

# Dorval Corporation

Registered Investment Adviser

CRD # 309512

Dorval & Chorne Financial Advisors

11242 86th Avenue North

Maple Grove, MN 55369

Tel: 612-436-3714

Fax: 763-657-0537

Web: [www.dorvalchorne.com](http://www.dorvalchorne.com)

Twitter: [twitter.com/DorvalChorne](https://twitter.com/DorvalChorne)

Facebook: Dorval-Chorne-Financial-Advisors-497564526960030

LinkedIn: [dorval-&-chorne-financial-advisors](https://www.linkedin.com/company/dorval-&-chorne-financial-advisors)

Form ADV Part 2A

Firm Brochure

October 26, 2023

This brochure provides information about the qualifications and business practices of Dorval Corporation. Please contact Daniel Dorval at 763-795-9168 if you have any questions about the content of this brochure.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or any state securities administrator. Additional information about Dorval Corporation is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Click on the "Investment Adviser Search" link and then search for "Investment Adviser Firm" using the firm's IARD ("CRD") number, which is 309512.

While the firm and its associates may be registered and/or licensed within a particular jurisdiction, that registration and/or licensing in itself does not imply an endorsement by any regulatory authority, nor does it imply a certain level of skill or training on the part of the firm or its associated personnel.

## **Item 2 - Material Changes**

Since the previous filing dated March 6, 2023, the following changes have been made:

- Item 4: The firm's AUM has been updated.
- Items 4 and 16: The firm has added discretionary asset management as portfolio management option.
- Item 5: The firm's fee schedules have been updated to include fees for clients whose assets are custodied at Charles Schwab.
- Item 10: The firm's management personnel no longer have an affiliation with AdvisorNet Wealth Management.
- Item 12: The firm has updated its policy for aggregating securities transactions.
- Item 12 and 14: The firm has added Charles Schwab as a custodian.

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or may contact our firm at 612-436-3714 to request a copy at any time.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

### **Item 3 - Table of Contents**

Item 1 - Cover Page.....	1
Item 2 - Material Changes.....	2
Item 3 - Table of Contents .....	3
Item 4 - Advisory Business .....	4
Item 5 - Fees and Compensation .....	8
Item 6 - Performance-Based Fees and Side-By-Side Management .....	11
Item 7 - Types of Clients .....	11
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss .....	11
Item 9 - Disciplinary Information .....	18
Item 10 - Other Financial Industry Activities and Affiliations.....	18
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	18
Item 12 - Brokerage Practices .....	20
Item 13 - Review of Accounts .....	24
Item 14 - Client Referrals and Other Compensation.....	25
Item 15 - Custody.....	25
Item 16 - Investment Discretion .....	26
Item 17 - Voting Client Securities.....	26
Item 18 - Financial Information .....	26
Item 19 - Requirements for State-Registered Advisers .....	27

### **Important Information**

Throughout this document, Dorval Corporation may also be referred to as “the firm,” “firm,” “our,” “we” or “us.” The client or prospective client may be also referred to as “you,” “your,” etc., and refers to a client engagement involving a single *person* as well as two or more *persons*, including legal entities and natural persons. In addition, the term “advisor” and “adviser” are used interchangeably where accuracy in identification is necessary (i.e., internet address, etc.).

The firm maintains a business continuity and succession plan that is integrated within the organization to ensure it appropriately responds to events that pose a significant disruption to its operations. A statement concerning the current plan is available under separate cover upon request.

#### **Item 4 - Advisory Business**

##### **Description of the Firm**

Dorval Corporation is a Minnesota domiciled corporation formed in November of 2003 for general business purposes and became registered as an investment adviser in Minnesota during September of 2020. We typically operate under the trade name Dorval & Chorne Financial Advisors.

Daniel J. Dorval, CFP® is the firm's President and Chief Compliance Officer (firm supervisor), and John T. Chorne, CFP® serves as our Vice President. Both officers maintain interest in the firm. Detailed background information about Messrs. Dorval and Chorne can be found in their personal Form ADV Part 2B supplement that accompanies this firm brochure.

Our firm is independently owned, but we do have industry affiliations and operating relationships that are described in Items 5 and 10 of this brochure. Dorval & Chorne Financial Advisors and its associates may register, become licensed or meet certain exemptions to registration and/or licensing in other jurisdictions in which investment advisory business is conducted.

As of October 3, 2023, Dorval & Chorne Financial Advisors managed approximately \$199,825,411 on a discretionary basis and \$38,988,835 on a non-discretionary basis.

##### **Description of Services**

An initial interview with the client is conducted to discuss their current situation, long-term goals, and the scope of services that may be provided. Prior to or during this first meeting the client will be provided with this Form ADV Part 2 firm brochure that includes a statement involving the firm's privacy policy, as well as a brochure supplement about their firm representative. Material conflicts of interest will be disclosed involving the firm and its associates that could be reasonably expected to impair the rendering of unbiased and objective advice, such as information found in Items 10 through 12 of this brochure.

If you choose to engage the firm for its services, you must first execute our client agreement. Thereafter discussion and analysis will be conducted to determine your financial needs, goals, holdings, etc. Depending on the scope of the engagement, you may be asked to provide copies of the following documents early in the process:

- Wills, codicils, and trusts
- Insurance policies
- Mortgage information
- Student loans
- Credit card information and other forms of revolving debt
- Tax returns
- Divorce decree or separation agreement
- Current financial specifics including W-2s or 1099s
- Information on current retirement plans and benefits provided by your employer
- Statements reflecting current investments in retirement and non-retirement accounts
- Employment or other business agreements you may have in place

It is important that the firm is provided with an adequate level of information and supporting documentation throughout the term of the engagement including but not limited to: source of funds, income levels, and an account holder or attorney-in-fact's authority to act on behalf of the account, among

other information that may be necessary for our services. The information and/or financial statements provided need to be accurate. The firm may, but is not obligated to, verify the information that you have provided which will then be used in the advisory process. It is also essential that you inform the firm of significant issues that may call for an update to your plan. Events such as changes in employment or marital status, an unplanned windfall, etc., can have an impact on your circumstances and plans. Our firm needs to be aware of such events so that adjustments may be made as necessary.

### ***Financial Planning***

Your financial plan is customized for your situation, and it may be broad-based or narrowly focused as you desire. The incorporation of most or all the following components allows not only a thorough analysis but also a tailored plan that is focused on your unique requirements so that we are able to assist you in reaching your goals.

### ***Cash Flow Analysis and Debt Management***

A review of your income and expenses will be conducted to determine your current surplus or deficit. Based upon the results, advice is provided on prioritizing how any surplus should be used, or how to reduce expenses if they exceed your income. Guidance on the prioritization of which debts to repay may be provided, based upon such factors as the debt's interest rate and any income tax ramifications. Recommendations may also be made regarding the appropriate level of cash reserves for emergencies and other financial goals. These recommendations are based upon a review of cash accounts (such as money market funds) for such reserves and may include strategies to save desired reserve amounts.

### ***Risk Management***

A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").

### ***Employee Benefits***

A review is conducted, and analysis is made as to whether you, as an employee, are taking maximum advantage of your employee benefits. The firm will offer advice on your employer-sponsored retirement plan and/or stock options, along with other benefits that may be available to you.

