



## Form ADV Part 2 Disclosure Brochure

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December 4, 2023

This brochure provides information about the qualifications and business practices of DWR Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at the telephone number and/or e-mail address above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority. Our e-mail for regulatory compliance is [chiefcomplianceofficerdwr@gmail.com](mailto:chiefcomplianceofficerdwr@gmail.com).

DWR Wealth Management, LLC is a registered investment advisor. Registration of an investment advisor does not imply any level of skill or training. The verbal and written communications of an investment advisor provide you with information you need to determine whether to hire or retain the advisor.

Additional information about DWR Wealth Management, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The Firm's CRD number is 133743.

## Item 2 - Material Changes

Our previous annual updating amendment was dated February 7, 2023. This item will be updated with the next annual updating amendment to reflect material changes to the Part 2.

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#### Item 4 - Advisory Business

DWR Wealth Management, LLC ("DWR") is a fee-only investment advisor located in San Jose, California. DWR has been providing advisory services since March of 2005. The firm's principals are David Rex Rousselot, Ricky D. Dunham, and Tracy L. Newquist.

As of September 30, 2023, we manage assets of \$148.5 million on a discretionary basis and \$1.3 million on a non-discretionary basis. In addition, we have assets under advisement of \$3.4 million in retirement plans.

##### Advisory Services

**Portfolio Management Services:** DWR works with clients to determine the client's specific investment objectives. These objectives are set forth in a written Investment Policy Statement (IPS) that describes an asset allocation that conforms to the client's risk tolerance level, investment time horizon, and expected rate of return requirements. Investment and portfolio allocation software is used to evaluate alternative portfolio designs. DWR evaluates clients' existing investments with respect to their IPS and works with new clients to develop a plan to transition from their existing portfolio to the portfolio recommended by DWR. DWR continuously monitors clients' portfolio holdings and holds regular review meetings with clients regarding their portfolio, as necessary.

DWR will typically create a portfolio of passively and/or actively managed mutual funds and/or exchange traded funds (ETFs), and where appropriate, alternative investments. DWR can also use model portfolios if the models match client's investment policy. DWR will allocate a client's assets among various investments taking into consideration the client's unique need, ability, and willingness to take risk.

Mutual funds or Exchange Traded Funds (ETFs) that follow a passive investment philosophy generally have low holdings turnover. Consequently, the fund expenses are generally lower than fees and expenses charged by other types of funds. Client portfolios can also include some individual equity securities, but these are generally part of clients' investment holdings prior to working with DWR or purchased at a client's direction. DWR manages portfolios on a discretionary and, in limited circumstances, on a non-discretionary basis.

For certain clients, DWR provides an additional service for client held-away accounts that are maintained at independent third-party custodians. These are primarily 401(k) accounts, 529 plans and other assets DWR does not directly manage and that are maintained by the client. DWR regularly reviews the current holdings and available investment options in these held-away accounts, monitors the held-away accounts, rebalances and implements the client's investment strategies as necessary. Additional information regarding this service is contained within Item 5.

For certain clients, DWR provides continuous investment advice and reporting to the Client on agreed upon accounts where DWR does not have trading discretion. Client will have the responsibility to implement all recommendations made by DWR on such accounts. DWR will provide reporting for accounts to which DWR is provided access through the total account solution platform (outside account aggregation) or other acceptable medium.

DWR does not provide portfolio management services to a wrap fee program.

**Wealth Management Services:** DWR provides wealth management services, which are more holistic services that can encompass all parts of a client's financial life, and include financial planning, retirement planning, charitable gift planning, college planning, estate planning, risk management consulting, and assistance with assets outside DWR's direct management. In certain instances, this may include input from outside financial experts as well as the client's own service professionals (for example, attorney or accountant) to craft the optimal strategy to benefit the client.

When appropriate, DWR will engage a subadvisor to manage all or a portion of a client's assets. DWR enters into a contract with each subadvisor. DWR will ensure that all recommended advisers are registered or notice filed in the states in which DWR is recommending them to clients. The subadvisor fees will be deducted directly from the client account and are in addition to fees paid to DWR.

