

## **FIDUCIARY FAMILY OFFICE, LLC**

*a Registered Investment Adviser*

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Firm Website To Be Determined

This brochure provides information about the qualifications and business practices of Fiduciary Family Office, LLC (hereinafter “Fiduciary Family Office” or the “Firm”). If you have any questions about the contents of this brochure, please contact the Firm at the telephone number listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Additional information about the Firm is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The Firm is a registered investment adviser. Registration does not imply any level of skill or training.

**Item 2. Material Changes**

In this Item, Fiduciary Family Office is required to discuss any material changes that have been made to the brochure since the last annual amendment. The Firm has updated Item 4 to reflect that it is no longer relying on an SEC registration exemption and has more than the requisite amount of assets under management for a Large Advisor. There are no other material changes to disclose.

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## Item 4. Advisory Business

Fiduciary Family Office offers a variety of advisory services, which include financial planning, consulting, and investment management services. Prior to Fiduciary Family Office rendering any of the foregoing advisory services, clients are required to enter into one or more written agreements with Fiduciary Family Office setting forth the relevant terms and conditions of the advisory relationship (the “Advisory Agreement”).

Fiduciary Family Office filed for registration as an investment adviser in May 2023 and is owned by Kathleen Grace and Tabitha LeTourneau Meyerer. As of September 30, 2023, Fiduciary Family Office had \$451,647,127 assets under management, all of which were managed on a discretionary basis.

While this brochure generally describes the business of Fiduciary Family Office, certain sections also discuss the activities of its Supervised Persons, which refer to the Firm’s officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees or other persons who provide investment advice on Fiduciary Family Office’s behalf and are subject to the Firm’s supervision or control.

### Financial Planning and Consulting Services

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Fiduciary Family Office offers clients a broad range of financial planning, family office, and consulting services, which include any or all of the following functions:

- Business Planning
- Cash Flow Planning
- Trust and Estate Planning
- Financial Reporting
- Investment Consulting
- Insurance Planning
- Retirement Planning
- Risk Management
- Charitable Giving
- Distribution Planning
- Tax Planning
- Education Planning

While each of these services is available on a stand-alone basis, certain of them can also be rendered in conjunction with investment portfolio management as part of a comprehensive wealth management engagement (described in more detail below).

### *Family Office Services*

The Firm can also be engaged to provide Family Office Services which may include, but are not limited to, the following services:

- Oversight and coordination of estate, income tax, cash flow, risk management and investment strategies with the client's other advisors
- Cash management services, track and monitor cash flow
- Liaison to banking services and relationships
- Analysis of financial issues
- Assist with planning for future cash flow needs
- Risk management/insurance review consulting
- Financial statement recordkeeping, compilation of books, reports
- Review and/or negotiate with client's vendors and services providers to help determine the best options for the client
- General financial advice
- Other services not specific to investment management

In performing the financial planning, consulting and family office services, Fiduciary Family Office is not required to verify any information received from the client or from the client's other professionals (e.g., attorneys, accountants, etc.) and is expressly authorized to rely on such information. Fiduciary Family Office recommends certain clients engage the Firm for additional related services, its Supervised Persons in their individual capacities as insurance agents and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists for the Firm to recommend that clients engage Fiduciary Family Office or its affiliates to provide (or continue to provide) additional services for compensation, including investment management services. Clients retain absolute discretion over all decisions regarding implementation and are under no obligation to act upon any of the recommendations made by Fiduciary Family Office under a financial planning, consulting or family office services engagement. Clients are advised that it remains their responsibility to promptly notify the Firm of any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising Fiduciary Family Office's recommendations and/or services.

### **Investment and Wealth Management Services**

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Fiduciary Family Office manages client investment portfolios on a discretionary basis. In addition, Fiduciary Family Office provides certain clients with wealth management services which include a broad range of financial planning and consulting services as well as discretionary management of investment portfolios.

Fiduciary Family Office primarily allocates client assets among various exchange-traded funds (“ETFs”), individual stocks, bonds, options, alternative investments, mutual funds, and/or independent investment managers (“Independent Managers”) in accordance with their stated investment objectives.

Where appropriate, the Firm also provides advice about any type of legacy position or other investment held in client portfolios, but clients should not assume that these assets are being continuously monitored or otherwise advised on by the Firm unless specifically agreed upon. Clients can engage Fiduciary Family Office to manage and/or advise on certain investment products that are not maintained at their primary custodian, including but not limited to alternative investments, variable life insurance and annuity contracts and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, Fiduciary Family Office directs or recommends the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company or the custodian designated by the product’s provider.