### ***Personal Retirement Planning***

Retirement planning services typically include projections of your likelihood of achieving your financial goals, with financial independence usually the primary objective. For situations where projections show less than the desired results, a recommendation may include showing you the impact on those projections by making changes in certain variables (i.e., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

### ***Tax Planning Strategies***

Guidance is available on ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, recommendations may be offered as to which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

Please consult your tax professional for specific tax advice

### Education Planning

Advice involving funding an education may include projecting the amount that will be needed to achieve post-secondary goals, along with savings strategies and the “pros-and-cons” of various college savings vehicles that are available. A review of your financial picture as it relates to eligibility for financial aid or ways to contribute to family members’ educations will be offered.

### Estate Planning and Charitable Giving

Our review typically includes an analysis of the client’s exposure to estate taxes and their current estate plan, which may include whether they have a will, powers of attorney, trusts, and other related documents. We may assess ways to minimize or avoid estate taxes by implementing appropriate estate planning and charitable giving strategies. We are not a law firm, but we can recommend an attorney if a client does not have one on retainer (we do not receive compensation for our introductions).

### Divorce Planning

Separation or divorce can have a major impact on a person’s goals and plans. We work with affected clients to help them gain an understanding of their unique situation and provide them with a realistic financial picture so that they are in a better situation to communicate with their family law attorney, mediator or soon to be ex-spouse. We can assist in the completion of cash flow and net worth projections, budgetary analysis, as well as help them understand the financial consequences involving a settlement.

### Investment Consultation

The investment consultation component often involves providing information on the types of investment vehicles available, an investment analysis and strategy, asset selection and portfolio design, as well as limited assistance if your investment account is maintained at another broker/dealer or custodian. The strategies and types of investments that may be recommended are further discussed in Item 8 of this brochure.

### Business Consultation

We are available to assist businesses in a variety of ways to include corporate finance advice, budgeting, employee retention strategies, as well as coordination with financial institutions, corporate attorney, or accounting firm.<sup>1</sup>

### *Broad-Based versus Modular Planning*

A financial plan requires detail and certain variables can affect the time involved in the development of the plan, such as the quality of your own records, complexity and number of current investments, diversity of insurance products and employee benefits you currently hold, size of the potential estate, and special needs of the client or their dependents, among others. At your request, we may concentrate on reviewing only a specific area (modular planning), such as focusing on your employer’s retirement plan allocation, funding a child’s education, etc. Note that when our services focus only on certain areas of your interest or need, your overall situation or needs may not be fully addressed due to limitations you may have established.

---

<sup>1</sup> We do not serve as a retirement plan fiduciary, plan adviser or investment manager as defined in § 3(21) of the Employee Retirement Income Security Act of 1974 (ERISA) or as an ERISA § 3(38), nor do we serve as ERISA § 3(16) plan third-party administrator.

Whether we have created a broad-based or modular plan, we will present you with a summary of our recommendations and guide you in their implementation when appropriate. In all instances involving our engagements, our clients retain full discretion over all planning implementation decisions and are free to accept or reject any planning recommendation that we make.

### ***Portfolio Management***

We begin our portfolio management process by developing investment guidelines that reflect your objectives, time horizon, tolerance for risk. We allow reasonable account constraints that a client may have for their portfolio. For example, you have the right to exclude certain securities (e.g., no “sin stocks,” etc.) at your discretion. However, investment guidelines are designed to be specific enough to provide future guidance while allowing flexibility to work with changing market conditions. We will then develop a customized portfolio for you based on your unique situation, investment goals and tolerance for risk. Our portfolio strategies and recommended investments are discussed in Item 8, and we offer both non-discretionary and discretionary management of client assets (defined in Item 16). We do not sponsor or serve as portfolio manager for wrap fee investment programs.

### ***Educational Workshops***

From time-to-time we may organize complimentary educational seminar sessions involving personal finance and investing. Topics include issues related to general financial planning, educational funding, estate planning, retirement strategies, implications involving changes in marital status, and various other current economic or investment topics. Our workshops are educational in nature and do not involve the solicitation of insurance or investment products, nor do our general sessions offer specific advice to attendees.

### ***Retirement Plan Advice and Rollovers***

As a registered investment adviser, our firm is a fiduciary to every client, meaning that we are obligated to act in our clients’ best interests at all times. In addition to our fiduciary status as an investment adviser firm, when our firm provides advice to retirement investors, such as advice on an employer-sponsored retirement plan, Individual Retirement Account (IRA) or other qualified retirement plan, we may also be considered by the Department of Labor and the Internal Revenue Service to be acting as a fiduciary under Title I of ERISA and the Internal Revenue Code. These fiduciary obligations include requirements that we disclose our services and fees, conflicts of interest, and the reasons our recommendations are in the client’s best interests.

After an analysis of the client’s situation and plan documents, we will consider relevant factors including but not limited to the following:

- Alternatives to rolling the employer plan to an IRA, including leaving the money in an employer’s retirement plan (if permitted), rolling the money to a new employer plan if available, or cashing out,
- The fees and expenses associated with both the employer’s plan and the rollover IRA (or other alternatives such as noted above) and whether the employer current pays for some or all of the plan’s expenses,
- The different levels of services and investments available under the employer plan and the rollover IRA, and other alternatives,
- Evidence that a rollover is the most appropriate choice in light of any additional costs and the resultant decrease in the client’s returns,
- How withdrawals are treated under each alternative (e.g., penalties up to age 55 vs. 59-1/2),
- Protection from creditors and legal judgments (unlimited vs. bankruptcy only, federal- and state-specific),

- Required minimum distributions,
- Tax implications of rolling shares of employer stock,
- The impact of economically significant investment features such as surrender schedules and index annuity cap and participation rates (such as in an employer-sponsored 403(b) plan account),
- Any other relevant variables particular to the client's situation.

The client will be made aware of conflicts of interest including but not limited to whether our firm will profit from a recommendation through financial planning and/or investment management fees, and whether services we offer are already provided by or available through the current plan, potentially at no additional cost.

### **Item 5 - Fees and Compensation**

Forms of payment are based on the types of services being provided, term of service, etc., and will be stated in your engagement agreement with our firm. Our stated fees are negotiable, and we typically reduce or waive for associates of the firm, family members, or pre-existing relationships, and we often discount our fee based on the longevity of the client relationship.

Fees are to be paid to the firm by check or draft from US-based financial institutions. With your prior authorization, payment may also be made by credit or debit card through a qualified, unaffiliated PCI compliant<sup>2</sup> third-party processor, or withdrawal from your investment account held at your custodian of record. Dorval & Chorne Financial Advisors does not accept cash, money orders or similar forms of payment for its engagements.

### ***Financial Planning***

Project-based financial planning services are typically designed for those who prefer a broad-based plan, involving multiple service components. The fee ranges from \$500 to \$5,000 per plan, and is determined by the complexity of the engagement, estimated time involved developing the plan, number of accounts involved, etc. No deposit at engagement is required. Payment is due in full upon delivery of our invoice which coincides with the presentation of your plan.

Clients interested in a limited planning component engagement are assessed an hourly fee. Our rate is up to \$500 per hour, billed in 15-minute increments, and a partial increment (e.g., seven minutes) will be treated as a whole increment. Prior to entering into an agreement with our firm you will receive an estimate of the overall cost based on your requirements and the time involved.

We do not require a deposit for our hourly engagements, the fee will be due upon plan delivery. However, an hourly engagement lasting more than one month will be billed at the end of each month for time incurred.

