

**ITEM. 1 COVER PAGE FOR  
PART 2A OF FORM ADV:  
FIRM BROCHURE  
March 24, 2026**

**GCI FINANCIAL GROUP, INC.**

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This brochure provides information about the qualifications and business practices of GCI Financial Group, Inc. If you have any questions about the contents of this brochure, please contact by telephone at 973-543-2133 or email at [michael.greco@gcifg.com](mailto:michael.greco@gcifg.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Authority.

Additional information about GCI Financial Group, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by CRD # 124193.

Please note that the use of the term "registered investment adviser" and description of GCI Financial Group, Inc. and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firms' associates which advise you for more information on the qualifications of our firm and its employees.

## **Item 2. Material Changes**

GCI Financial Group is required to make clients aware of information that has changed since the last annual update to the Firm Brochure (“Brochure”) and that may be important to them. Clients can then determine whether to review the brochure in its entirety or to contact us with questions about the changes.

Since our last annual amendment filing on February 28, 2025, we have the following material changes to report:

- Item 7: We generally require a minimum account size of \$300,000 to establish a relationship, this minimum may be waived at the Firm’s discretion.

### **Item 3. Table of Contents**

<u>Section:</u>	<u>Page(s):</u>
Item 4. Advisory Business.....	4
Item 5. Fees and Compensation.....	6
Item 6. Performance-Based Fees and Side-By-Side Management.....	7
Item 7. Types of Clients and Account Requirements.....	7
Item 8. Methods of Analysis, Investment Strategies and Risk of Loss.....	8
Item 9. Disciplinary Information.....	9
Item 10. Other Financial Industry Activities and Affiliations.....	10
Item 11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading...	10
Item 12. Brokerage Practices.....	11
Item 13. Review of Accounts or Financial Plans.....	14
Item 14. Client Referrals and Other Compensation.....	14
Item 15. Custody.....	15
Item 16. Investment Discretion.....	15
Item 17. Voting Client Securities.....	16
Item 18. Financial Information.....	16
Item 19. Requirements for State-Registered Advisers.....	16

#### **Item 4. Advisory Business**

We specialize in the following types of services: asset management and financial planning and consultations. Our assets under management are \$145,100,680 as of December 31, 2025.

We are dedicated to providing individuals and other types of clients with a wide array of investment advisory services. Our firm is a corporation formed in the State of New Jersey and is SEC registered. Our firm has been in business as an investment adviser since 2001 and is owned as follows:

Michael Francis Greco, President & Chief Compliance Officer - Fifty-percent owner

Matthew Wade Sherbine, Secretary – Fifty-percent owner

Description of the types of advisory services we offer:

##### **Asset Management:**

We emphasize continuous and regular account supervision and individualized investment advice to clients. As part of our asset management service, we generally create a portfolio, consisting of:

- individual stocks or bonds;
- exchange traded funds (“ETFs”);
- options, mutual funds and other public or private securities or investments.

The client’s individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned securities. Each portfolio will be initially designed to meet a particular investment goal, which we determine to be suitable to the client’s circumstances. Once the appropriate portfolio has been determined, we review the portfolio at least quarterly and if necessary, rebalance the portfolio based upon the client’s individual needs, stated goals and objectives. Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Client accounts may be managed on a discretionary or non-discretionary basis.

##### **Financial Planning and Consultations:**

We provide a variety of financial planning and consultation services to individuals, families and other clients regarding the management of their financial resources based upon an analysis of client’s current situation, goals, and objectives. Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation for clients based on the client’s financial goals and objectives.

This planning or consulting may encompass one or more of the following areas:

- |                                      |   |
|--------------------------------------|---|
| -Investment Planning;                | -Retirement Planning                      |
| -Estate Planning                     | -Charitable Planning                      |
| -Education Planning                  | -Real Estate Analysis                     |
| -Mortgage/Debt Analysis              | -Insurance Analysis                       |
| -Lines of Credit Evaluation          | -Business and Personal Financial Planning |
| -Corporate and Personal Tax Planning |   |

Our written financial plans or financial consultations rendered to clients usually include general recommendations for a course of activity or specific actions to be taken by the clients. It should also be noted that we refer clients to an accountant, attorney or other specialist, as necessary for non-advisory related services. Plans or consultations are typically completed within 2 months of the client signing a contract with us, assuming that all the information and documents we request from the client are provided to us promptly. Implementation of the recommendations will be at the discretion of the client.