Fiduciary Family Office tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. Fiduciary Family Office consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of their portfolios. Clients are responsible to promptly notify Fiduciary Family Office if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients can impose reasonable restrictions or mandates on the management of their accounts if Fiduciary Family Office determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm’s management efforts.

### **Use of Independent Managers**

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As mentioned above, Fiduciary Family Office selects certain Independent Managers to actively manage a portion of its clients’ assets. The specific terms and conditions under which a client engages an Independent Manager are set forth in a separate written agreement with the designated Independent Manager. That agreement can be between the Firm and the Independent Manager (often called a subadvisor) or the client and the Independent Manager (sometimes called a separate account manager). In addition to this brochure, clients will typically also receive the written disclosure documents of the respective Independent Managers engaged to manage their assets.

Fiduciary Family Office evaluates a variety of information about Independent Managers, which includes the Independent Managers’ public disclosure documents, materials supplied by the Independent Managers themselves and other third-party analyses it believes are reputable. To the extent possible, the Firm seeks to assess the Independent Managers’ investment strategies, past performance and risk results in relation to its clients’ individual portfolio allocations and risk exposure. Fiduciary Family Office also takes qualitative and quantitative factors into consideration, including each Independent Manager’s management style,

management team, organizational structure, financial statements, returns, reputation, financial strength, reporting, pricing and research capabilities, among other factors.

Fiduciary Family Office continues to provide services relative to the discretionary selection of the Independent Managers. On an ongoing basis, the Firm monitors the performance of those accounts being managed by Independent Managers. Fiduciary Family Office seeks to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests.

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

Fiduciary Family Office offers services on a fee basis, which includes fixed and hourly fees, as well as fees based upon assets under management. Additionally, certain of the Firm's Supervised Persons, in their individual capacities, offer insurance products under a separate commission-based arrangement, which will be disclosed in advance.

### **Financial Planning and Consulting Fees**

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Fiduciary Family Office charges a fixed and/or hourly fee for providing financial planning and consulting services. These fees are negotiable but range from \$30,000 to \$250,000 on a fixed fee basis and/or from \$350 to \$600 on an hourly basis, depending upon the scope and complexity of the services and the professional rendering the financial planning and/or the consulting services. The fee can be for a defined project, such as the delivery of a plan, or for ongoing services. If the client engages the Firm for additional investment advisory services, Fiduciary Family Office can choose to, in its sole discretion, offset all or a portion of its fees for those services based upon the amount paid for the financial planning and/or consulting services.

The terms and conditions of the financial planning and/or consulting engagement are set forth in the Advisory Agreement. For project-based services Fiduciary Family Office requires one-half of the fee (estimated hourly or fixed) payable upon execution of the Advisory Agreement. The outstanding balance is due upon delivery of the financial plan or completion of the agreed upon services. Ongoing services are charged as described in the investment management section, below. The Firm does not, however, take receipt of \$1,200 or more in prepaid fees, six or more months in advance of services rendered.

### **Investment Management Fees**

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Fiduciary Family Office offers investment management services for an annual fee based on the amount of assets under the Firm's management. This management fee typically varies between 50 and 150 basis

points (0.50% – 1.50%), depending upon the size and composition of a client's portfolio, the type and amount of services rendered and the individual(s) providing the services.

The annual fee is prorated and charged quarterly, in advance, based upon the market value of the assets being managed by Fiduciary Family Office on the last day of the previous quarter as determined by a party independent from the Firm (including the client's custodian or another third-party). The Firm can also change a fixed fee for wealth management services which can include the services for the financial planning / consulting services and/or the investment management services. The fixed fee will be individually negotiated and will be based upon a number of factors including scope of work, the size and composition of a client's portfolio, the type and amount of services rendered and the individual(s) providing the services.

The Firm includes cash in a client's account in determining the valuation for billing purposes. If assets are deposited into or withdrawn from an account after the inception of a billing period, the fee payable with respect to such assets is not adjusted to reflect the interim change in portfolio value. For the initial period of an engagement, the fee is calculated on a *pro rata* basis. In the event the advisory agreement is terminated (which must be done in writing with 30 days notice), the fee for the final billing period is prorated through the effective date of the termination and the outstanding or unearned portion of the fee is charged or refunded to the client, as appropriate.

