considered to exercise investment discretion over a client's account if it can effect transactions for the client without first having to seek the client's consent. Archetype is given this authority through a limited power-of-attorney included in the Agreement between Archetype and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). Archetype assumes discretion over the security selection process, including the amount, time and price at which transaction are executed.

### **Item 17. Voting Client Securities**

Archetype does not accept the authority to vote clients' securities (i.e., proxies) on their behalves. Clients receive proxies directly from the Financial Institutions where their assets are custodied and may contact the Firm at the number on the cover of this brochure with questions about proxies and/or other such solicitations.

### **Item 18. Financial Information**

Archetype is not required to disclose any financial information pursuant to this Item due to the following:

- The Firm does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance;
- The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.