### ***Portfolio Management***

We do not assess account opening and/or administration fees to initiate our portfolio management services. Accounts are assessed an annualized asset-based fee that is paid quarterly, in arrears. Our fee is based on a straight tier, all accounts are charged a single percentage rate that declines as asset levels increase. For the benefit of discounting our asset-based fee, we aggregate accounts for the same household.

---

<sup>2</sup> For an explanation of the term "PCI," who the PCI Security Standards Council is, as well as its comprehensive standards to enhance payment card data security, please go to [https://www.pcisecuritystandards.org/security\\_standards/index.php](https://www.pcisecuritystandards.org/security_standards/index.php)



For accounts held at Schwab (Table 1), accounts are assessed an annualized asset-based fee that is paid monthly, in arrears. The fee is based on a straight tier; all accounts are charged a single percentage rate that declines as asset levels increase. Our stated fees are negotiable, and we typically reduce or waive for associates of the firm, family members, or pre-existing relationships, and we may discount our fee based on the longevity of the client relationship.

Depending on the custodian used, the fee is calculated by (Table 1) multiplying the prior month's average daily account value by the applicable number of basis points (one basis point equals 1/100 of one percent) and dividing that result by 12 to determine the monthly fee, (Table 2) multiplying the quarter's end account value by the applicable number of basis points (one basis point equals 1/100 of one percent) and dividing that result by four to determine the quarterly fee, or (Table 3) multiplying the account's average daily balance by the associated fee's basis points times the number of days in the service quarter (90, 91, or 92) and then dividing the result by the number of days in the year (typically 365).

**Table 1: Schwab Advisor Services**

*Formula ((prior month average daily market value) x (applicable number of basis points)) ÷ 12*

<b>Assets Under Management</b>	<b>Maximum Annualized Asset-Based Fee</b>
\$1,000 - \$150,000	1.30% (130 basis points)
\$150,000 - \$300,000	1.15% (115 basis points)
\$300,000 - \$500,000	1.05% (115 basis points)
\$500,000 - \$1,000,000	0.95% (95 basis points)
\$1,000,000 - \$2,500,000	0.85% (85 basis points)
\$2,500,000 - \$5,000,000	0.75% (75 basis points)
Above \$5,000,000	0.65% (65 basis points)

**Minimum Account Value: \$1,000**

**Table 2: Nationwide Advisor Solutions**

*Formula ((quarter-end market value) x (applicable number of basis points)) ÷ 4*

<b>Assets Under Management</b>	<b>Annualized Asset-Based Fee</b>
\$25,000 - \$150,000	1.30% (130 basis points)
\$150,000 - \$300,000	1.15% (115 basis points)
\$300,000 - \$500,000	1.05% (115 basis points)
\$500,000 - \$1,000,000	0.95% (95 basis points)
\$1,000,000 - \$2,500,000	0.85% (85 basis points)
\$2,500,000 - \$5,000,000	0.75% (75 basis points)
Above \$5,000,000	0.65% (65 basis points)

**Minimum Account Value: \$25,000**

**Table 2: Capital Group Companies**

*Formula ((average daily balance) x (applicable number of basis points)) ÷ 365*

<b>Assets Under Management</b>	<b>Annualized Asset-Based Fee</b>
\$0 - \$249,999.99	0.75% (75 basis points)
\$250,000 - \$499,999.99	0.50% (50 basis points)
\$500,000 – Above	0.25% (25 basis points)

The Capital Group Program, also referred to as American Fund Services (AFS), only allows American Funds mutual funds, which are traded with no transaction fees. AFS is responsible for calculating advisory fees based upon client's cumulative asset values (including all account types and share classes under the Program calculated on the last days of February, May, August, and November) deducted from the client's account and paid on the last day of the quarter. Please note the value of 529 Plan assets are considered in the household average daily asset balance for purposes of determining the appropriate advisory fee level charged on non-529 plan assets managed by the adviser, but advisory fees are not applied to or taken from 529 accounts.

Fees will be prorated for partial months. If the client's assets are fully redeemed prior to quarters end, the calculation date will be the asset value on the day prior to the full redemption.

The Capital Group charges a one-time setup fee of \$10 applied to each account. A \$10 annual fee also applies for individual retirement account (IRA), Section 529 Plan, and Coverdell Education Savings Accounts (ESA).

Our firm will send you a written invoice each billing period that describes the advisory fees to be deducted from the account at our firm's request. The invoice will include the total fee assessed, covered time period, calculation formula utilized, and reference to the assets under management in which the fee had been based. We encourage you to confirm the accuracy of our fee calculations with your account statements.

### ***Educational Workshops***

Workshops sessions are complimentary, no fee is assessed.

### ***Termination of Firm Services***

Either party may terminate the engagement agreement at any time by communicating the intent to terminate in writing. Dorval & Chorne Financial Advisors will not be responsible for investment allocation, advice, or transactional services (except for limited closing transactions) upon receipt of a termination notice.

We do not require an advance fee for our services. If a client of our firm does not receive our Form ADV Part 2 firm brochure at least 48 hours prior to entering into our firm's agreement, then that client will have the right to terminate the engagement without penalty within five business days after entering into the contract. If a client terminates a financial planning service after this five business-day rescission period, the client will be assessed an hourly fee for our time developing their plan up to the date of termination. A client engaging the firm for our portfolio management services who terminates their agreement after the five business-day rescission period will be assessed fees on a prorated basis for services incurred from either (i) as a new client, the date of the engagement to the date of the firm's receipt of the written notice of termination, or (ii) all other accounts, the last billing period to the date of the firm's physical or constructive receipt of written termination notice. If we are unable to deduct our fees from the client's account at the custodian of record, then our earned fees will be due upon the client's receipt of our invoice.

### ***Potential Additional Client Fees***

Any transactional or service fees (sometimes termed *brokerage fees*), individual retirement account fees, qualified retirement plan fees, account termination fees, or wire transfer fees will be borne by the account holder per the separate fee schedule of the custodian of record. Advisory fees paid to our firm for its advisory services are separate from any internal fees or charges a client may pay for mutual funds, exchange-traded funds (ETFs), exchange-traded notes (ETNs), or other similar investments. Additional information about firm fees in relationship to brokerage and operational practices may be found in Item 12 of this document.

## ***External Compensation***

We do not charge or receive a commission or mark-up on a client securities transaction, nor do we receive “trailer” or SEC Rule 12b-1 fees from an investment company we may recommend when we are engaged to provide portfolio management services. Fees charged by issuers are detailed in prospectuses or product descriptions and the client is encouraged to read these documents before investing. Clients retain the right to purchase recommended or similar investments through their own service provider.

When there is the potential for the receipt of a commission and other similar compensation via an insurance product transaction (e.g., purchase of a fixed annuity, life insurance policy, etc.), an associate of our firm (including firm management) that is licensed and appointed as an insurance agent has an incentive to make such a recommendation based on the compensation they may receive rather than a client’s needs. Our advisory firm and its associates take their responsibilities seriously and only intend to recommend investments, insurance, or advisory services we believe appropriate for the client. Please refer to Items 10 and 11 of this firm brochure, in addition to Item 4 of the associate’s brochure supplement for details.

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

Advisory fees paid to Dorval & Chorne Financial Advisors will not be based on a share of capital gains or capital appreciation (growth) of any portion of managed funds, also known as performance-based fees. Fees will not be based on side-by-side management, which refers to an advisory firm simultaneously managing accounts that do pay performance-based fees (such as a hedge fund) and those that do not.

