

## **Form ADV: Part 2 A & B**

As of February 28<sup>th</sup>, 2023

**Part 2A: The Brochure:** This brochure discloses information about the qualifications and business practices of the investment advisory firm named below for the benefit of its clients and prospective clients. Please note that the terms “registered investment adviser” or “registered” do not imply a certain level of skill or training. If the adviser uses a wrap fee program, it is found in Appendix 1. If you have any questions about the contents of this brochure, please contact us at the contacts given below.

**Part 2B: The “Brochure Supplement”** follows and discloses information about persons providing advice.

2A Brochure: Item 1: Cover Page for

### **T. Anton Investment House, Inc.**

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or

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*Please note that this brochure has not been approved by the Securities & Exchange Commission or by any state securities authority. This firm is registered with the Securities & Exchange Commission; **registration does not mean approval or verification by those regulators.** Interested persons may find more information about the firm at Investment Adviser Public Disclosure: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

**2A: Brochure: Item 2: Material Changes:** *If we amend this disclosure brochure, we are to send you either a new copy of the brochure or at least this item 2 describing the changes made so you can decide if you want us to send you a complete, new copy. A summary of material changes is :*

☐ attached as an exhibit to or

☒ included here as part of this updated brochure

The changes made are:

- The amended version for February 28<sup>th</sup>, 2023, outlines the firm’s fiduciary duties when recommending a rollover of assets to the firm.

**2A: Brochure: Item 3: Table of Contents:** Information that investment advisers must provide to prospective clients initially and to existing clients annually: 19 disclosure items that describe this firm’s advisory business

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### Item 4.: This advisory firm's business

**4. A** T. Anton Investment House (or the “firm” or “the adviser”) is a Wisconsin corporation [IRS EIN 47-2881564] that is registered with the Securities & Exchange Commission. Note: The use of the phrase “registered investment adviser” or the term “registered” do not imply a certain level of skill or training.

Tracey C. Anton is the firm’s sole owner (from 01-22-2015), its President and investment advisory representative. [Please see the form 2B at the end of this disclosure brochure.]

Normal business hours are 8:30 am to 5:00 pm, Monday through Thursday, 8:30 am to 3:00 pm Friday.

**4. B** The firm offers the following services:

- Financial Planning
- Portfolio Management for individuals and businesses

The firm requires all clients or accounts to enter into a written advisory agreement prior to establishing an advisory relationship with T. Anton Investment House, Inc. Either party may at any time terminate the agreement by means of written notice to the other party.

#### Financial Plans

Because each client’s financial situation and goals change, T. Anton Investment House, Inc. encourages its clients to have their financial situation examined at least annually, more frequently if material changes occur. T. Anton Investment House provides comprehensive financial planning services to evaluate:

- |                      |  |
|----------------------|--|
| • securities,        | • retirement planning,   |
| • taxes,             | • personal investments,  |
| • estate planning,   | • financing options,   |
| • insurance,         | • cash flow,   |
| • business planning, | • company benefits and any other financial aspects of their lives. |

The adviser may present a generated plan to show the client’s current situation, goals, and objectives and various alternatives designed to assist in attaining the stated goals, or the presentation may be mostly verbal with some notes. Before an advisory representative provides investment advice, she will ask the client to provide this firm with information about the client’s income, tax situation, risk tolerance, time frame, assets and amount and type of insurance coverage in effect. The adviser then analyzes the information in relation to the client’s expressed investment objectives and the client’s needs.

The adviser will hold one or more meetings with the client to discuss the status of the client’s financial situation and the adviser’s specific recommendations to achieve the client’s objectives.

T. Anton Investment House, Inc. will furnish investment advice about securities and other assets of a client after meeting with the client to discuss the client’s specific financial situation and short and long-term investment goals. Advice may be verbal, provided during meetings with a client, or in written reports summarizing the client’s financial affairs and the firm’s recommendations. If the client agrees to the adviser’s investment recommendations, such as asset allocation, T. Anton Investment House, Inc. will implement said investment strategy. At least annually, T. Anton Investment House, Inc. will provide the client with reports showing portfolio performance. Additionally, T. Anton Investment House, Inc. may provide the client with reports reflecting a financial plan, if said financial plan was discussed during a meeting with the client. Although T. Anton Investment House, Inc. will make efforts to

communicate with the client, it is important that the client communicates any changes that might affect your investment strategy and financial plan.

T. Anton Investment House, Inc. does not provide in depth budgeting services or review of casualty insurance. Examples of casualty insurance would include homeowners, auto, liability insurance, etc. These areas should be reviewed by an outside firm specializing in casualty insurance.