### Financial Planning Services

Financial Planning and Consulting Services: DWR provides advice in the form of financial planning as the core foundational component of the wealth management services provided to certain DWR clients. Financial planning or financial consulting services are also offered as stand-alone services for limited scope engagements.

In general, the financial planning or financial consulting services will address, and may not be limited to, some or all of the following areas of concern:

- Personal: Family needs, budgeting, personal liability, estate planning, and financial goals
- Business: Business ownership, counsel on retirement plans, and monetization
- Education: 529 plans and general assistance in preparing to meet continuing educational needs
- Tax & Cash Flow: Income tax, spending analysis and planning for past, current, and future years
- Death and Disability: Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis
- Retirement: Analysis of current qualified accounts/plans, investments, and strategies to help achieve retirement goals
- Investments: Analysis of investments, alternatives, and their effect on a client's portfolio
- Divorce Planning: Assistance with financial issues and decisions that face couples in process of divorce

Information gathered from clients includes family information, estate plan information, current financial status, business ownership and financial information, future goals, and attitude toward risk.

Implementation of financial plan recommendations is entirely at the client's discretion. Financial planning recommendations are of a generic nature and are not limited to any specific product or service offered by a broker dealer or insurance company.

For certain clients, DWR will monitor and update the client's plan at least annually and assist in the implementation of plan strategies for client assets under DWR's direct management. DWR suggests the client work closely with his/her attorney, accountant and/or insurance agent to implement the recommendations contained in the plan with respect to held-away accounts, insurance, and business interests.

Should a stand-alone financial planning or financial consulting service client choose to implement recommendations contained in the plan, DWR suggests the client work closely with his/her financial advisor, attorney, accountant and/or insurance agent. Client is not obligated to engage DWR to implement the recommendations contained in the plan or any portion of the plan. DWR has no responsibility to implement the recommendations contained in the plan.

Retirement Plan Services: DWR provides advisory services to employer sponsored retirement plans using the third-party record keeping and administrative services of certain retirement plan service providers.

For such clients, DWR will assist the plan in creating an investment policy statement defining the types of investments to be offered and the restrictions that will be imposed. DWR will analyze the plan's current investment platform, or in the case of new plan the recommended investment platform, and recommend investment options to

achieve the plan's objectives, provide participant education meetings and monitor the performance of the plan's investment options.

DWR will periodically review plan investment options and investment policy statements, and will recommend changes in the plan's investment options, as appropriate, from time to time.

In certain circumstances, DWR also serves in the capacity of "investment manager" to certain retirement plans. As such, DWR will additionally accept discretion to select available investments for the plan as well as create managed portfolios and make them available to plan participants.

DWR will continually 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

### Financial Planning

Financial planning services are provided for an hourly fee of \$250. In lieu of the hourly fee, we may negotiate a flat fee ranging from \$1,500 - \$5,000. Services are billed either upon completion of the financial plan or in monthly or quarterly installments, as agreed upon at the inception of the relationship. Invoices are payable upon receipt.

You may cancel our financial planning agreement at any time by providing written notice. Upon cancellation, we will present you with an invoice for time spent. This invoice is payable upon receipt.

We have a conflict of interest when providing financial planning services. When you implement the financial plan through us, we receive the customary fees as disclosed in the following section. You are not required to employ us to implement the financial plan, or implement the plan, or any portion of it, at all.

### Investment Management Services

Advisory Fees & Billing Practices: Fees for investment advisory services are calculated as a percentage of assets under management. These fees are billed quarterly in arrears, based on the assets under management as of the last day of the calendar quarter. Our standard fee schedule is:

<u>Account Value</u>				<u>Annual Fee</u>
For the first amount from	\$0.00	to	\$500,000.00	1.00%
For the next amount from	\$500,000.01	to	\$1,000,000.00	0.80%
For the next amount from	\$1,000,000.01	to	\$2,000,000.00	0.60%
For the next amount from	\$2,000,000.01	to	\$5,000,000.00	0.50%
For the next amount from	\$5,000,000.01			0.40%

We use our standard fee schedule and can deviate from the fee schedule based on current investable assets and/or future investable assets.

