

Griffiths, Dreher & Evans, P.S., CPAs  
**INVESTMENT ADVISORS | CPAs**  
Business Valuation | Business Sales | Investment Management

# Disclosure Brochure

## FORM ADV, PART 2

December 2023

This Brochure provides information about the qualifications and business practices of Griffiths, Dreher & Evans, P.S., CPAs. If you have any questions about the contents of this Brochure, please contact us at (509) 326-4054. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Griffiths, Dreher & Evans, P.S., CPAs also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), IARD #142448.

Griffiths, Dreher & Evans, P.S. is a Registered Investment Adviser and Certified Public Accounting firm. Registration of an Investment Adviser does not imply any level of skill or training.

### **ITEM 2 – MATERIAL CHANGES**

In October 2023 the firms' Managing Shareholder and Chief Compliance Office Thomas M Griffiths passed away. He has been replaced as shareholder by Roxanne M. Griffiths and as Chief Compliance Officer by Alec T. Griffiths.

Griffiths, Dreher & Evans, P.S., CPAs moved from its prior location at 906 West Sprague Ave Spokane, WA 99201, to its new location at 408 North Mullan Rd Spokane Valley, WA 99206.

Our custodian, TD Ameritrade, was acquired by Charles Schwab & Co., Inc. and as a result, Griffiths, Dreher & Evans, P.S., CPAs has entered into an Investment Advisor Services Agreement with Charles Schwab & Co., Inc., for the transition of custodian responsibilities on our accounts to Charles Schwab & Co., Inc from TD Ameritrade in accordance with the acquisition.

The above changes are only those material changes incurred since the last update of our brochure, March 2023.

GRIFFITHS DREHER & EVANS, P.S., CPAs | REGISTERED INVESTMENT ADVISER  
408 North Mullan Rd – Spokane Valley, WA 99206  
P- 509-326-4054 F-509-326-4216 [www.Grifco.com](http://www.Grifco.com)

### ITEM 3 – TABLE OF CONTENTS

ITEM 4 – ADVISORY BUSINESS.....	3
ITEM 5 – FEES AND COMPENSATION .....	3
ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT .....	5
ITEM 7 – TYPES OF CLIENTS .....	5
ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS .....	5
ITEM 9 – DISCIPLINARY INFORMATION .....	6
ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS .....	6
ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING.....	6
ITEM 12 – BROKERAGE PRACTICES .....	7
ITEM 13 – REVIEW OF ACCOUNTS .....	8
ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION .....	8
ITEM 15 - CUSTODY .....	9
ITEM 16 – INVESTMENT DISCRETION .....	9
ITEM 17 – VOTING CLIENT SECURITIES .....	10
ITEM 18 – FINANCIAL INFORMATION .....	10

## ITEM 4 – ADVISORY BUSINESS

**About Our Firm:** Griffiths Dreher & Evans, P.S., CPAs is a SEC Registered Investment Adviser and Licensed Certified Public Accounting Firm (licensed in Washington 9/01/1992). Our principal owners are Deanna M. Dreher, J. Shawn Coleman, Brett G. Smith, and Roxanne M. Griffiths. Our principals and the majority of our investment representatives are Certified Public Accountants. Our advisory focus is on business owners, retired entrepreneurs' and high net worth individuals. These groups will benefit most from our advisory service because their planning needs and opportunities are complex and because we are both CPAs and Financial Advisors, we are able to provide coordinated management of business and personal financial affairs.

**Discretionary Investment Management Services:** Our firm provides Discretionary Investment Management Services and will act as fee-only investment advisor for all assets under discretionary management. Griffiths, Dreher & Evans, P.S., CPAs (GDE) receives no commissions, referral fees, finder's fees or other cash compensation or benefits.

GDE works with clients to determine investment objectives and investor risk profile and design a written Investment Plan. The Investment Plan together with our Investment Policy Statement will serve as a basis for approaching investment decisions. GDE uses investment and portfolio allocation software to evaluate alternative portfolio designs and will assist the client in selecting investment strategies that are consistent with the client's Investment Plan. GDE may evaluate the client's existing investments with respect to the client's Investment Plan and individual performance. GDE may work with a client to develop a transition plan in order to move from the client's existing allocation to the desired asset allocation. GDE will monitor the performance of the assets as well as the asset allocation strategy and will hold regular review meetings with the client and produce quarterly performance reports for the client.

Discretionary Investment Management Services include the following:

1. Analysis of client financial condition
2. Investment recommendations to achieve the client's objectives
3. Implementation of investment recommendations; and
4. Monitoring of investment performance

As of December 31, 2022, GDE Managed \$139,287,510 of client assets. \$139,287,510 are managed on a discretionary basis and 0 are managed on a non-discretionary basis.

**WRAP Fee Programs:** GDE does not participate in wrap fee programs. GDE has full discretionary authority, and clients may not impose restrictions on investing in certain securities or types of securities.

**Accounting Services:** Outside of our Investment Advisor Services, GDE provides CPA/accounting services, however GDE and/or individuals of the firm do not have signatory authority for client's accounts, nor does GDE and/or individuals of the firm have custody over client's funds.

## ITEM 5 – FEES AND COMPENSATION

In all instances, adviser will send the client a written or electronic invoice, including the fee, the formula used to calculate the fee, the fee calculation itself, the time period covered by the fee, and, if applicable, the amount of assets under management on which the fee was based. Also, adviser will include the name of the custodian(s) on the fee invoice. Adviser will send these to the client in advance of the request for payment or payment of adviser's advisory fees. We urge the client to compare this information with the fees listed in the account statement.