#### 4.B. Portfolio Advice and Management

T. Anton Investment House, Inc. offers investment management services where it is appointed as the investment advisor with discretionary trading authorization. T. Anton Investment House provides continuous advice to investment advisory accounts as set forth in the advisory agreement between the firm and the client. Management services include management of most forms of investments, including common and preferred stocks, bonds, municipal securities and mutual funds.

T. Anton Investment House, Inc. uses discretionary authority in placing trade orders for each client's account, based on what the parameters agreed upon with the client. The client gives discretionary authorization to the advisor by entering into a written advisory agreement and a trading authorization document through the current custodian. Discretion allows the advisor to make investment decisions without requiring the client to pre-authorize every trade. Examples of when discretionary authority would be used include (i) determining the holding(s) to sell when the account's cash amount will not cover the client's requested withdrawal or advisory fee, (ii) determining what investments to buy when the client contributes money to their account.

T. Anton Investment House, Inc. has developed proprietary investment models. The firm bases the client's model assignment on client objectives, risk tolerance, distribution frequency, time horizon, tax sensitivities, and account value.

T. Anton Investment House, Inc. proprietary models are as follows:

- "High Growth 100%" - 100% equities
- "Growth 90/10" - 90% equities & 10% Fixed Income
- "Moderate Growth 80/20" - 80% Equities & 20% Fixed Income
- "Growth and Income 70/30" - 70% Equities & 30% Fixed Income
- "Balanced 60/40" - 60% Equities & 40% Fixed Income
- "Conservative Balanced 50/50" - 50% Equities & 50% Bonds

All models are the creation of T. Anton Investment House, Inc. and use our standard fee schedule stated in 5A, below.

#### **Retirement Plan Rollover Recommendations**

When we provide investment advice about your retirement plan account or individual retirement account ("IRA") including whether to maintain investments and/or proceeds in the retirement plan account roll over such investments from the retirement plan account to an IRA or make a distribution from the retirement plan account, we acknowledge that the firm is a "fiduciary" within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code as applicable. The way that the firm makes money creates conflicts with your interests so the firm operates under a special rule that requires that firm to act in your best interest and not put our interests ahead of yours.

Under this special rule's provisions, the firm must act as a fiduciary to a retirement plan account or IRA under ERISA/the Internal Revenue Code by:

- Brokerage commissions
- Custodian fees
- Postage charges
- Processing charges
- Ticket charges
- Early surrender fees
- Transfer fees
- Administrative fees for investments in mutual funds;
- Account maintenance fees charged by a broker dealer for an account, especially if inactive;
- Third party administrator ("TPA") and record keeping fees
- Meeting a professional standard of care when making investment recommendations (i.e., give prudent advice);
- Never putting the interests of the firm ahead of you when making recommendations (i.e., give loyal advice);
- Avoiding misleading statements about conflicts of interest, fees, and investments;
- Following policies and procedures designed to ensure that the firm gives advice that is in your best interest;
- Charging no more than is reasonable for the services of the firm; and
- Giving you basic information about any conflicts of interest.

To the extent that we recommend that you roll over your account to an account managed by the firm, please know that the firm and its investment advisor representatives have an inherent conflict of interest. Increased investment advisory fees may be earned by recommending that you roll over your account to an account managed by the firm. We will earn fewer investment advisory fees if you do not roll over the funds to an account managed by the firm. Thus, our investment advisor representatives have an economic incentive to recommend a rollover of funds to an account managed by the firm which is a conflict of interest because our recommendation that you open the account to be managed by the firm can be based on our economic incentive and not based exclusively on whether or not moving the funds is in your overall best interest.

We have taken steps to manage this conflict of interest. We have adopted an impartial conduct standard whereby our investment adviser representatives will (i) provide investment advice to a retirement plan participant regarding a rollover of funds from the retirement plan in accordance with the fiduciary status described below, (ii) not recommend investments which result in the firm receiving unreasonable compensation related to the rollover of funds, and (iii) fully disclose compensation received by the firm and our supervised persons and any material conflicts of interest related to recommending the rollover of funds and refrain from making any materially misleading statements regarding such rollover.

When providing advice to you regarding a rollover, our investment adviser representatives will act with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims, based on the investment objectives, risk, tolerance, financial circumstances, and a client's needs, without regard to the financial or other interests of the firm or our affiliated personnel.

In addition to these commissions/fees, opening an investment account carries with it costs beyond the advisory fee(s) the firm charges. When placing a transaction order to buy or sell securities, advisory clients may have to pay any or all of the following charges in addition to the advisory fees charged by this firm:

4.C. Do we tailor our advisory services to a client's individual needs and how do we do so? Can clients impose restrictions on investing in certain securities or types of securities?