Additionally, for asset management services the Firm provides with respect to certain client holdings (e.g., held-away assets, accommodation accounts, alternative investments, etc.), Fiduciary Family Office can negotiate a fee rate that differs from the range set forth above. Clients are advised that a conflict of interest exists for the Firm to recommend that clients engage Fiduciary Family Office for additional services for compensation, including rolling over retirement accounts or moving other assets to the Firm's management. Clients retain absolute discretion over all decisions regarding engaging the Firm and are under no obligation to act upon any of the recommendations.

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### **Fee Discretion**

Fiduciary Family Office may, in its sole discretion, negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship, account retention, pro bono activities, or competitive purposes.

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### **Additional Fees and Expenses**

In addition to the advisory fees paid to Fiduciary Family Office, clients also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively "Financial Institutions"). These additional charges include securities brokerage commissions, transaction fees, custodial fees, fees attributable to alternative assets, fees charged by the



Independent Managers, margin and other borrowing costs, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. The Firm's brokerage practices are described at length in Item 12, below.

In addition, although a fee amount may be specifically agreed to, the Firm reserves the right to charge additional fees for work performed which was not previously contemplated as of the date of executing an Advisory Agreement. In the Firm's sole discretion, it may bill an hourly rate described above for the additional services. Clients will be notified of such an adjustment in writing, with 30 days advance notice to Client prior to the commencement of services.

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**Direct Fee Debit**

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Clients provide Fiduciary Family Office and/or certain Independent Managers with the authority to directly debit their accounts for payment of the investment advisory fees. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to Fiduciary Family Office. Alternatively, clients may elect to have Fiduciary Family Office send a separate invoice for direct payment.

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**Use of Margin**

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The Firm does not recommend that clients use margin for investment purposes. Where the client has requested the Fiduciary Family Office to use margin in the management of the client's investment portfolio, the fee payable will be assessed based upon the gross of margin value such that the long market value of the client's account will be utilized to calculate the investment advisory fee.

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**Account Additions and Withdrawals**

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Clients can make additions to and withdrawals from their account at any time, subject to Fiduciary Family Office's right to terminate an account. Additions can be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or declines to accept particular securities into a client's account. Clients can withdraw account assets on notice to Fiduciary Family Office, subject to the usual and customary securities settlement procedures. However, the Firm designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives. Fiduciary Family Office may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to

transaction fees, short-term redemption fees, fees assessed at the mutual fund level (e.g., contingent deferred sales charges) and/or tax ramifications.

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

Fiduciary Family Office does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client's assets).

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

Fiduciary Family Office offers services to individuals, trusts, estates, charitable organizations, foundations, corporations and other business entities.

### **Minimum Account Value and Fee**

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As a condition for starting and maintaining an investment management relationship, Fiduciary Family Office imposes a minimum annual fee of \$20,000 (assessed quarterly, pro rata) and a minimum portfolio value of \$2,000,000. Fiduciary Family Office may, in its sole discretion, charge a lesser minimum fee and accept clients with smaller portfolios based upon certain criteria, including anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, and pro bono activities. The minimum fee will cause clients with smaller portfolios to incur an effective fee rate that is higher than the Firm's stated fee. Fiduciary Family Office only accepts clients with less than the minimum portfolio size if the Firm determines the smaller portfolio size will not cause a substantial increase of investment risk beyond the client's identified risk tolerance. Fiduciary Family Office may, in its sole discretion, aggregate the portfolios of family members to meet the minimum portfolio size.

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

### **Methods of Analysis Investment Strategies**

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Portfolios are managed with a focus on maintaining and increasing their wealth and income. The primary objective during periods of greater volatility is to mitigate downside risk. A secondary objective is to receive a good return with reasonable volatility (risk) during good times. Fiduciary Family Office designs global

investment portfolios with a multi-strategy approach. To do this, the Firm may invest globally in equities/stocks, bonds, currencies, commodities, alternative investments, fixed income strategies, options and cash. The Firm sometimes uses protection strategies with the objective of reducing portfolio volatility. Such strategies may include tactical portfolio shifts (short and intermediate adjustments that vary from the expected long term allocation), larger allocations to cash and/or other downside protection strategies using options or inverse hedging positions (which move in the opposite direction of the underlying market which they track).

Fiduciary Family Office combines its approach with an Asset Allocation methodology and research with consideration of absolute return strategies, long-only strategies, long/short strategies, cash flow strategies, and economic opportunities. Asset Allocation is the process of selecting a mix of asset classes and the allocation of capital to a mix of assets in consideration of the client's goals and objectives concurrent with their tolerance for risk. Risk tolerance is an investor's ability or willingness to endure declines in the value of their investment portfolio in an attempt to achieve their long term objectives.