## **Item 7 - Types of Clients**

Dorval & Chorne Financial Advisors provides its services to individuals and high net worth individuals, and we are available to assist businesses of all size. Our firm does not have client minimum account sizes. See our fee tables in Item 5 for any minimum account size requirements from custodians. Our firm reserves the right to decline services to any prospective client for any nondiscriminatory reason.

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

### ***Methods of Analysis***

We utilize fundamental analysis, evaluating various economic factors including interest rates, the current state of the economy, or the future growth of an industry sector. Firm research is often drawn from sources such as financial periodicals and reference materials, economists and other industry professionals, corporate rating services, and regulatory filings (e.g., annual reports, prospectuses, etc.).

### ***Investment Strategy***

Our primary strategy is based on Modern Portfolio Theory, oriented toward reducing risk by diversifying among an extensive range of asset classes such as domestic and international equities, fixed-income securities, and real estate. Portfolios constructed under this theory may be tilted to have a greater exposure toward a specific market capitalization, value stocks,<sup>3</sup> or highly profitable stocks in an effort to capture risk premiums historically associated with those asset classes. Our focus is developing and/or managing portfolios containing a broad range of mutual funds and variable annuity subaccounts which contain stocks, bonds, currencies, real estate, etc., as underlying holdings.

---

<sup>3</sup> Value investing involves buying above-average positions (holdings) at below-average prices. Conversely, when a holding is considered over-priced, it becomes a candidate to be sold.

## ***Risk of Loss***

Dorval & Chorne Financial Advisors believes its strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk, however, there is no guarantee that a planning goal or investment objective will be achieved. Past performance is not necessarily indicative of future results. Investing in securities involves risk of loss that clients should be prepared to bear. While the following list is not exhaustive, examples of such risk are noted in the following paragraphs, and the firm believes it is important that clients review and consider each prior to investing.

### **Active Management**

While not a focus of our firm's strategy, it is worth mentioning that a portfolio employing active management may outperform or underperform its stated benchmark. In an effort to meet or surpass a benchmark, actively managed portfolios may require more frequent trading or "turnover" which can result in shorter holding periods, higher transactional costs and/or taxable events generally borne by the client, thereby potentially reducing or negating certain benefits of active management.

### **Catastrophic Risk**

Natural or man-made catastrophes can disrupt financial markets and impact securities prices. Examples include terrorist attacks, natural disasters, war, etc. Investment companies can use "exigent circumstances" or "force majeure" as a defense against claims of loss by investors.

### **Company Risk**

When investing in securities, such as stocks, there is always a certain level of company or industry-specific risk that is inherent in each company or issuer. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as *unsystematic risk* and can be reduced or mitigated through diversification.

### **Currency Risk**

The risk of loss from fluctuating foreign exchange rates when a portfolio has exposure to foreign currency or in foreign currency traded investments is known as currency risk.

### **Equity (Stock) Risk**

Common stocks are susceptible to general stock market fluctuations and to volatile increases or decreases in value as market confidence in and perceptions of their issuers change. If an investor held common stock or common stock equivalents of any given issuer, they may be exposed to greater risk than if they held preferred stocks and debt obligations of the issuer.

Preferred stocks can be affected by interest rate and liquidity risks (described in adjacent paragraphs). Also note that their dividend payment is not guaranteed, some are subject to a call provision, meaning the issuer can redeem its preferred shares on demand, and usually when interest rates have fallen.

### **Emerging Markets Securities Risks**

Investments in emerging markets securities are considered speculative and subject to heightened risks in addition to the general risks of investing in foreign securities. Unlike more established markets, emerging markets may have governments that are less stable, markets that are less liquid, and economies that are less developed. In addition, the securities markets of emerging market countries may consist of companies with smaller market capitalizations and may suffer periods of relative illiquidity, significant price volatility, restrictions on foreign investment, and possible restrictions on repatriation of investment income and

capital. Furthermore, foreign investors may be required to register the proceeds of sales, and future economic or political crises could lead to price controls, forced mergers, expropriation or confiscatory taxation, seizure, nationalization, or creation of government monopolies.

#### Failure to Implement

As our planning client, you are free to accept or reject any or all recommendations made to you. While an advisory firm cannot guarantee future performance, a plan will not succeed if it is not implemented. Clients who choose not to take the steps recommended in their plan may face an increased risk that their stated goals and objectives will not be achieved.

#### Financial Risk

Excessive borrowing to finance a business operation increases profitability risk because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

#### Financial Sector Risk

Performance of companies in the financial sector may be adversely impacted by many factors, including, among others, government regulations, economic conditions, credit rating downgrades, changes in interest rates, and decreased liquidity in credit markets. The impact of more stringent capital requirements, recent or future regulation of any individual financial company, or recent or future regulation of the financial sector cannot be predicted. In recent years, cyber-attacks and technology malfunctions have become increasingly frequent in this sector and have caused significant losses to companies in this sector, which may negatively impact an account.

#### Fixed Income Risks

Various forms of fixed income instruments, such as bonds, money market or bond funds may be affected by various forms of risk, including:

- Credit Risk - The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as "default risk." Credit risk may also occur when an issuer's ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments, as well as fund share values that hold these issues. Bondholders are creditors of an issuer and have priority to assets before equity holders (e.g., stockholders) when receiving a payout from liquidation or restructuring. When defaults occur due to bankruptcy, the type of bond held will determine seniority of payment.
- Interest Rate Risk - The risk that the value of the fixed income holding will decrease because of an increase in interest rates.
- Reinvestment Risk - With declining interest rates, investors may have to reinvest interest income or principal at a lower rate.

#### Foreign Securities Risk

Investments in securities of foreign companies (including direct investments as well as investments through American Depositary Receipts -- *aka*. ADRs) can be more volatile than investments in US companies. Diplomatic, political, or economic developments, including nationalization or appropriation, could affect investments in foreign companies. Foreign securities markets generally have less trading volume and less

liquidity than US markets. In addition, the value of securities denominated in foreign currencies, and of dividends from these securities, can change significantly when foreign currencies strengthen or weaken relative to the US dollar. Financial statements of foreign issuers are governed by different accounting, auditing, and financial reporting standards than the financial statements of US issuers and may be less transparent and uniform than in the US. Thus, there may be less information publicly available about foreign issuers than about most US issuers. Transaction costs generally are higher than those in the US and expenses for custodial arrangements of foreign securities may be somewhat greater than typical expenses for custodial arrangements of similar US securities. Some foreign governments levy withholding taxes against dividend and interest income. Although in some countries a portion of these taxes are recoverable, the non-recovered portion will reduce the income received from the securities comprising an account's portfolio. These risks may be heightened with respect to emerging market countries since political turmoil and rapid changes in economic conditions are more likely to occur in these countries.

### Fundamental Analysis

The challenge involving fundamental analysis is that information obtained may be incorrect, the analysis may provide inaccurate estimate of earnings, which may be the basis for a security's value. If a security's price adjusts rapidly to new information, a fundamental analysis may result in unfavorable performance.

### Inflation Risk

Also called *purchasing power risk*, inflation risk is the chance that the cash flows from an investment will not be worth as much in the future because of changes in purchasing power due to inflation.

### Information Technology Sector Risk

Information technology companies face intense competition, both domestically and internationally, which may have an adverse effect on profit margins. As with other technology companies, information technology companies may have limited product lines, markets, financial resources, or personnel. The products of information technology companies may face obsolescence due to rapid technological developments, frequent new product introduction, unpredictable changes in growth rates, and competition for the services of qualified personnel. Companies in the information technology sector are heavily dependent on patent and intellectual property rights. The loss or impairment of these rights may adversely affect the profitability of these companies.