**Discretionary Investment Management Services:** Investment Management Services are provided on a discretionary basis. Fees are based on the following schedule (accounts are aggregated before performing the calculation):

<u>Assets Under Management</u>	<u>Per Quarter</u>	<u>Annualized</u>
First \$1,000,000	0.3125%	1.25%
\$1,000,001 to \$2,500,000	0.2500%	1.00%
\$2,500,001 to \$5,000,000	0.2000%	0.80%
\$5,000,001 to \$10,000,000	0.1750%	0.70%
\$10,000,001 and over	0.1250%	0.50%

All fees paid to GDE for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. Additionally, the asset custodian may charge clients a transaction fee on purchases or sales of mutual funds and other securities. A client could invest in mutual funds directly, without the services of GDE. In that case, the clients would not receive the services provided by GDE which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Clients will incur brokerage and other transaction costs. See item 12, "Brokerage Practices."

In some circumstances, Discretionary Investment Management Service fees may be negotiable or may be waived. Discretionary Investment Management Service fees may be modified at the discretion of the advisor when special conditions or complexities exist, and the fee is agreed upon at the time of the engagement.

The Discretionary Investment Management Service Agreement may be cancelled at any time for any reason upon receipt of written notice. Upon termination of any account, the pro-rated portion of any prepaid, unearned fees will be promptly refunded. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement. The Adviser reserves the right to terminate this Agreement at its' discretion upon written notice.

The first payment is due and payable on the first day of the calendar quarter following the quarter in which execution of the Agreement takes place and will be assessed pro-rata based on the value of the portfolio on the last day of the contract execution quarter. Subsequent payments are due quarterly in advance and will be assessed on the first day of each calendar quarter based on the value of the portfolio as of the last day of the previous calendar quarter, including a pro-rata-based assessment of the previous calendar quarter's inflows and outflows.

GDE will request authority from the client to receive quarterly payments directly from the client's account held by an independent custodian. Clients may provide written limited authorization to GDE to withdraw fees from the account. The client understands that the following criteria must be met when payment is withdrawn by the custodian and paid to GDE under the terms of this authorization:

1. The client provides written authorization permitting the fees to be paid directly from the Client's account held by the independent custodian and the authorization is limited to withdrawing contractually agreed upon investment advisor fees.
2. The advisor must notify the Client, in writing before or on the proposed date of withdrawal of the exact amount of the proposed withdrawal and the specific manner or basis on which the fee has been calculated.
3. The frequency of the withdrawal shall be specified in the written authorization/agreement.
4. The custodian of the account shall be advised in writing of the limitation of the Adviser's access to the account.
5. The custodian agrees to send to the Client, a statement at least quarterly, indicating all amounts disbursed to the Adviser.

Fees are billed quarterly, in advance, and are based upon the market value of the included assets on the last day of the previous fee period and are due the following business day. GDE shall provide a billing notice to clients and payment of total fees shall be made, as the case may be. An increase or decrease to the fee, called a true-up adjustment, is calculated at the end of each quarter to reflect fluctuations in account value during the quarter due to deposits and withdrawals. The true-up for the quarter is reflected separately in the subsequent quarter fee calculation. If an account is closed during the quarter and a reduction of fees is due from the true-up adjustment, it will be credited to other account fees or refunded by check if other account fees are insufficient to utilize the credit.

Lower fees for comparable services may be available from other sources.

GDE 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.

## **ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

GDE calculates all fees as described in Item 5 above and fees are not charged on the basis of a share of capital gains or capital appreciation of the funds of the Client. GDE does not charge performance-based fees.

## **ITEM 7 – TYPES OF CLIENTS**

GDE provides advisory services to individuals, business owners, businesses, trusts, and to CPA clientele. GDE does not require a minimum account balance to open or maintain an account.

## **ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS**

GDE utilizes a fundamental security analysis method. GDE's investment strategy consists of the following five key concepts:

1. Utilize diversification effectively to reduce risk - Holding a number of different stocks does not necessarily make a diversified portfolio. A portfolio with investments sharing similar risk factors by belonging to the same industry group or asset class is not diversification at all.
2. Dissimilar price movement diversification enhances returns - Two equal investments can have the same arithmetic rate of return but have very different ending values because of volatility. A portfolio should be designed so that it has as little volatility as necessary to achieve specific goals.
3. Employ asset class investing - Four major attributes of institutional asset class funds are lower operating expenses, lower turnover resulting in lower costs, lower turnover resulting in lower taxes, and consistently maintained market segments.
4. Global diversification reduces risk - American equity markets and international markets do not move together. Individual stocks of companies around the world with similar risk have the same expected rate of return. However, they don't get there in the same manner or at the same time.
5. Design portfolios that are efficient - Modern Portfolio Theory maintains there are combinations of investments exhibiting an optimal risk/reward trade-off which form the efficient frontier line.

Investing in securities involves risk of loss that clients should be prepared to bear. The investment solutions GDE recommends to clients generally consist of Exchange- Traded Funds (ETFs) and Mutual Funds. As with any investing

vehicle, there are risks. Some potential risks to be aware of may include market fluctuations and/or credit risk. The stocks tracked within an ETF or Mutual Fund are subject to the same risks as traditional equities. If the component stocks decline due various market factors, the value of the ETF or Mutual Fund will decline. Fixed-income based ETFs or Mutual Funds are subject to the same risks endured by bond traders, such as the interest-rate environment. International ETFs or Mutual Funds run the risk of capital loss due to currency fluctuations or instability in the nations followed by the ETF or Mutual Fund.