By their nature, financial plans must be based on each client's individual needs to have any useful validity. As a fiduciary, an investment adviser is to make only those recommendations that demonstrably are in the client's own best interests, which means that they, too, must be based on an individual's stated and/ or established, individual needs, goals, risk tolerance and investment time horizon.

The firm seeks to establish this personal dimension through a careful, fact-finding interview and discussions with each client. Clients may impose reasonable restrictions on the adviser's discretion to invest in certain securities or types of securities if a client provides clear, written directions to that effect. The client allows the power of discretion to an adviser by means of a limited trading authority, which the client may revoke at any time.

4.D. T. Anton Investment House does not sponsor or manage any wrap fee program. The adviser does not recommend any third party programs or platforms or outside management.

4.E. As of December 31, 2022 this firm managed \$235,079,119.

Item 5.: Fees and Compensation — How our firm is compensated

5.A. A description of the range of fees.

Are our fees negotiable? Investment management service fees are negotiable at the adviser's sole discretion, based on facts such as prior relationship or expected future additions to an account.

#### Financial Plans

T. Anton Investment House charges no fee for its basic financial plan.

#### Investment Advisory and Management Services

T. Anton Investment House charges a fee for continuous advice as a percentage of the assets under management. Management fees are the same using our proprietary models. The fee schedule is:

1.00% on the first \$1,000,000 under management  
0.80% on the next \$1 million  
0.60% on amounts over \$2 million.

5.B. Disclosure: Our firm bills its clients for the incurred advisory fees by:

- Obtaining each client's signed permission to deduct the advisory fees from the client's account held by the custodian.

The firm bills quarterly. T. Anton Investment House, Inc. uses "direct billing" that requires us to obtain a client's written permission to deduct our fees directly from the client's account held by the custodian.

5.C. Disclosure: Other types of fees or expenses clients may pay in connection with the advisory services.

Clients should be aware that opening an investment account carries with it costs beyond the advisory fee(s) T. Anton Investment House charges. When placing a transaction order to buy or sell securities, advisory clients may have to pay any or all of the following charges in addition to the advisory fees charged by this firm.

- transfer fees
- administrative and management fees for investments in mutual funds and exchange-traded funds
- custodian fees
- ticket charges
- 12b-1 fees may be charged on mutual fund assets transferred into the management of T. Anton Investment House. When such instances occur, we strive to transfer or exchange the assets for a mutual fund or share class that does not charge such fees. T. Anton Investment House does not receive 12b-1 fees.

All stock transactions will be charged the normal miscellaneous costs of postage, transfer and any SEC fees as charged by TD Ameritrade (our clearing firm). Clients will pay the commission charges for all stock and bond transactions. Changing to a proprietary model or rebalancing a portfolio may create trading costs. Care is taken to reduce the cost wherever possible.

We direct clients to this brochure's Item 12 for further discussion of brokerage costs.

5.D. Disclosure: Do clients pay fees in advance? How may a client obtain a refund of a pre-paid fee if the contract is terminated prior to a billed period's end? How will the amount of the refund be determined?

T. Anton Investment House calculates the fees quarterly in arrears, using the market value of the portfolio assets on the last business day of the preceding quarter. T. Anton Investment House retains the right to change the rates after 90 days' advance notice in writing.

Our fee is charged quarterly, in arrears and is based on the market value of the assets in the account on the date of the close of the previous quarter. Due to the fee being charged in arrears, there are no refunds for advisory fees. However, if you withdraw your assets prior to the quarter end, you will be billed for a pro-rated fee based upon the number of days in the quarter during which the assets were under our management. Similarly, if an account is opened during the billing quarter, you will be billed for a pro-rated fee based upon the number of days in the quarter during which the assets were under our management.

5.E. Neither the firm nor any of its supervised persons accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Other disclosures for this section: Our firm does primarily recommend mutual funds to our clients. Those recommendations do include "no-load" funds, which impose no commission or sales charge ("load") on the shareholder and are purchased directly from the custodian, rather than through a broker. T. Anton Investment House will also accept an existing portfolio as is, including a mix of individual stocks and bonds; the firm's representatives are fully licensed to handle these portfolio components.

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

Our firm does not charge performance-based fees [fees based on a portfolio's increase in asset value]. [See also: Form ADV Part 1A, Item 5. E. (6).] T. Anton Investment House does not have a supervised person who manages an account that pays performance fees.

NOTE: Regulators have stated that performance fees can cause incentives for an adviser to manage a portfolio with an eye to short term gains only, including investments that are more speculative or have a higher risk of loss. They may also tempt an advisor to allocate more time to them than to other clients' portfolios due to the possibility of a higher fee.