Clients referred to a subadvisor will also pay the subadvisor's management fee, which is disclosed to the client at the time these services are offered.

You may elect to provide authorization for us to deduct our fees directly from your investment account. Important information about the deduction of management fees:

- You must provide authorization for us to deduct fees when signing our contract.

- You will receive a detailed invoice each quarter which outlines our fees and how they are calculated at the same time we request payment from the custodian.
- You will receive a statement from your custodian which shows all transactions in your account, including the deduction of our fee.
- You are responsible for reviewing the accuracy of the fees being billed, as the custodian will not do so.

You may choose to pay by check rather than having payment deducted directly from your account.

If you would like to end our advisory relationship, you may do so by providing 30 days written notice. We will prorate the advisory fees received through the termination date and send you an invoice for the advisory fees due.

#### Other Costs Involved:

In addition to our advisory fee shown above, you are responsible for paying fees associated with investing for your account. These fees include:

- management fees for ETFs and mutual funds. These are fees charged by the managers of the ETF or mutual fund and are a portion of the expenses of the ETF or mutual fund.
- brokerage costs and transaction fees for any securities or fixed income trades. These are generally charged by your custodian and/or executing broker.

Additional information about brokerage costs and services is provided in "Item 12: Brokerage Practices."

We believe the fees mentioned above are competitive; however you may be able to obtain similar services from other sources at a lower price.

#### Retirement Plan Services

The annual fee for DWR's Retirement Plan services is charged on a quarterly basis and is based on a percentage of assets within the plan and typically ranges from 0.10% to 1.00% per year. These fees are billed quarterly in arrears, based on the assets under management as of the last day of the calendar quarter. The annual fee will be based upon a number of factors including the size of the plan, the number of participants, the number of locations as well as the method of employee education and the services required. Fees will typically be tiered, and the fee is calculated by applying a different fee rate to each corresponding range of the plan's account balance. Generally, the annual fee for plan services will not be higher than DWR's standard fee schedule for accounts set up through the retirement plan service providers.

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

We do not receive performance fees for managing accounts.

#### Item 7 - Types of Clients

A majority of the clients are high net worth individuals and we provide investment advice as a registered investment advisory to several companies in regards to their 401(k) retirement plan.

Generally we require that you maintain \$250,000 under management with us. However, we may waive that minimum at our sole discretion.

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

DWR Wealth Management employs asset allocation models through the modern portfolio theory. The Investment models range from conservative balanced to a pure equity model. DWR Wealth Management employs the use of investment models in our investment approach. Each model is well diversified amongst several asset classes and incorporates many different open-ended mutual funds, thus mitigating any unusual risks. The firm does not involve frequent trading as a part of the investment approach,

Investment advice may be offered on any investments held by a client at the start of the advisory relationship. The primary vehicles recommended for investing are registered funds and ETFs. <<DWR generally recommends only investment grade bonds and monitors these securities for changes in rating.>>

If appropriate for a particular client, DWR recommends certain alternative investments, that are registered investment company funds, for certain clients.

As a component of the financial planning process, DWR may also evaluate insurance products such as annuities and various types of life insurance products and the impact on the client's financial profile and planning.

DWR's security analysis is based on several factors, including those derived from academic research and literature, commercially available software technology, securities rating services, general market and financial information, due diligence reviews, and specific investment analysis that clients request.

Because every client's situation is unique, DWR firmly believes the best investment plan for a client begins with the client's specific circumstances and objectives. Financial success means different things to different people. DWR begins with a comprehensive discovery process to define the client's values, goals and priorities, family relationships, assets, types of accounts, professional advisors, preferences, and personal interests.

DWR's discovery process also includes a risk assessment to determine the client's willingness to accept different types of risk in pursuit of their short-term, mid-term, and long-term goals. Achieving these goals commonly requires accepting some measure of risk. Most investors will need returns in excess of inflation to meet their objectives.

DWR considers the following factors when constructing a client's investment plan: The client's unique purpose for the portfolio, portfolio size, specific funding sources, how and when a client plans to use the funds, and the degree of uncertainty or risk a client is willing to accept in pursuit of their stated objectives. With a clear understanding of a client's goals and circumstances, DWR can build the foundation of an investment plan that best matches the client's needs as well as the realities of risk and the financial markets.