## **ITEM 9 – DISCIPLINARY INFORMATION**

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

## **ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

GDE's investment advisors are also engaged in a profession other than giving investment advice, they are CPAs. CPA services are available to GDE's clients for a separate fee. This profession takes up approximately fifty percent of their work week.

Deanna M. Dreher, J. Shawn Coleman, and Brett Smith are shareholder CPAs of Griffiths, Dreher & Evans, P.S., CPAs a public accounting firm and registered investment adviser. Some public accounting clients of GDE may become advisory clients of the company and vice-versa.

GDE nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

GDE nor any of its management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

GDE nor any of its management persons recommend or select other investment advisers for their clients or receive compensation directly or indirectly from those advisers or have other business relationships with those advisers that creates a material conflict of interest.

Because GDE offers CPA/accounting services, GDE is continually monitoring for conflicts of interest and only accepts engagements where GDE believes they can be fiduciaries and be objective where there is a conflict. As needed, GDE discloses such conflicts to all parties in writing.

GDE and/or individuals of the firm do not have signatory authority for client's accounts, nor does GDE and/or individuals of the firm have custody over client's funds.

## **ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

GDE's chief compliance officer is Alec T. Griffiths.

GDE's investment advisor reps may buy or sell for themselves investment products recommended to clients. There is no conflict of interest as the securities are widely held and publicly traded and the reps are too small an investor/adviser

to affect the market. In addition, client interests are always placed before advisors own interests. GDE has adopted a Code of Ethics which sets forth high ethical standards of business conduct that GDE requires of its adviser, including compliance with applicable federal securities laws. Our Code of Ethics also includes policies and procedures for the review of quarterly securities transaction reports as well as initial and annual securities holding reports that must be submitted by GDE's covered person. Among other things GDE's Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also includes oversight, enforcement and recordkeeping provisions. A copy of GDE's Code of Ethics is available to GDE's advisory clients upon request to the Chief Compliance Officer at GDE's principal office address.

GDE maintains an investment policy relative to personal securities transactions. This investment policy is part of GDE's overall Code of Ethics, which serves to establish a standard of business conduct for all of GDE's Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request to the Chief Compliance Officer at GDE's principal office address.

In accordance with Section 204A of the Investment Advisers Act of 1940, GDE also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by GDE or any person associated with GDE.

Neither GDE nor any related person of GDE recommends, buys, or sells for client accounts, securities in which GDE or any related person of GDE has a material financial interest.

GDE and/or representatives of GDE may buy or sell securities that are also recommended to clients. This practice may create a situation where GDE and/or representatives of GDE are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if GDE did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of GDE's clients) and other potentially abusive practices.

GDE has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of GDE's "Access Persons." GDE's securities transaction policy requires that an Access Person of GDE must provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date GDE selects; provided, however that at any time that GDE has only one Access Person, he or she shall not be required to submit any securities report described above.

GDE and/or representatives of GDE may buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where GDE and/or representatives of GDE are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above in Item 11 C, GDE has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of GDE's Access Persons.

## **ITEM 12 – BROKERAGE PRACTICES**

GDE will require that, as a condition for establishing a discretionary relationship, that the client opens an account with TD Ameritrade or Charles Schwab & Co., Inc.

The factors evaluated in selection of TD Ameritrade and Charles Schwab & Co., as independent custodian include appropriateness of fees charged, experience and history of management, ease of account and appropriateness of investment options provided. GDE does not receive soft dollars from the custodian.

To the extent that the Registrant provides investment management services to its clients, the transactions for each client account generally will be effected independently, unless the Registrant decides to purchase or sell the same securities for several clients at approximately the same time. The Registrant may (but is not obligated to) combine or “bunch” such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Registrant’s client’s 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 be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. The Registrant shall not receive any additional compensation or remuneration as a result of such aggregation.

GDE is not affiliated with the brokerage firms. The brokers do not supervise GDE, its agents or activities.

GDE does not receive client referrals from a broker-dealer or third party, and therefore this is not a consideration within GDE’s broker-dealer selection process. GDE does not permit a client to direct-brokerage.

## **ITEM 13 – REVIEW OF ACCOUNTS**

GDE continuously reviews accounts and formally reviews accounts on a quarterly basis by the assigned Investment Advisor Representative. The review process contains each of the following elements: assess client goals and objectives, evaluate the strategy which has been employed, and monitor the portfolio.

Individuals reviewing client accounts are Deanna M. Dreher, Registered Investment Adviser Representative, J. Shawn Coleman, Registered Investment Adviser Representative, Susan M. Marshall, Registered Investment Adviser Representative, Todd W. Evans, Registered Investment Adviser Representative, Brett G. Smith, Registered Investment Adviser Representative, and Gregory T. Kelly, Registered Investment Adviser Representative, Eric J. Blazekovic, Registered Investment Adviser Representative, Cameron D. Scott, Registered Investment Adviser Representative, Kelly N. Klossner, Registered Investment Adviser Representative, Alec T. Griffiths, Registered Investment Adviser Representative, and Raymond J. Eichten, Registered Investment Adviser Representative.

GDE prepares quarterly investment reports, including holdings, performance, and related fees, for clients which discuss account performances. These reports are in addition to and separate from the custodial account statements that clients will receive directly from the custodian. Clients should carefully compare the account statements they receive from the qualified custodian with any reports or correspondence you will receive from GDE.