### Liquidity Risk

The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed income are generally liquid (e.g., bonds), there are risks which may occur such as when an issue trading in any given period does not readily support buys and sells at an efficient price. Conversely, when trading volume is high, there is also a risk of not being able to purchase a particular issue at the desired price.

### Macroeconomic Risk

Macroeconomic risk derives from the behavior of industries and governments and the relationships between them rather than from individual companies. It concerns fiscal and monetary policies, trade and investment flows and political developments on a national and international scale. Business cycles, depressions, inflation, unemployment, interest rates, valuations, prices, and imports/exports volumes are all unpredictable and can lower or destroy investment portfolios. Central banks and governments often resort to inflationary policies and excessive fiat currency issuance through borrowing and printing. These macroeconomic maneuvers may possibly support or increase the nominal value of investment assets short term but lead to inflation and asset bubbles and crashes later on.

### Market Risk

This is also called systematic risk. In cases where securities markets are under duress, securities may lose their ability to provide diversification benefit.

### Money Market Funds

A money market fund is managed to maintain a stable net asset value (NAV) of \$1 per share, the value of the fund may fluctuate, and you could lose money (termed “breaking the buck”). Money market funds are a type of mutual fund investing in high-quality, short-term debt securities, pays dividends that generally reflect short-term interest rates and seeks to maintain a stable NAV per share (typically \$1). An investment in a money market mutual fund is typically not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency.

### Mutual Funds

One of the earliest forms of public investing was the closed-end mutual fund from the late 1700’s in Europe. The first modern-day US mutual fund was the Massachusetts Investors Trust, created in 1924. The risk of owning a mutual fund is reflected in the underlying security(ies). Mutual funds are affected by risks such as market, interest rate, currency, credit, political, active risk, etc., as described in adjacent paragraphs. It is important to note that even “conservative” funds, such as a money market fund or fixed income fund, can and have lost their value below the principal amount invested. Mutual funds typically carry additional expenses based on their share of operating expenses and trading (brokerage) fees, which may result in the potential duplication of certain fees paid by the investor. Indexed mutual funds can also be adversely affected by “QDI ratios” that are described in a following paragraph. There are essentially nine main types of mutual fund shares classes, as well as sub-classes for some of these. Some mutual funds are sold through brokerage firms and assess a commission (“load”) in addition to their underlying fees earlier noted, while others are offered through investment advisers, retirement plans and other institutions. “No load” funds are also available to the public through brokerage firms, and they usually incur trading (brokerage) fees. If a client chooses to purchase a mutual fund on their own through a broker/dealer, they should consider the trading fees, internal operating costs, as well as potential commissions they pay through that executing firm. Our firm is not a broker/dealer and (per Items 5 and 10 of this brochure) does not recommend nor is compensated by a “loaded” fund.

Dorval & Chorne Financial Advisors offers a mutual fund only investment management program, limited to American Funds mutual funds (the “Capital Group Program” or AFS). Advantages of this program include low or no custodial and trading costs for the mutual funds and deferring any tax impact from sale of the mutual funds to move into other investments. Disadvantages of the program include (i) limited access to investment options (only American Funds mutual funds may be held), (ii) internal management fees and other fund expenses common with any mutual funds, (iii) there will be increased costs to the client to the extent that the management fees exceed the 12b-1 fees or other revenue that was being paid by American Funds for the original commission-based mutual fund share class, and (iv) F2 shares are used and there are lower cost share-classes available. Relative to increased costs, by way of example, if you had purchased A share commission-based mutual funds your adviser was receiving an ongoing 12b-1 fee of 0.25% (25 basis points). If you elect to convert to the Capital Group Program, to the extent that you are paying a management fee in excess of 25 basis points you will pay more for the management services being offered as compared to the 12b-1 fees you previously paid. Please also note that the Capital Group Program uses the F2 share-class, which is designed for advisory accounts, and does not pay a 12b-1 fee. However, this share class does pay sub-transfer agent fees (which are not paid by F3 share-class) and may have slightly higher administrative fees as compared to F3 share-class. The F3 share-class offered by American Funds is the least expensive share-class and is available through other custodians but is not offered under the Capital Group Program. Therefore, you can purchase this service using American Funds at a lower cost if you so



desire.

### Options Risks

Options may be used as a mutual fund's underlying holding/strategy. Risks involving options trading are detailed in the Chicago Board Options Exchange's "The Characteristics and Risks of Standardized Options" brochure that we will provide to you upon request or may be found at their website at:

<http://www.cboe.com>. We have provided general considerations involving options in the following statements.

#### Option Buyer's Risks

- The risk of losing the entire investment in a relatively short period of time
- The risk of losing the entire investment increases as an option goes out of the money and as expiration nears
- European style options that do not have secondary markets in which to sell options prior to expiration only realize their value upon expiration
- Specific exercise provisions of a specific option contract may create enhanced risk
- Regulatory agencies may impose exercise restrictions, which may deter the investor from realizing value

#### Option Seller's Risks

- Options sold may be exercised at any time before expiration
- Covered call traders forgo the right to profit when the underlying stock rises above the strike price of the call options sold and continues to risk a loss due to a decline in the underlying stock
- Writers of "naked call write" risk unlimited losses if the underlying stock rises, the writer of "naked put write" risk unlimited losses if the underlying stock drops. The writer of naked positions run margin risks if the position goes into significant losses, which may include liquidation by the broker/dealer of record. In addition, the writer of a "naked call write" is obligated to deliver shares of the underlying stock if those call options are exercised.
- Writers of call options can lose more money than a short seller of that stock on the same rise on that underlying stock due to leveraging used in option strategies
- Call options can be exercised outside of market hours such that effective remedy actions cannot be performed by the writer of those options
- Writers of stock options are obligated under the options that these writers sold even if a trading market is not available or that they are unable to perform a closing transaction
- The value of the underlying stock may unexpectedly surge or drop which may lead to an automatic exercise

### Passive Management

A portfolio that employs a passive, efficient markets approach has the risk of generating lower-than-expected returns due to its broad diversification when compared to a portfolio more narrowly focused.

### Political Risk

The risk of financial and market loss because of political decisions or disruptions in a particular country or region and may also be known as "geopolitical risk."



### Qualified Dividend Income Ratios

While many mutual funds are known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are asset classes within these investment vehicles or holding periods that do not benefit. Shorter holding periods, as well as commodities and currencies (underlying holdings of a mutual fund), may be considered “non-qualified” under certain tax code provisions. We consider a holding’s QDI when tax-efficiency is an important aspect of the client’s portfolio.

### Real Estate Investment Trusts

REIT risks include (i) following the sale or distribution of assets an investor could receive less than their principal invested, (ii) a lack of a public market in certain issues, (iii) limited liquidity and transferability, (iv) fluctuations involving the value of the assets within the REIT, (v) a reliance on the investment manager to select and manage assets, (vi) changes in interest rates, laws, operating expenses, and insurance costs, (vii) tenant turnover, and (viii) the impact of current market conditions.

### Research Data

When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. While our firm makes every effort to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice on or investment management of an account.

### Sequence of Return Risk

The risk of receiving lower or negative returns when frequent withdrawals are made from an individual’s portfolio.