### Risk of Loss

All investments are subject to risk. Investing in securities involves risk of loss that clients should be prepared to bear.

**Principal Risk:** All investments present the risk of loss of principal – the risk that the value of securities (mutual funds, exchange traded funds (ETFs), equity securities, alternative investments, 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 can be less than the purchasing power of the original investment.

**Mutual Fund and ETF Risk:** DWR utilizes mutual funds and ETFs invested in domestic and international equities, including real estate investment trusts (REITs), corporate and government fixed income securities, commodity futures and, in certain circumstances, funds that are focused on seeking alternative sources of return that have low or negative correlation to stocks and bonds, including funds investing in alternative lending securities, reinsurance



related securities, managed futures and currencies. Equity securities 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.

Riskier mutual funds and ETFs used in DWR's investment strategies are the U.S. and international small capitalization and small capitalization value funds, emerging markets funds, commodity futures funds, alternative lending securities funds, reinsurance funds, managed futures funds and funds holding currencies.

DWR utilizes mutual funds and ETFs invested in international securities. Investing outside the United States involves additional risks, such as currency fluctuations, periods of illiquidity and price volatility. These risks can be greater with investments in developing countries.

Information about the risks of any market sector can be reviewed in the representative mutual fund prospectuses within each sector.

**Asset Allocation Risk:** A fund's selection and weighting of asset classes and/or underlying funds can cause it to underperform other funds with a similar investment objective.

**Alternative Fund Risk:** Certain alternative funds (registered under the Investment Company Act of 1940) utilized by DWR may employ use of derivatives, options, futures and/or short sales. Use of derivatives, options or futures by a Fund may be for purposes of gaining exposure to a particular asset group, for hedging purposes or for leverage purposes. The use of derivatives, options and futures exposes the funds to additional risks and transaction costs. In addition, if the Fund uses leverage through activities such as entering into short sales or purchasing derivative instruments, there are additional risk, including the fund having the risk that losses may exceed the net assets of the fund. The net asset value of a fund while employing leverage will be more volatile and sensitive to market movements. Clients should carefully review the fund's prospectus to more fully understand the risk of funds employing the use of derivatives, options, futures and/or short sales. Investments in these funds should be avoided where an investor has a short-term investing horizon and/or cannot bear the loss of some or all of the investment.

**Equity Securities Risk:** Equity securities (common, convertible preferred stocks and other securities whose values are tied to the price of stocks, such as rights, warrants and convertible debt securities) could decline in value if the issuer's financial condition declines or in response to overall market and economic conditions. A fund's principal market segment(s) – such as large cap, mid cap or small cap stocks, or growth or value stocks – can underperform other market segments or the equity markets as a whole. Investments in smaller companies and mid-size companies can involve greater risk and price volatility than investments in larger, more mature companies.

**Fixed-Income Securities Risk:** Fixed-income securities are subject to interest rate risk and credit quality risk. The market value of fixed-income securities generally declines when interest rates rise, and an issuer of fixed-income securities could default on its payment obligations. Conservative fixed income securities have lower risk of loss of principal, but most bonds (except for Treasury Inflation Protected Securities (TIPS)) present the risk of loss of purchasing power through lower expected return. Loss of purchasing power risk is greatest for longer-term bonds.

The risk of loss described herein should not be considered a complete list of all the risks clients should consider.

**Cybersecurity Risk:** The computer systems, networks and devices used by DWR and service providers to us and our clients to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches. Despite the various protections utilized, systems, networks or devices potentially can be breached. A client could be negatively impacted as a result of a cybersecurity breach.

Cybersecurity breaches can include unauthorized access to systems, networks, or devices; infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow or otherwise disrupt operations, business processes or website access or functionality. Cybersecurity breaches may cause disruptions and impact business operations, potentially resulting in financial losses to a client; impediments to trading; the inability by us and other service providers to transact business; violations of applicable privacy and other laws; regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs, as well as the inadvertent release of confidential information.