In addition to the quarterly review, an account review may be triggered by specific client request, change in client goals and objectives, and an imbalance in portfolio allocation. There are no different levels of review.

## **ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION**

GDE does not receive any economic benefit (including commissions, equipment, or non-research services) from a non-client in connection with giving advice to clients.

GDE does not directly or indirectly compensate any person for client referrals.



## ITEM 15 - CUSTODY

GDE only has custody over client assets to the extent we request the client's custodian to deduct advisory fees directly from client accounts. Client consent for deduction of advisory fees directly from client accounts must be authorized in the advisory contract. The following procedures are designed to help ensure GDE does not inadvertently obtain further custody (other than by the deduction of advisory fees noted above) over client assets:

1. GDE will obtain prior written authorization from the Client before deducting fees directly from the Client's account;
2. GDE will not hold client securities in GDE's name or in bearer form;
3. Proceeds from the redemption of Client securities may not be directed to GDE;
4. GDE may not have signatory power over a Client's checking or custodial account;
5. An employee of GDE may not serve as trustee over a Client's account, unless the Client is an immediate family member of the employee; and
6. All wires from Client custodial accounts to outside (i.e., non-client) accounts must be accompanied by Client authorization.

Under securities regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Schwab (TD Ameritrade) to deduct our advisory fees directly from your account. Schwab (TD Ameritrade) maintains actual custody of your assets. You will receive account statements directly from Schwab (TD Ameritrade) at least quarterly. They will be sent to the email or postal mailing address you provided to Schwab (TD Ameritrade). You should carefully review those statements promptly when you receive them. We also urge you to compare Schwab's (TD Ameritrade's) account statements with the periodic account statements you will receive from us.

All client assets will be held by a qualified custodian, which may include a broker-dealer, bank or foreign financial institution. GDE will not route original custodial statements to our clients on behalf of a custodian. The custodian should deliver client account statements directly to the client. GDE may assist the client in preparing paperwork for a new custodial account, but the client is required to authorize any new custodial account.

GDE may handle or forward checks clearly made payable to a third party, such as the client's independent custodian.

GDE may not handle or forward any other client check or security certificate received by the firm. All such instruments must be returned to a client or forwarded to the custodian within 24 hours and may not be forwarded to any other party other than the client or a client representative.

GDE is not affiliated with the custodian. The custodian does not supervise GDE, its agents or activities.

GDE provides CPA/accounting services, however GDE and/or individuals of the firm do not have signatory authority for client's accounts, nor does GDE and/or individuals of the firm have custody over client's funds.

## ITEM 16 – INVESTMENT DISCRETION

When providing asset management services, GDE maintains trading authorization over your Account and can provide management services on a discretionary basis.

When discretionary authority is granted, GDE has the authority to determine the type of securities and the amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction. GDE also maintains discretionary authority to select the broker dealer or custodian used to hold client accounts.

You will have the ability to place reasonable restrictions on the types of investments that may be purchased in your Account. You may also place reasonable limitations on the discretionary power granted to GDE so long as the limitations are specifically set forth or included as an attachment to the client agreement.

When selecting securities and determining amounts, GDE observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, GDE's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made. Investment guidelines and restrictions must be provided to GDE in writing.

## **ITEM 17 – VOTING CLIENT SECURITIES**

As a matter of firm policy, GDE does not vote proxies on behalf of clients. Clients are responsible for voting their own proxies. However, GDE may provide clients with consulting assistance regarding proxy issues.

## **ITEM 18 – FINANCIAL INFORMATION**

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

GDE will require individuals providing advice to be properly licensed and registered in the states which the individuals are conducting investment advisory business.

GDE does not require or solicit prepayment of \$1,200 or more, six months or more in advance.

### **Business Continuity Plan:**

GDE has a business continuity and contingency plan in place designed to respond to significant business disruptions. These disruptions can be both internal and external. Internal disruptions will impact our ability to communicate and do business, such as a fire in the office building. External disruptions will prevent the operation of the securities markets or the operations of a number of firms, such as earthquakes, wildfires, hurricanes, terrorist attack or other wide-scale, regional disruptions.

Our continuity and contingency plan has been developed to safeguard employees' lives and firm property, to allow a method of making financial and operational assessments, to quickly recover and resume business operations, to protect books and records, and to allow clients to continue transacting business.

The plan includes the following:

- Alternate locations to conduct business;
- Hard and electronic back-ups of records;
- Alternative means of communications with employees, clients, critical business constituents and regulators; and
- Details on the firms' employee succession plan

Our business continuity and contingency plan is reviewed and updated on a regular basis to ensure that the policies in place are sufficient and operational.

## **Eric J. Blazekovic**

CRD # 7207691  
Griffiths, Dreher & Evans, P.S., CPAs  
408 N Mullan Rd Spokane Valley, WA 99206  
(509) 326-4054 [www.grifco.com](http://www.grifco.com)  
Brochure Supplement  
Date: December 2023

**This Brochure Supplement provides information about Eric J. Blazekovic that supplements the Griffiths, Dreher & Evans, P.S., CPAs Brochure. You should have received a copy of that Brochure. Please contact Alec T. Griffiths, Chief Compliance Officer, if you did *not* receive Griffiths, Dreher & Evans, P.S., CPAs Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Eric J. Blazekovic is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

### **Eric J. Blazekovic (DOB 03/10/1995)**

#### **Education Experience (Post-High School):**

09/2013 – 06/2018: Eastern Washington University      BAB – Professional Accounting & Finance

#### **Business Experience (Preceding 5 years):**

08/2017 – Present:	IAR	Griffiths, Dreher & Evans, P.S., CPAs
12/2016 – 08/2017:	Bookkeeper	MBD Creations
09/2013 – 06/2018:	Student	Eastern Washington University

#### **Disciplinary Information**

Eric J. Blazekovic has no legal or disciplinary events to report.