### Small- and Mid-Capitalization Company Risk

The small- and mid-capitalization companies in which an account may invest may be more vulnerable to adverse business or economic events than larger, more established companies. Investments in these small- and mid-sized companies may pose additional risks, including liquidity risk, because these companies tend to have limited product lines, markets, and financial resources, and may depend upon a relatively small management group. Small- and mid-cap stocks, therefore, may be more volatile than those of larger companies. These securities may be traded over-the-counter (OTC) or listed on an exchange.

### Sociopolitical Risk

The risk of instability in a region due to war, terrorism, pandemics, etc., that might affect investment markets.

### Value Investing

A portfolio employing a value-based investing strategy could be adversely affected by inaccurate or flawed financial information or statements. For example, a company may have accidentally (or fraudulently) erred while entering data into its financial statements, or inadequately defines its earnings, resulting in a faulty valuation of its stock. Other examples might involve a “value manager” overpaying for a holding or missing the timing of a buy or sell of a position, making it a less valuable aspect of the portfolio.

### Variable Annuities

A variable annuity is a financial product considered by some to be both an insurance contract and a security that can be customized to provide certain lifetime guarantees, long-term tax-deferred investing, provide protection for income, as well as legacy and spousal needs. However, each type of annuity and its issuer (an insurance company) are unique as are their benefits, costs, and risks, and it is important that the client review these in detail with their representative.

### Item 9 - Disciplinary Information

Neither the firm nor its management has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding that would reflect poorly upon the firm's advisory business or its integrity.

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

Firm policies require associated persons to conduct business activities in a manner that avoids conflicts of interest between the firm and its clients, or that may be contrary to law. Our firm will provide disclosure to each client prior to and throughout the term of an engagement regarding any conflicts of interest involving its business relationships that might reasonably compromise its impartiality or independence.

Our advisory firm and its management are not registered nor have an application pending to register as a Financial Industry Regulatory Authority (FINRA) or National Futures Association (NFA) member firm or associated person of such a firm, nor are we required to be registered with or supervised by such entities. Members of our advisory firm's management serve as licensed insurance agents via AdvisorNet Financial, Inc. (doing business as AdvisorNet insurance). Further information regarding these activities may be found in each associates' Form ADV Part 2B brochure supplement. Whether they are serving a client in one or more capacities, each associate will disclose in advance how they are being compensated and if there is a conflict of interest involving any advice or service they may provide. At no time will there be *tying* between business practices and/or services, a condition where a client or prospective client would be required to accept one product or service which is conditional upon the selection of a second, distinctive tied product or service.

Neither the firm nor its management is or has a material relationship with any of the following types of entities:

- accounting firm or accountant
- bank, credit union or thrift institution, or their separately identifiable department or division
- lawyer or law firm
- pension consultant
- real estate broker, dealer or adviser
- sponsor or syndicator of limited partnerships
- trust company, or
- issuer of a security, to include investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," or offshore fund).

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

Our advisory firm is a fiduciary, we will act in the utmost good faith, performing in a manner believed to be in the best interest of its clients. Our firm believes that business methodologies, ethics rules, and adopted

policies are designed to eliminate or at least minimize material conflicts of interest and to appropriately manage any material conflicts of interest that remain. We will disclose to our clients any material conflict of interest relating to the firm, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

### ***Code of Ethics***

We have adopted a Code of Ethics that establishes policies for ethical conduct for our personnel. Our firm accepts the obligation not only to comply with all applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities. Firm policies include prohibitions against insider trading, circulation of industry rumors, and certain political contributions, among others. We periodically review and amend our Code of Ethics to ensure that they remain current, and we require firm personnel to annually attest to their understanding of and adherence to the firm's Code of Ethics. A copy of the firm's Code of Ethics is made available to any client or prospective client upon request.

### ***CFP® Principles***

Firm associates that are CERTIFIED FINANCIAL PLANNER™ Practitioners also adhere to the Certified Financial Planner Board of Standards, Inc.'s Code of Ethics & Professional Responsibility which you may find at [www.cfp.net](http://www.cfp.net).

### ***Privacy Policy Statement***

We respect the privacy of all clients and prospective clients (collectively termed "customers" per federal guidelines), both past and present. It is recognized that clients have entrusted our firm with non-public personal information, and it is important that both access persons and customers are aware of firm policy concerning what may be done with that information.

Our firm collects personal information about customers from the following sources:

- Information provided to us to complete their plan or investment recommendation,
- Information provided via engagement agreements and other documents completed in connection with the opening and maintenance of an account,
- Information customers provide verbally, and
- Information received from service providers, such as custodians, about client transactions.

We do not disclose non-public personal information about our customers to anyone, except in the following circumstances:

- When required to provide services our customers have requested,
- When our customers have specifically authorized us to do so,
- When required during the course of a firm assessment (i.e., independent audit), or
- When permitted or required by law (i.e., periodic regulatory examination).

To ensure security and confidentiality, our firm maintains physical, electronic, and procedural safeguards to protect the privacy of customer information. Within the firm, access to customer information is restricted to personnel that need to know that information. All access persons and service providers understand that everything handled in firm offices is confidential and they are instructed not to discuss customer information with someone else that may request information about an account unless they are specifically authorized in writing by the customer to do so. This includes providing information about a family member's account.

We will provide our customers with our current privacy policy on an annual basis and at any time, in advance, if firm privacy policies are expected to change.

### ***Firm Recommendations and Conflicts of Interest***

Our associates are prohibited from borrowing from or lending to a client unless the client is an approved financial lending institution.

Neither our firm nor its associates are authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a “related person” (associates, their immediate family members, etc.) has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

Our firm and its related persons may buy or sell securities that are the same as, similar to, or different from, those we recommend to clients for their accounts. A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client. Clients often have different objectives and risk tolerances. At no time will our firm or any related party receive preferential treatment over our clients. We mitigate this conflict by ensuring that we have policies and procedures in place to ensure that the firm or a related person will not receive preferential treatment over a client. In order to reduce or eliminate certain conflicts of interest involving personal trading (e.g., trading ahead of client recommendations or trades, etc.), firm policy requires that we restrict or prohibit certain related parties’ transactions. Any exceptions must be approved in writing by our Chief Compliance Officer, and personal trading accounts are reviewed on a quarterly or more frequent basis. Please refer to Item 6 of the accompanying Form ADV Part 2B brochure supplement for further details.

### **Item 12 - Brokerage Practices**

#### ***Factors Used to Select Broker/Dealers for Client Transactions***

Our client accounts must be separately maintained by a “qualified custodian” which we have loosely defined for the purpose of this brochure as a broker/dealer, futures commission merchant, insurance company, mutual fund transfer agent, national bank or trust company, that are frequently reviewed for their capabilities to serve in that capacity by their respective industry regulatory authority. Our firm is not a custodian, there is not an affiliate that is a custodian, nor does a custodian supervise our firm, its activities, or our associates. We do not receive referrals from a custodian or broker/dealer, nor are client referrals a factor in our recommendation of a custodian or broker/dealer.

When a client engages us for financial planning, they have the right to keep their assets with their present custodian/service provider. If the client prefers a new service provider, a recommendation made by our firm will be based on client need, overall costs, ease of use, and following our review of the recommended provider.

When you engage our firm to provide its portfolio management services, we require your custodian to be Charles Schwab, American Funds Services Company (a Capital Group Companies entity), or Nationwide Investment Services Corporation (a Nationwide Life Insurance Company subsidiary). Our firm is independently owned and operated, we are not legally affiliated with the above-listed custodians.