Similar adverse consequences could result from cybersecurity breaches affecting issuers of securities in which a client invests; governmental and other regulatory authorities; exchange and other financial market operators, banks, brokers, dealers and other financial institutions and other parties. In addition, substantial costs may be incurred by these entities in order to prevent any cybersecurity breaches in the future.

Market Disruption, Health Crisis, Terrorism and Geopolitical Risk: DWR is subject to the risk that war, terrorism, global health crises or similar pandemics, and other related geopolitical events increase short-term market volatility and may have adverse long-term effects on world economics and markets generally. These risks have previously led and may lead in the future to adverse effects on issuers of securities and the value of client's investments. At such times, DWR's exposure to a number of other risks described in this section can increase.

#### Item 9 - Disciplinary Information

Registered investment advisors are required to disclose any material facts regarding any legal or disciplinary actions that would be material to your evaluation of the investment advisor and each investment advisor representative providing investment advice to you. We have no information of this type to report.

#### Item 10 - Other Financial Industry Activities and Affiliations

Mr. Dunham is also a principal of Dunham Associates CPAs, Inc. ("DA"), a firm that provides tax preparation services. DA provides tax services to both individual, small businesses and corporate clients and tax planning and book keeping services to both individuals and businesses. Many of our clients are also clients of DA. Mr. Dunham expects to spend approximately 95% of his time working with accounting clients.

You are under no obligation to use the services of DA for any accounting or tax work recommended by us.

Because of custody rules governing investment advisors, we cannot provide advisory services to individuals who have provided DA with the authority to sign checks, pay bills, or transfer funds on their behalf.

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

##### Code of Ethics

We have adopted a set of enforceable guidelines (Code of Ethics), which describes unacceptable conduct by DWR and our associated persons. Summarized, this Code of Ethics prohibits us from:

- placing our interests before yours,
- using non public information gathered when providing services to you for our own gains, or
- engaging in any act, practice or course of business that is, or might be considered, fraudulent, deceptive, manipulative, or in violation of any applicable law, rule or regulation of a governmental agency.

Please contact us if you would like to receive a full copy of this Code of Ethics.

#### Personal Trading for Associated Persons

We may buy or sell some of same securities for you that we already hold in our personal account. We may also buy for our personal account some of the same securities that you already hold in your account. It is our policy not to permit our associated persons (or their immediate relatives) to trade in a way that takes advantage of price movements caused by your transactions.

We may restrict trading for a particular security for our accounts or those of our associated person if there is a pending trade in that security in a client account. Trades for our accounts (and those of our associated persons) will be placed as part of a block trade with client trades, or individually after client trades have been completed. Additional information about block trades is provided in the Aggregation of Orders section of "Item 12: Brokerage Practices." When our trades are placed after our client trades, we may receive a better or worse price than that received by the client.

All persons associated with us are required to report all personal securities transactions to us quarterly.

#### Item 12 - Brokerage Practices

##### Selection of Brokers

DWR has an arrangement with National Financial Services LLC and Fidelity Brokerage Services LLC (collectively, and together with all affiliates, "Fidelity") through which Fidelity provides DWR with "institutional platform services." The institutional platform services include, among others, brokerage, custody, and other related services. Fidelity's institutional platform services that assist DWR in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Fidelity also offers other services intended to help DWR manage and further develop its advisory practice. Such services include, but are not limited to, performance reporting, financial planning, contact management systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom DWR may contract directly.

DWR is independently operated and owned and is not affiliated with Fidelity.

Fidelity generally does not charge its advisor clients separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Fidelity or that settle into Fidelity accounts (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity provides access to many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges.

##### Aggregation of Orders

DWR primarily utilizes open-ended mutual funds in your investment portfolios, which cannot be block traded. In some cases exchange traded funds or other securities may be used, or present, in individual client portfolios. We do not aggregate (block) trades for any client accounts.

## Directed Brokerage

You may instruct us to execute any or all securities transactions for your account with or through one or more broker/dealers designated by you. In these cases, you are responsible for negotiating the terms and conditions (including, but not limited to, commission rates) relating to all services to be provided by the broker/dealers and you are satisfied with the terms and conditions. We have no responsibility for obtaining the best prices or any particular commission rates for transactions with or through the broker/dealer in these situations. You recognize that you may not obtain rates as low as you might otherwise obtain if we had discretion to select broker/dealers other than those chosen by you. If you would like us to cease executing transactions with or through the designated broker/dealer you must notify us in writing.