Individual Tailoring of Advice to Clients:

Our firm offers individualized investment advice to our Asset Management clients. General investment advice will be offered to our Financial Planning & Consulting clients.

Ability of Clients to Impose Restrictions on Investing in Certain Securities or Types of Securities:

Each Asset Management client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account. Reasonable restrictions and limitations must be provided in writing and remain in effect until revoked by the Client in writing.

Participation in Wrap Fee Programs:

We do not offer wrap fee programs.

Amount of Client Assets We Manage:

We manage \$137,796,046 on a discretionary basis and \$7,304,634 on a non-discretionary basis as of December 31, 2025.

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

Description of how we are compensated for our advisory services provided to you.

### Asset Management:

<b>Assets Under Management</b>	<b>Annual Percentage of Assets Charge</b>
\$0 - \$500,000	2.00 %
\$500,001 - \$1,000,000	1.25 %
Over \$1,000,000	1.00 %

Our fees are negotiable, and we have the ability to reduce our fee schedule for clients on a case by case basis. We also have the ability to charge a fixed fee in lieu of a fee calculated as a percentage of assets under management for investment advisory services. Our fixed fees range from \$500 to \$2,500 depending on a number of factors and will be negotiable. In addition, we also have the ability to utilize a blended billing methodology which incorporates both a fixed fee and a fee determined as a percentage of assets under management for investment advisory services. All fees will be agreed to in advance, and disclosed within an Investment Advisory Agreement, for each client prior to the commencement of investment advisory services. In no circumstances will the total fee exceed 3% of the client's assets under management.

Our firms' fees are billed on a pro-rata annualized basis quarterly in advance based on the value of your account on the last business day of the previous quarter. In the event that you wish to terminate our services, we will refund the unearned portion of our advisory fee to you. You need to contact us in writing and state that you wish to terminate our services. Upon receipt of your letter of termination, we will proceed to close out your account and process a pro-rata refund of unearned advisory fees.

Fees will generally be deducted from your managed account\*. As part of this process, you understand and acknowledge the following:

- a) Clients must provide our firm with written authorization permitting direct payment of advisory fees from their account(s) maintained by a custodian who is independent of our firm; and
- b) The account custodian sends a statement to the client, at least quarterly, showing all account disbursements, including advisory fees.

\*In rare cases, we will agree to directly bill clients.

### Financial Planning and Consultations:

We charge on an hourly or flat fee basis for financial planning and consultation services. The total estimated fee that we charge you, is based on the scope and complexity of our engagement with you. Our hourly fees are \$250. Our flat fees range from \$500 to \$2,500. We require a deposit of fifty-percent (50%) of the ultimate financial planning or consultation fee with the remainder of the fee directly billed to you and due to us within thirty (30) days of your financial plan being delivered or consultation rendered to you. In all cases, we will not require a deposit exceeding \$1200 when services cannot be rendered within 6 (six) months.

Either party terminate the financial planning agreement upon thirty (30) days written notice to the other by certified or registered mail to the address set forth in the agreement. Unearned fees paid in cash will be refunded pro-rata based on the percentage of work completed up to the time of termination. All insurance commissions are outside the scope of the financial planning agreement and

will be considered earned. Non-payment of deposit by you, that is thirty (30) days past due, will also constitute termination of the agreement and the responsibilities of our firm to you.

Other types of fees or expenses *clients* may pay in connection with our advisory services, such as custodian fees or mutual fund expenses.

Our clients will incur transaction charges for trades executed in their accounts. These transaction fees are separate from our fees and will be disclosed by the firm trades are executed through. Also, clients will pay the following separately incurred expenses, of which we do not receive any part: internal charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses). Please see Item 12 of this Firm Brochure for information about our Brokerage Practices.

Description of our refund policy and how the amount is determined for the deposit fee for financial planning.

For our asset management services, we charge our advisory fees quarterly in advance. In the event that you wish to terminate our services, we will refund the unearned portion of our advisory fee to you. You need to contact us in writing and state that you wish to terminate our services. Upon receipt of your letter of termination, we will proceed to close out your account and process a pro-rata refund of unearned advisory fees based on the date of termination.