While we recommend these organizations as custodian, the client will decide whether to do so and will open their account with them by entering into an account agreement directly with the custodian. We do not technically open the account for a client, although we will assist our clients in doing so

Our custodians offer independent investment advisers various services which include custody of client

assets, as well as trade execution, clearance, and settlement, etc. Our firm may receive other benefits from our preferred custodian through participation in their independent adviser support program. These benefits may include the following products and services (provided either without cost or at a discount):

- receipt of duplicate client statements and confirmations
- research related products and tools
- the ability to have advisory fees deducted directly from a client's accounts (per written agreement)
- resource information related to capital markets and various investments
- access to electronic communications networks for client order entry and account information
- access to mutual funds with no transaction fees, and
- discounts on marketing, research, technology, and practice management products or services provided to our firm by third-party providers.

Some of the noted tools and services made available by our custodian benefit our advisory firm but not directly benefit a client's account. While our firm does not think these services are considered "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934, certain jurisdictions where we serve client accounts believe they fall under this definition. The availability of these services benefits our firm because we do not have to produce or purchase them as long as clients maintain assets in accounts at our recommended custodian. A conflict of interest exists since our firm has an incentive to select or recommend a custodian based on our firm's interest in receiving these benefits rather than our clients' interests in receiving favorable trade execution. It is important to mention that the benefit received by our firm through participation in any custodian's program does not depend on the amount of brokerage transactions directed to that custodian, and our selection of a custodian is primarily supported by the scope, quality, and cost of services provided as a whole, not just those services that benefit only our advisory firm. Further, we will act in the best interest of our clients regardless of the custodian we may select. Our firm conducts periodic assessments of any recommended service provider which generally involves a review of the range and quality of services, reasonableness of fees, among other items, in comparison to industry peers.

### **Best Execution**

"Best execution" means the most favorable terms for a transaction based on all relevant factors, including those listed in the paragraph titled *Factors Used to Select Broker/Dealers for Client Transactions*. Our firm recognizes its obligation in seeking best execution for clients, however, it is believed that the determinative factor is not always the lowest possible cost but whether transactions represent the best "qualitative execution" while taking into consideration the full range of services provided. Dorval & Chorne Financial Advisors will seek services involving competitive rates, but it may not necessarily correlate into the lowest possible rate for each transaction. We have determined having clients' trades completed through the noted custodians are consistent with our obligation in seeking best execution. A review is regularly conducted by our firm regarding recommendations of custodians in light of our duty involving best execution.

Our firm may, in its discretion and following custodian approval, accept the client's transfer of preexisting retail mutual funds into their account. A transfer-in-kind of retail share class mutual funds may potentially benefit the client since they are able to invest in their portfolio more quickly, mitigate tax and/or short-term trading liabilities, and/or avoid contingent deferred sales charges (CDSC). Our firm regularly reviews accounts that have transferred different share classes of mutual funds and will convert share classes to a lower expense share class when we believe doing so would be beneficial to the client. In addition, if account assets remain in a retail share class and within a CDSC period, we may exclude those assets from our advisory fee until they have been converted to what we believe is a more appropriate share class.

### ***Directed Brokerage***

Internal policy and operational relationship with our custodians require accounts custodied with them to have trades executed per their order routing requirements. Our firm does not direct which executing broker should be selected for account trades, whether that is an affiliate of a preferred custodian or another executing broker of that custodian's choice. As a result, a client may pay higher commissions or other transaction costs, experience greater spreads, or receive less favorable net prices on transactions than might otherwise be the case. In addition, since our firm routinely recommends a particular custodian for clients' accounts, and that custodian may choose to use the execution services of their broker/dealer affiliate for some or all client transactions, there is an inherent conflict of interest involving our recommendation since our firm receives various products or services earlier described from that custodian. Note that Dorval & Chorne Financial Advisors is not compensated for trade routing/order flow, nor is the firm paid commissions on such trades. Our firm does not receive interest on client accounts' cash balances.

Our clients are unable to engage in directed brokerage via our custodian. As a result, they may pay higher commissions or other transaction costs, potentially experience greater spreads, or receive less favorable net prices on transactions for their account than would otherwise be the case if they had the opportunity to direct brokerage.

For those accounts maintained at a custodian of record other than ours, the client may choose to request that a particular broker is used to execute some or all account transactions. Under these circumstances, the client will be responsible for negotiating, in advance of each trade, the terms and/or arrangements involving their account with that broker, whether the selected broker is affiliated with our custodian of record or not. Our firm is not obligated to seek better execution services or prices from these other brokers and will be unable to aggregate the client's transactions for execution via our custodian with other orders for accounts managed by our firm. As a result, the client may pay higher commissions or other transaction costs, potentially experience greater spreads, or receive less favorable net prices on transactions for their account than would otherwise be the case.

### ***Charles Schwab***

We do not maintain custody of your assets that we manage or on which we advise, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We may recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we may recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open accounts for you, although we may assist you in doing so. Please read about potential conflicts of interest related to our recommendation of Schwab in Item 14 of this Brochure.

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades.

Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How we select brokers/custodians”).

Schwab Advisor Services™ is Schwab’s business serving independent investment advisory firms like us. They provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us. Following is a more detailed description of Schwab’s support services:

**Services that benefit you.** Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account.

**Services that may not directly benefit you.** Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts. They include investment research, both Schwab’s own and that of third parties. We may use this research to service all or a substantial number of our clients’ accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements).
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts.
- Provide pricing and other market data.
- Facilitate payment of our fees from our clients’ accounts.
- Assist with back-office functions, recordkeeping, and client reporting.

**Services that generally benefit only us.** Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events.
- Consulting on technology, compliance, legal, and business needs.
- Publications and conferences on practice management and business succession.
- Access to employee benefits providers, human capital consultants, and insurance providers.
- Marketing consulting and support.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party’s fees. Schwab may also provide us with other benefits, such as occasional business entertainment.

### ***Aggregating Securities Transactions***

Trade aggregation involves the purchase or sale of the same security for several clients/accounts at approximately the same time. This may also be termed “blocked” or “batched” orders. Aggregated orders are completed in an attempt to obtain better execution, negotiate favorable transaction rates, or to allocate equitably among multiple client accounts should there be differences in prices, brokerage commissions or other transactional costs that might otherwise be unobtainable through separately placed orders.



Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage on a discretionary basis (this practice is commonly referred to as “block trading”). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

For accounts managed on a nondiscretionary basis, utilizing mutual funds and variable annuities as the primary portfolio asset, we cannot aggregate client orders, therefore, an account may potentially be assessed higher costs or less favorable prices than those where aggregation would have occurred.

### **Item 13 - Review of Accounts**

#### ***Scheduled Reviews***

Periodic reviews are encouraged for our financial planning clients, and it is recommended that they occur on at least an annual basis. Reviews will be conducted by the client’s investment adviser representative and typically involves analysis and possible revision of your previous financial plan or investment allocation.

Investment portfolios are reviewed on a quarterly or more frequent basis by the client’s investment adviser representative. Client-level portfolio reviews are also completed by the client’s investment adviser representative, and we recommend that they occur on at least an annual basis.

A copy of revised written plans or asset allocation reports in printed or digital format will be provided to the client upon request.