#### **Other Business Activities**

The supervised person is not actively engaged in any other investment-related businesses or occupations.

The supervised person is also actively engaged as a CPA which provides a substantial source of the supervised person's income and involves a substantial amount of the supervised person's time.

Because GDE offers CPA/accounting services, GDE is continually monitoring for conflicts of interest and only accepts engagements where GDE believes they can be fiduciaries and be objective where there is a conflict. As needed, GDE discloses such conflicts to all parties in writing. Eric J. Blazekovic does not have any conflicts of interest to report.

#### **Additional Compensation**

Eric J. Blazekovic does not receive an economic benefit from anyone who is not a client for providing advisory services.

#### **Supervision**

Alec T. Griffiths is the Chief Compliance Officer of Griffiths, Dreher & Evans, P.S., CPAs. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives including Eric J. Blazekovic. Alec T. Griffiths can be contacted at 509-326-4054.

**J. Shawn Coleman**

CRD # 5429369  
Griffiths, Dreher & Evans, P.S., CPAs  
408 N Mullan Rd Spokane Valley, WA 99206  
(509) 326-4054 www.grifco.com  
Brochure Supplement  
Date: December 2023

**This Brochure Supplement provides information about J. Shawn Coleman that supplements the Griffiths, Dreher & Evans, P.S., CPAs Brochure. You should have received a copy of that Brochure. Please contact Alec T. Griffiths, Chief Compliance Officer, if you did *not* receive Griffiths, Dreher & Evans, P.S., CPAs Brochure or if you have any questions about the contents of this supplement.**

**Additional information about J. Shawn Coleman is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**J. Shawn Coleman (DOB 06/05/1973)**

**Education Experience (Post-High School):**

09/1999 – 12/2003: Eastern Washington University      BAB – Professional Accounting, Economics, & Finance

**Business Experience (Preceding 5 years):**

11/2005 – Present: IAR      Griffiths, Dreher & Evans, P.S., CPAs

**Disciplinary Information**

J. Shawn Coleman has no legal or disciplinary events to report.

**Other Business Activities**

The supervised person is not actively engaged in any other investment-related businesses or occupations.

The supervised person is also actively engaged as a CPA which provides a substantial source of the supervised person’s income and involves a substantial amount of the supervised person’s time.

Because GDE offers CPA/accounting services, GDE is continually monitoring for conflicts of interest and only accepts engagements where GDE believes they can be fiduciaries and be objective where there is a conflict. As needed, GDE discloses such conflicts to all parties in writing. J. Shawn Coleman does not have any conflicts of interest to report.

**Additional Compensation**

J. Shawn Coleman does not receive an economic benefit from anyone who is not a client for providing advisory services.

**Supervision**

Alec T. Griffiths is the Chief Compliance Officer of Griffiths, Dreher & Evans, P.S., CPAs. He is responsible for overseeing and enforcing the firm’s compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives including Brett G. Smith. Alec T. Griffiths can be contacted at 509-326-4054.

**Deanna M. Dreher**

CRD # 5245345  
Griffiths, Dreher & Evans, P.S., CPAs  
408 N Mullan Rd Spokane Valley, WA 99206  
(509) 326-4054 www.grifco.com  
Brochure Supplement  
Date: December 2023

**This Brochure Supplement provides information about Deanna M. Dreher that supplements the Griffiths, Dreher & Evans, P.S., CPAs Brochure. You should have received a copy of that Brochure. Please contact Alec T. Griffiths, Chief Compliance Officer, if you did *not* receive Griffiths, Dreher & Evans, P.S., CPAs Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Deanna M. Dreher is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Deanna M. Dreher (DOB 12/09/1973)**

**Education Experience (Post-High School):**

09/1992 – 06/1996: Eastern Washington University      BAB – Professional Accounting

**Business Experience (Preceding 5 years):**

11/1999 – Present: IAR      Griffiths, Dreher & Evans, P.S., CPAs

**Disciplinary Information**

Deanna M. Dreher has no legal or disciplinary events to report.

**Other Business Activities**

The supervised person is not actively engaged in any other investment-related businesses or occupations.

The supervised person is also actively engaged as a CPA and is engaged in a residential real estate rental and commercial property management company which provides a substantial source of the supervised person’s income and involves a substantial amount of the supervised person’s time.

Because GDE offers CPA/accounting services, GDE is continually monitoring for conflicts of interest and only accepts engagements where GDE believes they can be fiduciaries and be objective where there is a conflict. As needed, GDE discloses such conflicts to all parties in writing. Deanna M. Dreher does not have any conflicts of interest to report.

**Additional Compensation**

Deanna M. Dreher does not receive an economic benefit from anyone who is not a client for providing advisory services.

**Supervision**

Alec T. Griffiths is the Chief Compliance Officer of Griffiths, Dreher & Evans, P.S., CPAs. He is responsible for overseeing and enforcing the firm’s compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives including Deanna M. Dreher. Alec T. Griffiths can be contacted at 509-326-4054.