As a fiduciary, an investment adviser is to provide equitable treatment to each client's managed portfolio as if it were the adviser's own portfolio - within the investment parameters agreed to with the client.

#### Item 7. : Types of Clients

1. Typically our clients include high net worth and other individuals, and corporations and other businesses. We are prepared to provide services to pension and profit-sharing plans, charitable organizations, estates, and trusts as well. T. Anton Investment House typically requires a \$500,000 account minimum. However, we do consider accepting smaller accounts on a case-by-case basis.

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

A. An adviser must describe its methods of analysis and investment strategies used in formulating its investment advice. It must explain in detail any unusual risks.

**Caution: Investing in securities involves risk of loss which a client must be able to bear.**

An adviser must explain the material risks involved for each significant investment strategy or method of analysis used and particular type of security recommended. In formulating advice, T. Anton Investment House may apply fundamental analytical methods.

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Fundamental Analysis – Called the “bottom-up” approach to investing, a fundamental analysis seeks an in-depth understanding of a specific firm/ company to evaluate its intrinsic value and its future prospects before investing in its stock. Such an analysis studies the firm's management, its debt, equity and cash flow, history of financial performance/ growth, dividend payout percentages, its products, operating efficiency and marketing structures, among other factors. The firm's balance sheet and income statement are two key sources of information about the firm.

Fundamental Analysis will compare a firm's stock price with its earnings per share and its net earnings to its gross revenues and compare both with the averages for that industry sector. The ratio of current liabilities to current assets is another important element of this form of evaluation. A central focus is deciding whether the stock is over-valued or undervalued.

As a term in large-scale economics, a fundamental analysis studies gross national product, inflation and interest rates, trade and unemployment trends, consumer confidence, savings and spending patterns and inventories in order to predict the larger movements of national and international economies. These larger concerns greatly influence the elements considered in a fundamental analysis of any given company.

Investment Strategies – T. Anton Investment House, Inc. creates an investment strategy using fundamental analysis and asset allocation principles to construct a portfolio. Investment portfolios are designed to meet client's investment and financial planning objectives ranging from aggressive growth, growth, growth and income, income, and preservation. T. Anton Investment House, Inc. primarily uses mutual fund selection to facilitate the investment strategy, focusing on companies with long-standing track records. Upon the initial review of a client's portfolio, T. Anton Investment House, Inc. analyzes each security determining its validity in the overall portfolio based on the



client's investment objectives. T. Anton Investment House, Inc. gathers data from the client, during an in-depth personal interview process, in order to understand the client's circumstances. Once the client's objectives, time horizon, risk tolerance, tax sensitivities, and personal and financial circumstances are fully understood, we recommend an asset allocation and appropriate investment model. Either our proprietary model or a customized version will be used. Client portfolios also take into consideration market opportunities including investments in specific sectors, various market capitalizations and international markets.

T. Anton Investment House, Inc. utilizes a variety of research avenues to determine the model composition including meetings with wholesalers, money managers, other advisors and financial news sources including Morningstar.

Risks - Inherent in using a fundamental analysis: The factors involved can require time-consuming study that can fall behind the need to make decisions, if such factors begin to change rapidly. Few of the numbers are absolutes; many are relative to other factors or industry sector information. Most require intelligent judgment and experience to be applied meaningfully to stock values.

Fundamental analysis places value on the financial structure and health of the firm to be invested in. These factors at times are of little or no interest to the market place, such that the stock prices for very sound companies may wither when investors look to other reasons and areas for investing.

For a relatively short time period, a firm can falsify facts to hide poor performance or a fragile financial situation. The independence of balance sheets' and other reports' numerical information from such possible manipulation may not be readily verifiable. Additionally, time spent using any one analytical method will compete with other analytical methods which might have proven more useful and profitable.

The adviser uses various sources of information for its analyses, which may include any of the following:

- Financial newspapers and magazines
- Research materials prepared by others
- Annual reports, prospectuses, filings with the Securities and Exchange Commission

8. B. An advisor must explain the material risks involved in frequent trading if its strategy involves frequent trading of securities. An advisor must explain how frequent trading can affect performance.

The firm's trading strategy is primarily to hold purchases for the long term (a year or more). This strategy does not normally lead to "frequent trading." The firm may rebalance portfolios periodically in order remain true the client's objectives. What may be regarded as frequent trading varies according to

- the client and the strategy for that client's specific account – one client may have multiple accounts that apply different strategies
- to the type of security or relative mix of securities involved
- and to the current nature of the market.