The ultimate objective is to build an appropriate mix that will help a client achieve their short and long term goals. Asset Allocation provides diversification by distributing client investment dollars among many asset classes, such as, but not limited to, domestic equities, international equities, cash flow strategies, absolute return strategies, new economic opportunities, domestic bonds, international bonds, cash equivalents, real estate, and other asset classes. In general, the Firm believes that greater diversification allows the portfolio to perform over time and throughout various market cycles.

Once the initial planning is complete Fiduciary Family Office then creates an Investment Policy Statement. This is a mutually agreed upon document outlining the parameters in which the portfolio will be managed over time. This Investment Policy Statement is prepared by understanding a clients' objectives, tolerance and capacity for risk, overall financial situation, and any restrictions and/or conditions imposed by the client. Once the Investment Policy Statement is in place, the Firm then begins the implementation process over a timeframe dependent upon client circumstances as well as current market conditions. The Firm's asset implementation considers both strategic and tactical portfolio rebalancing to attempt to control the desired level of principal risk.

Strategic asset allocation refers to the dividing of investments among different asset classes in an attempt to best capture the risk to reward trade-off consistent with the client's specific situation and goals. Strategic rebalancing is the rebalancing of the portfolio to the long term strategic allocation mix. Tactical asset allocation is a method of investing in which the asset allocation is modified according to the opportunities of the markets in which they are invested. Such tactical allocations may be used to exploit market disequilibrium that may emerge, take advantage of perceived economic opportunity, or control portfolio risk.

Within the parameters of the Investment Policy Statement, Fiduciary Family Office has the discretion to make changes to the allocation from time to time, based on changing economic circumstances, fundamental analysis, technical analysis and/or the various relative investment opportunities. These tactical allocation changes may be short, intermediate, or long term changes. While the Firm takes into consideration each client's specific objectives, risk tolerance, time horizon, restrictions and personal needs, the Firm may use a variety of investment types, vehicles and strategies to implement the asset allocation decision. Investment types that Fiduciary Family Office may consider, without limitation, for client accounts include individual securities (both US and foreign stocks and bonds), corporate debt securities, municipal securities, United States government securities, commercial paper, certificates of deposit, precious metals and commodities, options, and preferred stocks.

Investment vehicles that Fiduciary Family Office may consider, without limitation, for client accounts include individual securities, exchange traded funds (ETFs), exchange traded notes (ETNs), closed end funds (CEFs), REITs (mortgage or real estate REITs), mutual funds, structured notes, fund of fund hedge funds, hedge funds, commercial mortgage backed securities, asset backed securities, unit investment trusts, limited partnerships, and deferred annuities.

Investment strategies Fiduciary Family Office may use include, without limitation, cash flow strategies, absolute return strategies, long only strategies, long/short strategies, and various alternative investments strategies. Such alternative investments may include statistical arbitrage, risk arbitrage, convertible arbitrage, alternative fixed income arbitrage, options, market timing, macro-economic, inverse hedging, emerging market, and country specific investment strategies. Fiduciary Family Office may also recommend the use of short sales, trading (securities sold within 30 days), margin transactions, or option strategies. Investments that may be considered risky if not combined in an appropriate consideration to the risk of the overall portfolio.

When determining the investments and strategies used to implement a client's investment portfolio, Fiduciary Family Office may use research developed internally and externally utilizing various sources of information. Such sources may include statistical analysis software, financial newsletters, recommendations from analysts and consultants, financial news online and in print, research materials prepared by third parties, corporate rating services, company press releases, inspection of corporate activities, annual reports, prospectuses, filings with the Securities and Exchange Commission, timing and charting services, cyclical trends, and/or statistical analysis.

Investment types and vehicles referenced above shall be chosen with consideration for some of the following criteria:

- Past performance, considered relative to other investments having the same investment objective or category (style)
- Risk adjusted return

- The historical volatility
- The investment style and discipline of the proposed manager if applicable
- Investment opportunity
- How the investment complements other assets in the portfolio
- The current economic environment
- Fundamental or technical analysis or a combination
- Quantitative analysis
- Qualitative analysis factors such as, but not limited to, review of the firm's philosophy and investment process, the people that work at the firm, the firm's business plans, the products they offer, and how they develop new ideas
- The likelihood of future investment success, relative to other opportunities
- Fees

### **Methods of Analysis Investment Strategies**

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#### *Cash/Cash Equivalents*

May include pooled investment vehicles, such as money market funds. US agencies or government securities, bank certificates of deposit (either purchased directly from banks or brokerage firms).