## **Raymond J. Eichten**

CRD # 7499555

Griffiths, Dreher & Evans, P.S., CPAs  
408 N Mullan Rd Spokane Valley, WA 99206  
(509) 326-4054 [www.grifco.com](http://www.grifco.com)

Brochure Supplement

Date: December 2023

**This Brochure Supplement provides information about Raymond J. Eichten that supplements the Griffiths, Dreher & Evans, P.S., CPAs Brochure. You should have received a copy of that Brochure. Please contact Alec T. Griffiths, Chief Compliance Officer, if you did *not* receive Griffiths, Dreher & Evans, P.S., CPAs Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Raymond J. Eichten is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

### **Raymond J. Eichten (DOB 10/13/1998)**

#### **Education Experience (Post-High School):**

09/2016 – 06/2020: Eastern Washington University      BAB – Professional Accounting & Finance

#### **Business Experience (Preceding 5 years):**

09/2021 – Present:	IAR	Griffiths, Dreher & Evans, P.S., CPAs
07/2020 – 08/2021:	Staff Accountant	Leffel, Otis & Warwick, P.S., CPAs
01/2019 – 06/2020:	Tax Intern	Stewart-Longhurst, P.S., CPAs
09/2016 – 06/2020:	Student	Eastern Washington University

#### **Disciplinary Information**

Raymond J. Eichten has no legal or disciplinary events to report.

#### **Other Business Activities**

The supervised person is not actively engaged in any other investment-related businesses or occupations.

The supervised person is also actively engaged as a CPA which provides a substantial source of the supervised person's income and involves a substantial amount of the supervised person's time.

Because GDE offers CPA/accounting services, GDE is continually monitoring for conflicts of interest and only accepts engagements where GDE believes they can be fiduciaries and be objective where there is a conflict. As needed, GDE discloses such conflicts to all parties in writing. Raymond J. Eichten does not have any conflicts of interest to report.

#### **Additional Compensation**

Raymond J. Eichten does not receive an economic benefit from anyone who is not a client for providing advisory services.

#### **Supervision**

Alec T. Griffiths is the Chief Compliance Officer of Griffiths, Dreher & Evans, P.S., CPAs. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives including Raymond J. Eichten. Alec T. Griffiths can be contacted at 509-326-4054.

## **Todd W. Evans**

CRD # 5245335

Griffiths, Dreher & Evans, P.S., CPAs  
408 N Mullan Rd Spokane Valley, WA 99206  
(509) 326-4054 [www.grifco.com](http://www.grifco.com)  
Brochure Supplement  
Date: December 2023

**This Brochure Supplement provides information about Todd W. Evans that supplements the Griffiths, Dreher & Evans, P.S., CPAs Brochure. You should have received a copy of that Brochure. Please contact Alec T. Griffiths, Chief Compliance Officer, if you did *not* receive Griffiths, Dreher & Evans, P.S., CPAs Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Todd W. Evans is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

### **Todd W. Evans (DOB 03/16/1962)**

#### **Education Experience (Post-High School):**

09/1994 – 06/1998: Eastern Washington University      BAB – Professional Accounting

#### **Business Experience (Preceding 5 years):**

06/1997 – Present: IAR      Griffiths, Dreher & Evans, P.S., CPAs

#### **Disciplinary Information**

Todd W. Evans has no legal or disciplinary events to report.

#### **Other Business Activities**

The supervised person is not actively engaged in any other investment-related businesses or occupations.

The supervised person is also actively engaged as a CPA which provides a substantial source of the supervised person's income and involves a substantial amount of the supervised person's time.

Because GDE offers CPA/accounting services, GDE is continually monitoring for conflicts of interest and only accepts engagements where GDE believes they can be fiduciaries and be objective where there is a conflict. As needed, GDE discloses such conflicts to all parties in writing. Todd W. Evans does not have any conflicts of interest to report.

#### **Additional Compensation**

Todd W. Evans does not receive an economic benefit from anyone who is not a client for providing advisory services.

#### **Supervision**

Alec T. Griffiths is the Chief Compliance Officer of Griffiths, Dreher & Evans, P.S., CPAs. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives including Todd W. Evans. Alec T. Griffiths can be contacted at 509-326-4054.

## **Alec T. Griffiths**

CRD # 7362569

Griffiths, Dreher & Evans, P.S., CPAs  
408 N Mullan Rd Spokane Valley, WA 99206  
(509) 326-4054 [www.grifco.com](http://www.grifco.com)  
Brochure Supplement  
Date: December 2023

**This Brochure Supplement provides information about Alec T. Griffiths that supplements the Griffiths, Dreher & Evans, P.S., CPAs Brochure. You should have received a copy of that Brochure. Please contact Alec T. Griffiths, Chief Compliance Officer, if you did *not* receive Griffiths, Dreher & Evans, P.S., CPAs Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Alec T. Griffiths is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

### **Alec T. Griffiths (DOB 02/16/1996)**

#### **Education Experience (Post-High School):**

09/2018 – 06/2019:	Eastern Washington University	MPAcc – Professional Accounting
09/2014 – 06/2018:	Eastern Washington University	BAB – Professional Accounting

#### **Business Experience (Preceding 5 years):**

07/2017 – Present:	IAR	Griffiths, Dreher & Evans, P.S., CPAs
08/2014 – 06/2017:	Food Runner	24 Taps Burgers & Brews

#### **Disciplinary Information**

Alec T. Griffiths has no legal or disciplinary events to report.

#### **Other Business Activities**

The supervised person is not actively engaged in any other investment-related businesses or occupations.