The intention with all strategies is to enhance the portfolio's value and its ability to meet a client's stated goals. All trades will add some costs to be deducted from a client's account and could reduce the overall return or growth in a client's account, if carefully measured against what its value would have been had the adviser not placed the transactions.

8.C. Do we recommend primarily a particular type of security? What are the material risks involved with that type of security? Are those risks unusual or significant? We primarily recommend mutual funds. We are prepared to provide advice on and management of most types of securities, including :

<u>Equity Securities</u>	<u>Notable risks involved with this type of investment</u>
exchange-listed securities	Market fluctuations can bring losses, lower dividends
over-the-counter securities	More susceptible to market fluctuations; higher risk
foreign issuers	Not always under US financial reporting standards; higher risk
Warrants	Same as OTC
Corporate debt securities	Same as exchange listed, corporate bonds involve credit risk

Commercial Paper		More susceptible to market fluctuations; higher risk of default
Certificates of deposit		Limited liquidity
Municipal securities		Same as exchange listed; It is possible that they can default
<u>Investment company securities</u>		
variable life insurance		Insurance company could go out of business; the value of the subaccounts are subject to market fluctuation and loss
variable annuities		Same as variable life
mutual fund shares		Market fluctuations can bring losses; various fees
US government securities		Returns can be low or even, rarely, negative. As hedge against equity market risk, mirror them.
<u>Interests in partnerships investing in</u>		
real estate, oil and gas other		Historically prone to bubbles and after effects; may lose entire amount invested; not covered by SIPC
Other: T. Anton Investment House will provide investment advice about all types of securities, to the extent needed to perform investment analysis and meet the specific investment needs of each client.		

We do allow for margin accounts, which carry financial risks for available liquidity calls.  
Please see Item 12 for further description of our brokerage practices.

#### Item 9.: Disciplinary Information

What facts about any legal or disciplinary event involving our firm or its personnel should you know of, because it is material to an evaluation of the integrity of our firm or its management persons?

Form ADV 2A requires that we inform you, our client, if our firm or any of our management persons has been involved in any of the events listed below in 9. A, B, and C. and, beyond those points, if there is any material fact about any legal or disciplinary event that you should know about in order to evaluate our integrity. You may also see these same questions answered online at the investment adviser public disclosure site (IAPD), in Part 1A, Item 11.

Our firm and its management persons have not been involved in any events that come under this item, to include Criminal or Civil Actions, Administrative Enforcement Proceedings or any Self-Regulatory Organization's Proceedings.

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

What material relationships does our firm or any of our management persons have with related financial industry participants? What material conflicts of interest may arise from these relationships and how are these conflicts addressed?

A. Have we, or has any of our management persons, registered either as a broker-dealer or as the representative of a broker-dealer? OR, Do we or any management person have such a registration pending?

T. Anton Investment House is registered only as an investment advisory firm. The firm is not affiliated with or related to any Broker Dealer. The adviser cannot itself charge a commission.

The firm's associates may have invested in the same, similar, or opposite securities as those they recommend to their advisory clients. These are mostly mutual funds and widely held equities. If the advisor deems there may be a conflict of interest, T. Anton Investment House will disclose to the client the nature of those holdings. Any client transaction will always precede proprietary accounts.

B. Have we, or has any of our management persons, registered as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of any of these entities named here? OR, Do we or any management person have such a registration pending?

No, none of this item applies to our firm.

C. Do we have any "related person" – a person or a firm that we control or that controls us through ownership or as an officer – with whom we have a material relationship, any arrangement that may cause a conflict of interest when providing our clients with investment advice?

No. T. Anton Investment House has no related firm or person who is :

- a Municipal Securities Dealer
- a Government Securities Dealer or Broker
- an investment company or other pooled investment vehicle , including a mutual fund,
- a closed-end investment company
- a unit investment trust
- a private investment company
- a hedge fund
- an offshore fund
- another investment adviser/ financial planner
- a futures commission merchant, commodity pool operator or commodity trading advisor
- a bank or a thrift institution
- an accountant or accounting firm
- a lawyer or a law firm
- an insurance company or agency
- a pension consultant
- a real estate broker or dealer
- a sponsor or syndicator of limited partnerships.

An adviser's **related persons** are: (1) the adviser's officers, partners, or directors (or any person performing similar functions); (2) all persons directly or indirectly controlling, controlled by, or under common control with the adviser; (3) all of the adviser's current employees; and (4) any person providing investment advice on the adviser's behalf.

D. Do we recommend or select other investment advisers for our clients?

No, T. Anton Investment House does not recommend any other outside management's programs or platforms.