#### *Stocks and Other Equity Vehicles*

Common stock investments may be in individual securities, separate account money managers, or in pooled investment vehicles, such as publicly traded open-end mutual funds, closed-end investment companies, Real Estate Investment Trusts, or exchange traded funds providing daily asset valuations. Such investments may include focus on any size domestic or non-U.S. stock.

#### *Bonds and Other Fixed Income Vehicles*

Investment in bonds and similar fixed income instruments may be in individual bonds, separate account managers, preferreds, or pooled investment vehicles, such as publicly traded open-end mutual funds, closed-end investment companies, Real Estate Investment Trusts, Commercial Mortgage Backed Securities, Asset Backed Securities, or exchange traded funds. Such vehicles may or may not provide daily valuations.

#### *Alternative Investments and Additional Investments*

Fiduciary Family Office considers alternative investments as those investment assets that do not "fit" into the traditional investment classes such as stocks, bonds or cash. When appropriate to the needs and risk tolerance of the client, Fiduciary Family Office may use alternative investments in client portfolios. Such

investments may include all alternative investment strategies, either publicly available or limited in scope and therefore not available to the general public. Such vehicles may or may not provide daily valuations.

### **Risk of Loss**

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The following list of risk factors does not purport to be a complete enumeration or explanation of the risks involved with respect to the Firm's investment management activities. Clients should consult with their legal, tax, and other advisors before engaging the Firm to provide investment management services on their behalf.

Investing in securities involves risk of loss that you should be prepared to bear. Fiduciary Family Office does not represent or guarantee that its services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. Fiduciary Family Office cannot offer any guarantees or promises that a client's financial goals and objectives will be met. Diversification does not assure against market loss. Past performance does not guarantee future results.

#### *Principal Risks Regarding Methods of Analysis and Investment Strategies*

While Fiduciary Family Office attempts to manage the risks of investment portfolios with its multi-strategy diversified approach, investment portfolios are still subject to a number of risks associated with the investment holdings. Portfolios that contain domestic and foreign stocks may be subject to, but not limited the following risks:

- Stock Market Risk - The chance that stock prices overall will decline.
- Currency Risk - The chance that the value of foreign stocks, measured in U.S. dollars, will decrease because of unfavorable changes in currency exchange rates.
- Country Risk - The chance that world events - such as political upheaval, financial troubles, or natural disasters - will adversely affect the value of securities issued by companies in foreign countries.
- Firm Specific Risk - The risk associated with owning a single company stock that may be negatively affected by different factors than the overall stock market. Some examples include negative publicity, product failure or recalls, or bankruptcy.
- Portfolios containing bonds are subject to, but not limited to, the following risks:
  - Interest rate risk - The chance that bond prices overall will decline because of rising interest rates.
  - Credit risk - The chance that a bond issuer will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make sure payments will cause the price of the bond to decline, thus reducing the investor's total return.

- Income Risk - The chance that an underlying fund's income will decline because of falling interest rates.
- Call Risk - The chance that during periods of falling interest rates, issuers of callable bonds may call (repay) securities with higher coupons or interest rates before their maturity dates.
- Reinvestment Risk - The chance that investors would be forced to reinvest the proceeds of a bond that was called or matured at a lower rate than previously invested, resulting in a decline in the underlying portfolio's income.

Other risks, without limitation, that may be part of various client investment holdings or strategies include the following:

- Liquidity Risk- The inability to sell an investment position at the expected price.
- Lack of Marketability Risk - The inability to sell an investment. Lack of marketability may be due to investment lock-up periods.
- Asset Allocation Risk - The risk that the allocation of investments to various asset classes may negatively impact the performance of the portfolio when one or more of the asset classes are performing poorly in comparison to other asset classes.
- Leverage Risk - Since leverage magnifies both gains and losses, an investment that uses leverage can expose the investor to a greater loss if the investment moves against the investor, than it would have been if the investment had not been leveraged.
- Derivatives Risk- The risk of investing in derivative instruments, including liquidity, interest rate, market, credit and management risks, mispricing or improper valuation. Changes in the value of the derivative may not correlate perfectly with the underlying asset, rate or index, and a fund or investment manager utilizing derivatives could lose more than the principal amount invested.
- Inflation Risk - Inflation may reduce the purchasing power of stocks and fixed income securities, cause volatility in the markets, and devalue the income on interest-bearing securities.
- Manager Risk - The chance that poor security or money manager selection will cause the client's portfolio to underperform.
- Mortgage-Related and Other Asset-Backed Risk - The risks of investing in mortgage-related and other asset-backed securities, including interest rate risk, extension risk, and prepayment risk.
- Operational Risk - The risk that deficiencies in information systems or internal controls, human errors or management failures will result in investment losses.
- Portfolios containing alternative investments may be subject to any or all of the risks mentioned above. Any investment vehicles which provide a prospectus, offering memorandum, or other related documents may provide a more detailed discussion of risks associated with that investment.