The supervised person is also actively engaged as a CPA which provides a substantial source of the supervised person's income and involves a substantial amount of the supervised person's time.

Because GDE offers CPA/accounting services, GDE is continually monitoring for conflicts of interest and only accepts engagements where GDE believes they can be fiduciaries and be objective where there is a conflict. As needed, GDE discloses such conflicts to all parties in writing. Alec T. Griffiths does not have any conflicts of interest to report.

#### **Additional Compensation**

Alec T. Griffiths does not receive an economic benefit from anyone who is not a client for providing advisory services.

#### **Supervision**

Alec T. Griffiths is the Chief Compliance Officer of Griffiths, Dreher & Evans, P.S., CPAs. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives. Alec T. Griffiths can be contacted at 509-326-4054.



## **Gregory T. Kelly**

CRD # 6882578  
Griffiths, Dreher & Evans, P.S., CPAs  
408 N Mullan Rd Spokane Valley, WA 99206  
(509) 326-4054 [www.grifco.com](http://www.grifco.com)  
Brochure Supplement  
Date: March 2023

**This Brochure Supplement provides information about Gregory T. Kelly that supplements the Griffiths, Dreher & Evans, P.S., CPAs Brochure. You should have received a copy of that Brochure. Please contact Alec T. Griffiths, Chief Compliance Officer, if you did *not* receive Griffiths, Dreher & Evans, P.S., CPAs Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Gregory T. Kelly is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

### **Gregory T. Kelly (DOB 02/12/1973)**

#### **Education Experience (Post-High School):**

09/2005 – 06/2009: Eastern Washington University      BAB – Professional Accounting

#### **Business Experience (Preceding 5 years):**

03/2017 – Present:	IAR	Griffiths, Dreher & Evans, P.S., CPAs
07/2016 – 03/2017:	EVP – Operations	Davis Transport, Inc.
11/2012 – 06/2016:	Senior Financial Analyst	Northwest Farm Credit

#### **Disciplinary Information**

Gregory T. Kelly has no legal or disciplinary events to report.

#### **Other Business Activities**

The supervised person is not actively engaged in any other investment-related businesses or occupations.

The supervised person is also actively engaged as a CPA which provides a substantial source of the supervised person's income and involves a substantial amount of the supervised person's time.

Because GDE offers CPA/accounting services, GDE is continually monitoring for conflicts of interest and only accepts engagements where GDE believes they can be fiduciaries and be objective where there is a conflict. As needed, GDE discloses such conflicts to all parties in writing. Gregory T. Kelly does not have any conflicts of interest to report.

#### **Additional Compensation**

Gregory T. Kelly does not receive an economic benefit from anyone who is not a client for providing advisory services.

#### **Supervision**

Alec T. Griffiths is the Chief Compliance Officer of Griffiths, Dreher & Evans, P.S., CPAs. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives including Gregory T. Kelly. Alec T. Griffiths can be contacted at 509-326-4054.

## **Kelly N. Klossner**

CRD # 4150650  
Griffiths, Dreher & Evans, P.S., CPAs  
408 N Mullan Rd Spokane Valley, WA 99206  
(509) 326-4054 [www.grifco.com](http://www.grifco.com)  
Brochure Supplement  
Date: March 2023

**This Brochure Supplement provides information about Kelly N. Klossner that supplements the Griffiths, Dreher & Evans, P.S., CPAs Brochure. You should have received a copy of that Brochure. Please contact Alec T. Griffiths, Chief Compliance Officer, if you did *not* receive Griffiths, Dreher & Evans, P.S., CPAs Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Kelly N. Klossner is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

### **Kelly N. Klossner (DOB 02/21/1974)**

#### **Education Experience (Post-High School):**

09/1992 – 12/1996: Biola University                      BAB – Professional Accounting

#### **Business Experience (Preceding 5 years):**

08/2007 – Present: IAR                      Griffiths, Dreher & Evans, P.S., CPAs

#### **Disciplinary Information**

Kelly N. Klossner has no legal or disciplinary events to report.

#### **Other Business Activities**

The supervised person is not actively engaged in any other investment-related businesses or occupations.

The supervised person is also actively engaged as a CPA which provides a substantial source of the supervised person's income and involves a substantial amount of the supervised person's time.

Because GDE offers CPA/accounting services, GDE is continually monitoring for conflicts of interest and only accepts engagements where GDE believes they can be fiduciaries and be objective where there is a conflict. As needed, GDE discloses such conflicts to all parties in writing. Kelly N. Klossner does not have any conflicts of interest to report.

#### **Additional Compensation**

Kelly N. Klossner does not receive an economic benefit from anyone who is not a client for providing advisory services.

#### **Supervision**

Alec T. Griffiths is the Chief Compliance Officer of Griffiths, Dreher & Evans, P.S., CPAs. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives including Kelly N. Klossner. Alec T. Griffiths can be contacted at 509-326-4054.