Item 11.: Code of Ethics — Advisory Persons' own trading and possible personal interest in our clients' trades.

A. As required by SEC rule 204A-1 or similar state rules our firm has adopted a Code of Ethics which describes our policies and procedures to abide by the law's prohibition against insider trading, including our reviews of our own persons' trades, and other ethical considerations. We will provide clients or potential clients with a copy of our Code of Ethics upon written request.

Please note that using any insider information, information that is not readily available to all participants in the securities markets (upon making a reasonable effort to obtain that information), for any person, ourselves or relatives or clients or any other person, is strictly illegal and punishable by fines and imprisonment.

How our firm controls sensitive information:

- Building security: visitor screening, and other building security
- locked office doors
- password protected computer screens and databases
- fire prevention equipment
- office area under continual supervision during business hours.
- Clean desk policy.
- Secure server access remotely via VPN.

Steps the firm has taken to prevent employees from misusing any inside positions: the firm's registered representatives sign an acknowledgement to abide by its Code of Ethics, which prohibits the use of insider information.

11. B. Does our firm or a related person recommend to our clients, or do we buy or sell for our clients' accounts, securities in which we or a related person has a material interest?

Our firm and/ or its associates **do**

- buy or sell for the firm or for themselves shares of mutual funds that we also recommend to our advisory clients;
- invest or are permitted to invest in other securities related to those we may recommend to clients, to include ETFs, but not mortgage- based derivatives.

Our firm and its associates **do not**

- buy securities for the firm or for themselves from advisory clients (principal transactions);
- sell securities the firm or its associates own to advisory clients (principal transactions);
- in their capacity as a broker/ dealer agent, transact purchases or sales of any client's securities directly to any other person (an "agency cross transaction" that side-steps using a securities market place)
- buy or sell for the firm or for themselves securities (other than shares of mutual funds) that we also recommend to our advisory clients;
- recommend securities (or other investment products) to our advisory clients in which our firm or any person or other firm related to our firm has some other proprietary (ownership) or other financial interest.
- Act as an investment adviser to an investment company that we recommend to our clients.

11. C. Personal Trading. : investing in the same or related securities

Does our firm permit itself, its personnel, or a person related to our firm (by ownership or other forms of control) to invest in the same securities that we recommend to our clients, or in securities that are related to those securities, such as options or other derivatives?

Yes, we do allow it. When our firm or its personnel buy or sell securities for their own accounts, we will always place clients' orders before our own. We enforce these guidelines by self-discipline.

The possible conflicts of interest that arise whenever we recommend, or, in our discretion, buy or sell for you a security that we may also buy or sell for ourselves are

- using your order's market effect to benefit ourselves ("front running");
- using your order as "inside information" that would give us an unfair advantage in the markets to benefit ourselves or any other person (which is an illegal act);
- gaining a lower brokerage cost for ourselves in bunching orders, which can create an incentive to involve your account in that transaction.

Does any person in our firm participate in or have an interest in our clients' transactions? NO.

No one in the firm has a financial interest in any investment transaction the firm recommends to its clients. Examples of such interests would include an adviser recommending that clients invest in a pooled investment vehicle that the firm advises or for which the investment adviser serves as the general partner, or when an adviser with a material financial interest in a company recommends that a client buy shares of that company.

11. D. Personal Trading. : investing in the same or related securities at the same time.

What specific conflicts do we have when our firm or a related person trades in the same securities at or about the same time as it places trades for a client's account?

The SEC has stated that "an adviser's ability to place its own trades before or after client trades in the same security may affect the objectivity of the adviser's recommendations" and therefore states further that the SEC believes disclosure of this practice is warranted. The SEC has not in that opinion stated a specific length of time before or after. In that respect it could also be noted conversely that clients might have reservations in employing an adviser who does not invest in the same securities the adviser recommends.

#### Item 12.: Brokerage Practices

12. A. Does our firm select a broker/ dealer for you? On what basis do we do so? How do we determine the reasonableness of the broker's compensation (commission charges)? We may recommend a broker-dealer for our clients' transactions: TD Ameritrade is a clearing and custodial broker dealer which can both receive and hold funds and securities.

12. A. 1. Research and other "Soft Dollar" benefits: Do we have any conflicts of interest such as receiving "soft dollars" from the broker/ dealer?

T. Anton Investment House receives NO soft dollar benefits from any broker-dealer, or other third party source. T. Anton Investment House has entered into a written agreement with TD Ameritrade Inc. to provide services to its customers, including

- the execution of orders,
- preparation and mailing of confirmations and monthly statements to customers,
- settlement of securities transaction orders and
- cashiering functions involving the settlement of securities transaction and
- safekeeping of customer funds and securities.