#### *Market Risks*

Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The profitability of a significant portion of Fiduciary Family Office's recommendations

and/or investment decisions may depend to a great extent upon correctly assessing the future course of price movements of stocks, bonds and other asset classes. In addition, investments may be adversely affected by financial markets and economic conditions throughout the world. There can be no assurance that Fiduciary Family Office will be able to predict these price movements accurately or capitalize on any such assumptions.

#### *Volatility Risks*

The prices and values of investments can be highly volatile, and are influenced by, among other things, interest rates, general economic conditions, the condition of the financial markets, the financial condition of the issuers of such assets, changing supply and demand relationships, and programs and policies of governments.

#### *Cash Management Risks*

The Firm may invest some of a client's assets temporarily in money market funds or other similar types of investments, during which time an advisory account may be prevented from achieving its investment objective.

#### *Mutual Funds and ETFs*

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

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

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for index-based ETFs and potentially more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 20,000 shares



or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

Finally, some mutual funds and ETFs may have lock-up periods that restrict an investor from selling their position for a period of time. Other mutual funds and ETFs could also have early redemption fees that are taken if the investor sells their position before a certain amount of time.

If available, Fiduciary Family Office uses institutional share class mutual funds or other share classes that the Firm believes are in the client's best interest.

#### *Use of Independent Managers*

As stated above, Fiduciary Family Office selects certain Independent Managers to manage a portion of its clients' assets. In these situations, Fiduciary Family Office continues to conduct ongoing due diligence of such managers, but such recommendations rely to a great extent on the Independent Managers' ability to successfully implement their investment strategies. In addition, Fiduciary Family Office does not have the ability to supervise the Independent Managers on a day-to-day basis.

#### *Use of Alternative Investments*

Fiduciary Family Office recommends that certain clients invest in securities that are deemed "alternative investments." Alternative investments have different risks depending on the specific investment. The risks of each are generally disclosed in the prospectus or other offering documents that clients will receive or can request.

#### *Use of Margin*

While the use of margin borrowing for investments can substantially improve returns, it may also increase overall portfolio risk. Margin transactions are generally effected using capital borrowed from a Financial Institution, which is secured by a client's holdings. Under certain circumstances, a lending Financial Institution may demand an increase in the underlying collateral. If the client is unable to provide the additional collateral, the Financial Institution may liquidate account assets to satisfy the client's outstanding obligations, which could have extremely adverse consequences. In addition, fluctuations in the amount of a client's borrowings and the corresponding interest rates may have a significant effect on the profitability and stability of a client's portfolio.

#### *Currency Risks*

An advisory account that holds investments denominated in currencies other than the currency in which the advisory account is denominated may be adversely affected by the volatility of currency exchange rates.

*Interest Rate Risks*

Interest rates may fluctuate significantly, causing price volatility with respect to securities or instruments held by clients.

*Options*

Options allow investors to buy or sell a security at a contracted “strike” price at or within a specific period of time. Clients may pay or collect a premium for buying or selling an option. Investors transact in options to either hedge (i.e., limit) losses in an attempt to reduce risk or to speculate on the performance of the underlying securities. Options transactions contain a number of inherent risks, including the partial or total loss of principal in the event that the value of the underlying security or index does not increase/decrease to the level of the respective strike price. Holders of options contracts are also subject to default by the option writer which may be unwilling or unable to perform its contractual obligations.

**Item 9. Disciplinary Information**

Fiduciary Family Office has not been involved in any legal or disciplinary events to disclose.

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

This item requires investment advisers to disclose certain financial industry activities and affiliations.

**Licensed Insurance Agents**

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A number of the Firm’s Supervised Persons are licensed insurance agents and offer certain insurance products on a fully-disclosed commissionable basis. A conflict of interest exists to the extent that Fiduciary Family Office recommends the purchase of insurance products where its Supervised Persons are entitled to insurance commissions or other additional compensation. The Firm seeks to ensure that all recommendations are made in its clients’ best interest regardless of any such affiliations.