## Soft Dollars

"Soft dollars" are typically generated when an investment advisor enters into an agreement with an executing broker to receive a portion of the commissions generated by the advisor's client trades. The soft dollars are allocated to the investment advisor and can then be used to purchase items or services. The investment advisor has a fiduciary duty to its clients to obtain best execution, on an overall basis, for any securities transactions.

We do not use soft dollars as described above. However, the receipt of goods and/or services from a third party in connection with providing advice to clients could be seen as "soft dollars." The additional services we receive from custodians, as disclosed in Item 14 below, would fall under this description of soft dollars.

## Trade Errors

In all circumstances involving trade errors caused by DWR, clients are "made whole." If the correction of the trade error by the firm results in a loss, DWR is responsible for that loss. DWR does not retain any client trade error gains.

In instances where multiple trades are corrected at the same time for the same event, the firm will net the results of each correction against each other. Gains received during these corrections may be used to offset losses resulting from other corrections within the total trade error correction.

Outside of these cases, DWR donates trade error gains to charity, or the gain is retained in the Client account, depending on the custodian's policies or client direction.

## Item 13- Review of Accounts

On a quarterly basis D. Rex Rousselot, Managing Member reviews current holdings in relationship with investment model portfolios. Portfolios are rebalanced annually. We provide quarterly performance reports which include the after-fee rates of return. This report also includes both time-weighted and internal rate of returns.

Financial plans are reviewed on an annual basis. This review is done in relation to the goals of the original plan. The differences are reviewed with the client and changes are made as deemed necessary. These reviews are performed by D. Rex Rousselot, Managing Member

## Item 14 - Client Referrals and Other Compensation

### Other Compensation

We may receive from Fidelity, without cost to us, computer software and related systems support, which allow us to better monitor client accounts maintained at Fidelity. DWR may receive the software and related support without cost because we render investment management services to clients that maintain assets at Fidelity.

Specifically, we may receive the following benefits from Fidelity through the Fidelity Institutional Wealth Services Group:

- receipt of duplicate client confirms and bundled duplicate statements;
- access to a trading desk that exclusively services its Institutional Wealth Services Group 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.

#### Client Referrals

We do not directly or indirectly compensate anyone for client referrals.

#### Item 15 - Custody

If you give us authority to deduct our fees directly from your separately managed account, we have custody of those assets. In order to avoid additional regulatory requirements in these cases, we follow the procedures outlined in "Item 5: Fees and Compensation." You will also receive quarterly statements directly from custodian of the account that details all transactions in the account. They will be sent to the email or postal mailing address you provided to the broker/dealer. You should carefully review those statements promptly when you receive them. We also urge you to compare these account statements to the periodic portfolio reports you will receive from us.

At no time do we accept physical custody of client assets.

#### Item 16 - Investment Discretion

For discretionary investment management accounts, DWR requires that the authority to determine which securities and the amounts of securities that are bought or sold be provided in writing. Any limitations on this discretionary authority shall be included in this written authority statement. Clients can change or amend these limitations, but such amendments need to be submitted to DWR in writing.

In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. When selecting securities and determining amounts, DWR observes the stated investment policies, limitations, and restrictions of the client for which it advises.

#### Item 17 - Voting Client Securities

DWR does not accept the authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for all and any securities maintained in client accounts. Clients will receive applicable proxies directly from the issuer of securities held in clients' investment portfolio accounts. DWR, however, may provide advice to clients regarding clients' voting of proxies.

DWR will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held or previously were held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients can direct DWR to transmit copies of class action notices to the client or a third party. Upon client direction, DWR will make reasonable efforts to forward such notices in a timely manner.

#### Item 18 - Financial Information

We do not charge or solicit pre-payment of more than \$1,200 in fees per client six or months in advance. We have never filed for bankruptcy and are not aware of any financial conditions that are reasonably likely to impair our ability to meet our contractual obligations to clients.