None of the above normal brokerage services is a "soft dollar" arrangement.

Clients need to understand that "soft dollars" are an enticing benefit for an adviser in so far as they provide access to research and / or other products both of use to the adviser in its business and at no expense to the adviser. Clearly, such an enticement creates an incentive to use the broker-dealer in question and may cause the adviser to use a broker that charges the adviser's clients higher commission

rates than another broker-dealer. An adviser has a duty to seek the best execution of trades for its clients, which includes considerations in addition to the commission rate, however.

12. A. 2. Brokerage for client referrals

Do we direct brokerage to a specific broker-dealer in return for client referrals either to our firm or to a related firm? No, we do not. [see also ADV 1A's 8 F]

Note: Directed brokerage may result in brokerage costs that are higher than a client might obtain from another broker-dealer.

12. A. 3.

[a] T. Anton Investment House does routinely recommend TD Ameritrade to be the broker dealer for its advisory clients. We do not "request or require" any client to use our services.

[b] Do we permit a client to direct brokerage to a specific broker-dealer? We can if a client requires us to do so. Clients should understand that their choice of broker-dealer may lead to higher brokerage costs than they might have otherwise obtained, due to higher rates or an inability to aggregate orders and thereby reduce transaction costs.

12. B. When we place orders with a broker/ dealer for our clients, do we aggregate or "bunch" your trade order with orders for other clients? NO, we do not normally aggregate orders; if we can obtain better transaction costs for our clients by aggregating orders and have an opportunity to do so, we will.

Item 13.: Review of Accounts

13. A. Does someone in our firm review your investment account portfolio and how often?

Ms. Tracey Anton, the firm's President, reviews all written reports that serve as the basis for financial plans and asset portfolio management, to ensure that investment recommendations are consistent with each client's needs and suitability parameters.

At least annually the advisor will meet with or contact a client to review the previous financial plan's information, with updates done as often as the client requests. Frequency can vary from once a year to once a month. Financial planning reports will update prior information provided to clients and generate new tax projections, cash flow, retirement planning, emphasizing uncompleted previous recommendations, etc. Client accounts that have established a "discretionary" or "managed" account with T. Anton Investment House receive weekly or "on-going" reviews, as specific securities holdings are re-evaluated; Ms. Anton will review specific portfolios at least annually.

13. B. What factors might trigger a review in addition to our periodic reviews?

Changes in tax laws or disruptions in the economy, as well as a client's request, can trigger an update.

13. C. What regular reports do we or others provide you? Are they written reports? What do they contain? A financial plan may be a written report or essential notes which the adviser will update as needed or indicated by a client to generate new tax projections, cash flow, retirement planning, emphasizing uncompleted previous recommendations, etc. Frequency can vary from once a year to once a month. Clients will receive monthly and/or quarterly account statements that show all activity in their accounts, including any withdrawals to pay the adviser's fees, dividends credited to the account, purchases and/or sales, and any reorganization items (stock splits, etc.). Clients are encouraged by T. Anton Investment House, Inc. to review their account statements received from the current custodian with any other statement they may receive. Additionally, each client will receive a performance report from T. Anton Investment House showing account performance to date when they attend an in-house, virtual, or phone review.

Item 14.: Client Referrals and Other Compensation

A. Does someone other than a client of our firm pay our firm or related persons, or otherwise provide some economic benefit to our firm, for the investment advice we provide to our clients? [12b-1 fees; other; sales awards or prizes]

NO. We receive no 12(b)-1 fees or other payments from non-clients.

B. Does our firm or a firm related to us through some form of ownership pay someone, directly or indirectly, for client referrals? NO. T. Anton Investment House does not pay any solicitor for client referrals.

Item 15.: Custody

Does our firm have custody of your assets?

The practice of “direct billing” has been defined by the SEC as a form of custody, but also as a “modern practice” that does not require annual audits. Direct billing also requires that the client receive at least quarterly statements from the account custodian, showing the advisory fee. Direct billing is the only form of custody that applies to T. Anton Investment House. That form of custody is not the intent of this Item’s questions. The qualified custodian(s) of our clients’ assets is TD Ameritrade LLC. By email or by US Postal Service, the custodian will send our clients at a minimum a quarterly account statement, monthly statements or confirmations for any month in which there was trade transaction activity in the account.

NOTE: Clients should review these statements carefully. It is not the custodian’s responsibility to ascertain the accuracy of the calculation for fees subtracted from your account.

Item 16.: Investment Discretion

A. Does our firm have discretionary authority over your assets? Yes, T. Anton Investment House does require its clients to allow the firm discretion over the client’s accounts.