#### ***Unscheduled Reviews***

You should contact our firm for additional reviews when you anticipate or have experienced changes in your financial situation (i.e., changes in employment, an inheritance, the birth of a new child, etc.), or if you prefer to change requirements involving your investment account. Interim plan reviews are conducted by investment adviser representative.

Additional portfolio reviews by portfolio managers and the client’s investment adviser representative may be triggered by news or research related to a specific holding, a change in our view of the investment merits of a holding, or news related to the macroeconomic climate affecting a sector or holding within that sector. A portfolio may be reviewed for an additional holding or when an increase in a current position is under consideration. Account cash levels above or below what we deem appropriate for the investment environment, given the client's stated tolerance for risk and investment objectives, may also trigger a review.

A copy of revised written plans or asset allocation reports in printed or digital format will be provided to the client upon request.

#### ***Client Reports***

Whether you have opened and maintained an investment account on your own or with our assistance, you will receive account statements sent directly from mutual fund companies, transfer agents, custodians or brokerage companies where your investments are held. We urge you to carefully review these account statements for accuracy and clarity, and to ask questions when something is not clear.



We do not create or distribute our own performance reports, nor do we back-test nor certify reports from an external party. Clients are reminded to carefully review and compare account statements provided by their custodian of record with any report they have received from any source containing investment performance information.

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

We do not engage in solicitation activities. If we receive or offer an introduction to a client, we do not pay or earn a referral fee, nor are there established *quid pro quo* arrangements. Each client has the right to accept or deny such referral or subsequent services. Please refer to Items 5, 10 and 12 for additional information with respect to our offerings/services and the potential conflicts of interest they present.

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. We benefit from the products and services provided because the cost of these services would otherwise be borne directly by us, and this creates a conflict. You should consider these conflicts of interest when selecting a custodian. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices).

#### **Item 15 - Custody**

Accounts will be maintained by an unaffiliated, custodian. Assets are not maintained by our firm or any associated person of the firm. In keeping with this policy involving our clients' funds or securities, Dorval & Chorne Financial Advisors:

- Restricts the firm or an associate from serving as trustee or having general power of attorney over a client account,
- Prohibits any associate from having authority to directly withdraw securities or cash assets from a client account. Although the firm is deemed to have custody since it may request the withdrawal of advisory fees from an account, this will only be accomplished through the engagement of a custodian maintaining your account assets in your name, via your prior written approval, and following our firm's delivery of its invoice (see Item 5 for details),
- Does not accept or forward client securities (i.e., stock certificates) erroneously delivered to our advisory firm,
- Prohibits an associate from having client bank or investment account access user identification and passwords, and
- Will not collect advance fees of \$500 or more for services that are to be performed six months or more into the future.

Under securities regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct the custodian of record to deduct our advisory fees directly from your account. The custodian of record maintains actual custody of your assets.

The custodian of record will provide the client with investment account transaction confirmations and account statements, which will include debits and credits for each period. Statements are provided on at least a quarterly basis or as transactions occur within the client's account. Our advisory firm does not create its own separate account statement for a client nor does it serve as the sole recipient of a client account statement. Clients should carefully review statements received from the custodian.

Clients are reminded that if they receive a report from any source that includes investment performance information, they are urged to carefully review and compare the report with their account statements that

they have received directly from their custodian of record.

#### **Item 16 - Investment Discretion**

Our advisory firm offers both discretionary and non-discretionary portfolio management. For accounts under discretionary management, the firm maintains discretion over Client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to Clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the Client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the Client.

For accounts under non-discretionary management, such trading authority requires your ongoing prior approval involving the investment and reinvestment of account assets, as well as portfolio rebalancing. You will be required to execute our firm's client services agreement that describes our limited account authority, as well as the custodian of record's account opening document that includes their limited power of attorney form or clause. Please note that, in light of the requirement for your pre-approval, you must make yourself available and keep our firm updated on your contact information so that instructions can be efficiently and timely effected on your behalf.

#### **Item 17 - Voting Client Securities**

Account holders may periodically receive proxies or other similar solicitations sent directly from their custodian or transfer agent. If we receive a duplicate copy, we do not normally forward these or any correspondence relating to the voting of your securities, class action litigation, or other corporate actions. Account holders will receive their proxies or other solicitations directly from their custodian or transfer agent.

Our firm does not vote proxies on behalf of an account holder. The firm does not offer guidance on how to vote proxies, nor will guidance be offered involving a claim or potential claim in a bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets. Dorval & Chorne Financial Advisors personnel will answer limited questions with respect to what a proxy voting request or other corporate matter may be and how to reach the issuer or their legal representative.

Each account holder maintains responsibility for directing the manner in which proxies solicited by issuers of securities that are beneficially owned shall be voted, as well as making all other elections relative to mergers, acquisitions, tender offers or other legal matters or events pertaining to holdings. Clients should consider contacting the issuer or their legal counsel involving specific questions they may have with respect to a particular proxy solicitation or corporate action.

#### **Item 18 - Financial Information**

Fee withdrawals must be done through a qualified intermediary (e.g., your custodian of record) following your written agreement.

Engagements with our firm do not require the collection of fees from you of \$500 or more for our advisory services that have been agreed to be performed six months or more into the future.

Neither Dorval & Chorne Financial Advisors nor its management serve as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or

beneficiaries of the trust.

The firm and its management do not have a financial condition likely to impair its ability to meet commitments to clients, nor has the firm and its management been the subject of a bankruptcy petition.

Due to the nature of the firm's advisory services and operational practices, an audited balance sheet is not required nor included in this brochure.

#### **Item 19 - Requirements for State-Registered Advisers**

Principal Executives and Management Persons - Daniel J. Dorval, CFP® and John T. Chorne, CFP®. Please see Item 4 of this brochure and the cover page (Item 1) of the accompanying Form ADV Part 2B brochure supplements for our firm's principals.

Other Business Activities - Dually registered investment adviser representatives and insurance agents. Please refer to Items 5 and 10 of this firm brochure and Items 2 and 4 of the accompanying Form ADV Part 2B brochure supplements for our firm principals.

Performance-Based Fees - Please see Item 6 of this brochure and Item 5 of the accompanying Form ADV Part 2B that is provided with this firm brochure. Neither the firm nor its management is compensated based on performance-based fees. It is perceived that performance-based compensation may create an incentive for an adviser to recommend an investment that may carry a higher degree of risk to a client, an activity contrary to the firm's business practices.

Material Disclosure Matters involving Firm Management - Please refer to Item 9 of this firm brochure and Items 3 and 7 of the accompanying Form ADV Part 2B supplement that accompanies this brochure. With the exception of response below, the firm's management has not been the subject of an award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- fraud, false statement(s), or omissions,
- theft, embezzlement, or other wrongful taking of property,
- bribery, forgery, counterfeiting, or extortion, or
- dishonest, unfair, or unethical practices.

In 2010, Mr. Dorval had been the subject of a settlement with a client involving a variable annuity, details of which is described in Item 7 of his Form ADV Part 2B brochure supplement.

Firm management has not been the subject of an award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- an investment or an investment-related business or activity,
- fraud, false statement(s), or omissions,
- theft, embezzlement, or other wrongful taking of property,
- bribery, forgery, counterfeiting, or extortion, or
- dishonest, unfair, or unethical practices.

Material Relationship with an Issuer of a Security - Please refer to Item 10 of this firm brochure and Item 4 of the accompanying Form ADV Part 2B brochure supplement. Firm management does not have a material relationship with the issuer of a security.