**Item 11. Code of Ethics**

Fiduciary Family Office has adopted a code of ethics in compliance with applicable securities laws (“Code of Ethics”) that sets forth the standards of conduct expected of its Supervised Persons. Fiduciary Family

Office's Code of Ethics contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by the Firm or any of its Supervised Persons and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

The Code of Ethics also requires certain of Fiduciary Family Office's personnel to report their personal securities holdings and transactions and obtain pre-approval of certain investments (e.g., initial public offerings, limited offerings). However, the Firm's Supervised Persons are permitted to buy or sell securities that it also recommends to clients if done in a fair and equitable manner that is consistent with the Firm's policies and procedures. This Code of Ethics has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by certain personnel to be completed without any appreciable impact on the markets of such securities. Therefore, under limited circumstances, exceptions may be made to the policies stated below.

When the Firm is engaging in or considering a transaction in any security on behalf of a client, no Supervised Person with access to this information may knowingly effect for themselves or for their immediate family (i.e., spouse, minor children and adults living in the same household) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the Supervised Person is completed as part of a batch trade with clients; or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by money market funds; and iv) shares issued by other unaffiliated open-end mutual funds.

Clients and prospective clients may contact Fiduciary Family Office to request a copy of its Code of Ethics by contacting the Firm at the phone number on the cover page of this brochure.

## **Item 12. Brokerage Practices**

### **Recommendation of Broker-Dealers for Client Transactions**

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Fiduciary Family Office recommends that clients utilize the custody, brokerage and clearing services of Charles Schwab & Co, Inc. through its Schwab Advisor Services division ("Schwab" or "Custodian") for investment management accounts. The final decision to custody assets with Custodian is at the discretion

of the client, including those accounts under ERISA or IRA rules and regulations, in which case the client is acting as either the plan sponsor or IRA accountholder. Fiduciary Family Office is independently owned and operated and not affiliated with Custodian . Custodian provides Fiduciary Family Office with access to its institutional trading and custody services, which are typically not available to retail investors.

Factors which Fiduciary Family Office considers in recommending Custodian or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. The commissions and/or transaction fees charged by Custodian may be higher or lower than those charged by other Financial Institutions.

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

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

Fiduciary Family Office periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to obtain best execution.

#### **Software and Support Provided by Financial Institutions**

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Fiduciary Family Office receives without cost from Schwab administrative support, computer software, related systems support, as well as other third party support as further described below (together "Support") which allow Fiduciary Family Office to better monitor client accounts maintained at Schwab and otherwise conduct its business. Fiduciary Family Office receives the Support without cost because the Firm renders investment management services to clients that maintain assets at Schwab. The Support is not provided in connection with securities transactions of clients (i.e., not "soft dollars"). The Support benefits Fiduciary Family Office, but not its clients directly. Clients should be aware that Fiduciary Family Office's receipt of economic benefits such as the Support from a broker-dealer creates a conflict of interest since these

benefits will influence the Firm's choice of broker-dealer over another that does not furnish similar software, systems support or services. In fulfilling its duties to its clients, Fiduciary Family Office endeavors at all times to put the interests of its clients first and has determined that the recommendation of Schwab is in the best interest of clients and satisfies the Firm's duty to seek best execution.

Specifically, Fiduciary Family Office receives the following benefits from Schwab: i) receipt of duplicate client confirmations and bundled duplicate statements; ii) access to a trading desk that exclusively services its institutional traders; iii) access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and iv) access to an electronic communication network for client order entry and account information.

These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a certain amount of the advisor's clients' assets are maintained in accounts at Schwab. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to the Firm other products and services that benefit the Firm but may not benefit its clients' accounts. These benefits may include national, regional or Firm specific educational events organized and/or sponsored by Schwab. Other potential benefits may include occasional business entertainment of personnel of Fiduciary Family Office by Schwab personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist Fiduciary Family Office in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of the Firm's fees from its clients' accounts, and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of the Firm's accounts, including accounts not maintained at Schwab. Schwab also makes available to Fiduciary Family Office other services intended to help the Firm manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to the Firm

by independent third parties. Schwab may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to the Firm. While, as a fiduciary, Fiduciary Family Office endeavors to act in its clients' best interests, the Firm's recommendation that clients maintain their assets in accounts at Schwab may be based in part on the benefits received and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which creates a potential conflict of interest.

### **Brokerage for Client Referrals**

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Fiduciary Family Office does not consider, in selecting or recommending broker-dealers, whether the Firm receives client referrals from the Financial Institutions or other third party.