B. What limitations are there, or can you place, on our discretionary authority? Suitability parameters, as the client and the adviser establish in the initial interview, are the over-riding limitation on any discretion. The firm gains discretionary authority over a client’s account only if and when that client signs a limited power of attorney stating that allowance specifically. A client may revoke that permission at any time. A client may impose reasonable restrictions on the securities T. Anton Investment House may select for purchase or for sale, if the client provides clear, written directions to the firm.

Item 17.: Voting Client Securities — proxy voting practices

A. Our firm does not have and will not accept authority to vote our clients’ securities / proxy votes.

B. This is our policy and our procedures: that we do not vote proxies. Our firm urges our clients to read and participate in the voting process tied to the shares they own in various companies as an excellent means for our clients to become familiar with those companies in which they are invested. Clients will receive their proxy votes directly from the custodian broker dealer. Clients may call the firm to ask questions regarding their proxy votes.

Item 18.: Financial Information

A. T. Anton Investment House does not have to provide a Balance Sheet under this section. Advisors who have custody of their clients’ securities or funds, or who have a related firm that has such custody are required to provide a balance sheet under Item 18.

Regarding Custody situations, our firm:

- Does not require prepayment of a fee of \$1,200 or more, 6 or more months in advance of services.

- No one in our firm act as the trustee for an advisory client.
- We do practice “Direct Billing” (charging our fees to your account), as described above in Item 15: “Custody” – where we noted that it is a form of custody that does not carry with it any requirement for audits of separate accounts, or to be marked as “custody” in Form ADV Part 1A, or a balance sheet in this section of the ADV Part 2A.

18. B. Financial difficulties: Our firm has discretionary authority over your assets [see Item 16]. We must therefore disclose if there is any financial condition reasonable likely to impair our firm’s ability to meet its contractual commitments to its clients. T. Anton Investment House has no such condition. The question is important, especially if an investment adviser has discretion, custody or both; if our financial condition were precarious, our clients would be exposed to increased risks that we might not manage their assets properly, according to the SEC.

18. C. T. Anton Investment House has never been the subject of a bankruptcy.

Part 2B: The Brochure Supplement: Here we provide information about advisory personnel on whom you rely for investment advice. We must provide this supervised person’s supplement to you, our client initially at or before the time when that specific supervised person begins to provide you with advisory services.

December 31, 2021

T. Anton Investment House, Inc.  
6300 University Avenue  
Middleton, Wisconsin 53562  
Telephone : (608) 501-1549

Item 1. Cover Page.

This brochure supplement provides information about Tracey C. Anton that supplements the T. Anton Investment House, Inc. brochure. You should have received a copy of that brochure. Please contact Tracey Anton if you did not receive T. Anton Investment House’s brochure or if you have any questions about the contents of this supplement. Additional information about Ms. Anton is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Tracey Carol Anton  
Born 5-8-1970  
CRD# 2457436

Item 2. Educational Background and Business Experience

Ms. Anton attended the University of Wisconsin at Madison from 1988 to 1993 and earned a Bachelor of Business Administration in Finance. She has also passed several securities industry examinations : The Series 7 (9/94); the Series 28 (12/96); the Series 63 (11/94); the Series 24 (2/03); the Series 51 (5/03), the Series 53 (7/10) and the CERTIFIED FINANCIAL PLANNER™, CFP® on June 11, 2014.

Ms. Anton is a Certified Financial Planner from June 2014 to present.

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:



- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification

From 7/1998 to 02/2015: Ms. Anton was Vice President, Chief Compliance Officer, Financial Operations, Secretary and investment advisory representative for Googins & Anton, Inc.

From 11/1994 to 07/1998 she was a registered representative of the broker dealer, Googins & Co., Inc.

From 2/1992 to 11/1994 she was an assistant planner at Googins & Co., Inc.

From February 2015 she is the owner, President and investment adviser representative of T. Anton Investment House, Inc.

### Item 3. Disciplinary Information.

Ms. Anton has no disciplinary events to disclose.

### Item 4. Other Business Activities. Item 4. Other Business Activities.

Ms. Anton has no other business activity.

### Item 5. Additional Compensation.

Ms. Anton has no business incomes other than the fees she earns from providing investment advice through this firm.

Item 6. Supervision.

Ms. Anton is her own supervisor. She maintains copies of her proprietary investment accounts, their holdings and transactions, in the firm's offices for regulators to review at will.

Item 7. State Registration requirements

There are no items to report under this heading for Ms. Anton. She has not been the subject of a petition for bankruptcy proceedings and none of the disciplinary events noted under Item 7 applies to her.