## **Susan M. Marshall**

CRD # 5460863  
Griffiths, Dreher & Evans, P.S., CPAs  
408 N Mullan Rd Spokane Valley, WA 99206  
(509) 326-4054 [www.grifco.com](http://www.grifco.com)  
Brochure Supplement  
Date: March 2023

**This Brochure Supplement provides information about Susan M. Marshall that supplements the Griffiths, Dreher & Evans, P.S., CPAs Brochure. You should have received a copy of that Brochure. Please contact Alec T. Griffiths, Chief Compliance Officer, if you did *not* receive Griffiths, Dreher & Evans, P.S., CPAs Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Susan M. Marshall is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

### **Susan M. Marshall (DOB 08/07/1967)**

#### **Education Experience (Post-High School):**

09/1992 – 06/1996: Eastern Washington University      BAB – Professional Accounting

#### **Business Experience (Preceding 5 years):**

06/1995 – Present: IAR      Griffiths, Dreher & Evans, P.S., CPAs

#### **Disciplinary Information**

Susan M. Marshall has no legal or disciplinary events to report.

#### **Other Business Activities**

The supervised person is not actively engaged in any other investment-related businesses or occupations.

The supervised person is also actively engaged as a CPA which provides a substantial source of the supervised person's income and involves a substantial amount of the supervised person's time.

Because GDE offers CPA/accounting services, GDE is continually monitoring for conflicts of interest and only accepts engagements where GDE believes they can be fiduciaries and be objective where there is a conflict. As needed, GDE discloses such conflicts to all parties in writing. Susan M. Marshall does not have any conflicts of interest to report.

#### **Additional Compensation**

Susan M. Marshall does not receive an economic benefit from anyone who is not a client for providing advisory services.

#### **Supervision**

Alec T. Griffiths is the Chief Compliance Officer of Griffiths, Dreher & Evans, P.S., CPAs. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives including Susan M. Marshall. Alec T. Griffiths can be contacted at 509-326-4054.

## **Cameron D. Scott**

CRD # 7257736

Griffiths, Dreher & Evans, P.S., CPAs  
408 N Mullan Rd Spokane Valley, WA 99206  
(509) 326-4054 [www.grifco.com](http://www.grifco.com)  
Brochure Supplement  
Date: March 2023

**This Brochure Supplement provides information about Cameron D. Scott that supplements the Griffiths, Dreher & Evans, P.S., CPAs Brochure. You should have received a copy of that Brochure. Please contact Alec T. Griffiths, Chief Compliance Officer, if you did *not* receive Griffiths, Dreher & Evans, P.S., CPAs Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Cameron D. Scott is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

### **Cameron D. Scott (DOB 05/12/1996)**

#### **Education Experience (Post-High School):**

09/2018 – 06/2019:	Eastern Washington University	MPAcc – Professional Accounting
09/2014 – 06/2018:	Eastern Washington University	BAB – Professional Accounting

#### **Business Experience (Preceding 5 years):**

10/2017 – Present:	IAR	Griffiths, Dreher & Evans, P.S., CPAs
--------------------	-----	---------------------------------------

#### **Disciplinary Information**

Cameron D. Scott has no legal or disciplinary events to report.

#### **Other Business Activities**

The supervised person is not actively engaged in any other investment-related businesses or occupations.

The supervised person is also actively engaged as a CPA which provides a substantial source of the supervised person's income and involves a substantial amount of the supervised person's time.

Because GDE offers CPA/accounting services, GDE is continually monitoring for conflicts of interest and only accepts engagements where GDE believes they can be fiduciaries and be objective where there is a conflict. As needed, GDE discloses such conflicts to all parties in writing. Cameron D. Scott does not have any conflicts of interest to report.

#### **Additional Compensation**

Cameron D. Scott does not receive an economic benefit from anyone who is not a client for providing advisory services.

#### **Supervision**

Alec T. Griffiths is the Chief Compliance Officer of Griffiths, Dreher & Evans, P.S., CPAs. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives including Cameron D. Scott. Alec T. Griffiths can be contacted at 509-326-4054.

**Brett G. Smith**

CRD # 5857475  
Griffiths, Dreher & Evans, P.S., CPAs  
408 N Mullan Rd Spokane Valley, WA 99206  
(509) 326-4054 [www.grifco.com](http://www.grifco.com)  
Brochure Supplement  
Date: March 2023

**This Brochure Supplement provides information about Brett G. Smith that supplements the Griffiths, Dreher & Evans, P.S., CPAs Brochure. You should have received a copy of that Brochure. Please contact Alec T. Griffiths, Chief Compliance Officer, if you did *not* receive Griffiths, Dreher & Evans, P.S., CPAs Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Brett G. Smith is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Brett G. Smith (DOB 04/30/1984)**

**Education Experience (Post-High School):**

09/2002 – 06/2006: Eastern Washington University      BAB – Professional Accounting

**Business Experience (Preceding 5 years):**

07/2006 – Present: IAR      Griffiths, Dreher & Evans, P.S., CPAs

**Disciplinary Information**

Brett G. Smith has no legal or disciplinary events to report.

**Other Business Activities**

The supervised person is not actively engaged in any other investment-related businesses or occupations.

The supervised person is also actively engaged as a CPA which provides a substantial source of the supervised person’s income and involves a substantial amount of the supervised person’s time.

Because GDE offers CPA/accounting services, GDE is continually monitoring for conflicts of interest and only accepts engagements where GDE believes they can be fiduciaries and be objective where there is a conflict. As needed, GDE discloses such conflicts to all parties in writing. Brett G. Smith does not have any conflicts of interest to report.

**Additional Compensation**

Brett G. Smith does not receive an economic benefit from anyone who is not a client for providing advisory services.

**Supervision**

Alec T. Griffiths is the Chief Compliance Officer of Griffiths, Dreher & Evans, P.S., CPAs. He is responsible for overseeing and enforcing the firm’s compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives including Brett G. Smith. Thomas Griffiths can be contacted at 509-326-4054.