### **Directed Brokerage**

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The client may direct Fiduciary Family Office in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution and the Firm will not seek better execution services or prices from other Financial Institutions or be able to "batch" client transactions for execution through other Financial Institutions with orders for other accounts managed by Fiduciary Family Office (as described above). As a result, the client may pay higher commissions or other transaction costs, greater spreads or may receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, Fiduciary Family Office may decline a client's request to direct brokerage if, in the Firm's sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

### **Trade Aggregation**

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Transactions for each client will be effected independently, unless Fiduciary Family Office decides to purchase or sell the same securities for several clients at approximately the same time. Fiduciary Family Office may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Firm's clients differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and allocated among Fiduciary Family Office's clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that the Firm determines to aggregate client orders for the purchase or sale of securities, including securities in which Fiduciary Family Office's Supervised Persons may invest, the Firm does so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. Fiduciary Family Office does not receive any additional compensation or remuneration as a result of the aggregation.

In the event that the Firm determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, the Firm may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

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

### **Account Reviews**

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Fiduciary Family Office monitors client portfolios on a continuous and ongoing basis and regular account reviews are conducted on at least an annual basis. Such reviews are conducted by the Firm's investment adviser representatives. All investment advisory clients are encouraged to discuss their needs, goals and objectives with Fiduciary Family Office and to keep the Firm informed of any changes thereto.

### **Account Statements and Reports**

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Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions where their assets are custodied. On a quarterly basis, clients also receive written or electronic reports from Fiduciary Family Office and/or an outside service provider, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. Clients should compare the account statements they receive from their custodian with any documents or reports they receive from Fiduciary Family Office or an outside service provider.

## Item 14. Client Referrals and Other Compensation

### Client Referrals

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The Firm does not currently provide compensation to any third-party solicitors for client referrals.

### Other Compensation

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The Firm receives economic benefits from Schwab. The benefits, conflicts of interest and how they are addressed are discussed above in response to Item 12.

## Item 15. Custody

Fiduciary Family Office is deemed to have custody of client funds and securities because the Firm is given the ability to debit client accounts for payment of the Firm's fees. As such, client funds and securities are maintained at one or more Financial Institutions that serve as the qualified custodian with respect to such assets. Such qualified custodians will send account statements to clients at least once per calendar quarter that typically detail any transactions in such account for the relevant period.

In addition, as discussed in Item 13, Fiduciary Family Office will also send, or otherwise make available, periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the Financial Institutions and compare them to those received from Fiduciary Family Office. Any other custody disclosures can be found in the Firm's Form ADV Part 1.

### Surprise Independent Examination

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As Fiduciary Family Office is deemed to have custody over clients' cash, bank accounts or securities (for reasons other than those discussed above), the Firm is required to engage an independent accounting Firm to perform a surprise annual examination of those assets and accounts over which it maintains custody. Any related opinions issued by an independent accounting Firm are filed with the SEC and are publicly available on the SEC's Investment Adviser Public Disclosure website. Fiduciary Family Office does not have direct access to client funds as they are maintained with an independent qualified custodian.

### Standing Letters of Authorization

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Fiduciary Family Office will have custody due to clients giving the Firm limited power of attorney in a standing letter of authorization ("SLOA") to disburse funds to one or more third parties as specifically designated by the client. In such circumstances, the Firm will implement the steps in the SEC's no-action



letter on February 21, 2017 which includes (in summary): i) client will provide instruction for the SLOA to the custodian; ii) client will authorize the Firm to direct transfers to the specific third party; iii) the custodian will perform appropriate verification of the instruction and provide a transfer of funds notice to the client promptly after each transfer; iv) the client will have the ability to terminate or change the instruction; v) the Firm will have no authority or ability to designate or change the identity or any information about the third party; vi) the Firm will keep records showing that the third party is not a related party of the Firm or located at the same address as the Firm; and vii) the custodian will send the client an initial and annual notice confirming the SLOA instructions.

## **Item 16. Investment Discretion**

Fiduciary Family Office is given the authority to exercise discretion on behalf of clients. Fiduciary Family Office is considered to exercise investment discretion over a client's account if it can effect and/or direct transactions in client accounts without first seeking their consent. Fiduciary Family Office is given this authority through a power-of-attorney included in the agreement between Fiduciary Family Office and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). Fiduciary Family Office takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold;
- When transactions are made; and
- The Independent Managers to be hired or fired.

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

Fiduciary Family Office does not accept the authority to vote a client's securities (i.e., proxies) on their behalf. Clients receive proxies directly from the Financial Institutions where their assets are custodied and may contact the Firm at the contact information on the cover of this brochure with questions about any such issuer solicitations.

**Item 18. Financial Information**

Fiduciary Family Office is not required to disclose any financial information listed in the instructions to Item 18 because:

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