For financial planning and consultation services, we often charge a deposit of fifty-percent (50%) of the ultimate financial planning or consultation fee up front. All prepaid fees are fully refundable with the first five (5) days of agreement. Thereafter, fees will be refunded on a pro-rated basis based on the percentage of work already completed.

The fee for financial planning services is determined based upon the complexity of the case and the amount of time that advisor reasonably expects will be required to fully address the scope of the work requested by the client.

Commissionable securities sales.

We do not sell securities for a commission, and we are not registered with a broker-dealer.

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

We do not charge performance fees to our clients, and therefore do not engage in side-by-side management.

## **Item 7. Types of Clients and Account Requirements**

We have the following types of clients:

- Individuals;
- Trusts, Estates or Charitable Organizations;
- Pension and Profit Sharing Plans;
- Corporations, limited liability companies and/or other business types

Our requirements for opening and maintaining accounts or otherwise engaging us:

- We generally require a minimum account balance of \$300,000 in order to open an account for investment management services. This minimum may be waived, at the firm's discretion.
- We generally charge a minimum fee of \$500 for written financial plans. This minimum fee shall be negotiable.

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

Methods of Analysis:

- **Fundamental:** An examination of the underlying factors that affect the well being of economies, industries and/or companies. In regards to security analysis, fundamental analysis is a method of attempting to determine a security's intrinsic value by examining related economic, financial and other qualitative and quantitative factors - including both macroeconomic and company specific factors. Derived intrinsic value can then be compared to market value to evaluate the merits of investing in said security.  
Technical: A method of evaluating economies, industries and/or companies by examining statistics generated by market activity. In regards to security analysis, technical analysis involves the study of price and volume activity and sentiment indicators (such as put/call ratios, short interest, implied volatility, etc.) to identify trends.
- **Charting:** A technique of technical analysis. In regards to security analysis, charting is the study of a security's price chart to identify patterns and trends.
- **Cyclical:** A method of evaluating industries and/or companies based on the business cycle. In regards to security analysis, cyclical analysis involves the examination of the macroeconomic business cycle to determine those securities whose intrinsic value and/or price movement is expected to be affected by fluctuations in productivity or economic activity.

Risks Associated with Methods of Analysis:

There is no specific risk associated with one method of security analysis versus another. Independent of the method of analysis employed, the base risk is that the analysis will be inaccurate or flawed, or that the conclusions derived from said analysis will prove to be incorrect. There is no empirical data, or common standard, that one method of analysis carries a greater risk of inaccuracy. We believe that by simultaneously examining macroeconomic and security specific factors utilizing multiple methods of analysis reduces overall risk.

Investment Strategies we use:

- Long term purchases (securities held at least a year);
- Short term purchases (securities sold within a year);
- Trading (securities sold within 30 days);
- Option writing, including covered options, cash secured puts and puts to hedge;
- Inverse/Leveraged Exchange Traded Funds

### Risk of Loss:

Investing in securities involves risk of loss that *clients* should be prepared to bear. While the stock market may increase and your account(s) could enjoy a gain, it is also possible that the stock market may decrease and your account(s) could suffer a loss. It is important that you understand the risks associated with investing in the stock market, are appropriately diversified in your investments, and ask us any questions you may have.

There is inherently no difference in the risk associated with long term purchases, short term purchases or trading. The holding period is not indicative of the risk associated with the security. Different securities involve different risks – such as the risks of investing in equities versus the risks of investing in bonds – which is not necessarily impacted by the length of investment time horizon.

Option strategies can bring increased risks than traditional equity investing. Most commonly, however, we employ options as a hedging or income generation tool. In such circumstances (i.e. long put options as a hedge) the risk of loss is capped at the principal amount of the option purchase - much in the same manner as purchasing insurance. The use of covered call options, long put options and/or spreading strategies generally reduce overall portfolio risk.

A non-indexed ETF may trade above (premium) or below (discount) its Net Asset Value. A non-index ETF purchased at a premium may later be sold at a discount.

Inverse and/or Leveraged Exchange Traded Funds (ETFs) involve a higher degree of risk than traditional long only securities. Almost universally, these securities are designed to achieve their stated performance on a daily basis. These securities may not be successful in their performance objective. The compounding of daily performance is a risk that may cause the intermediate and long term performance of the security to differ greatly from the stated performance objective. Generally, these securities attempt to achieve their objective by investing in options, futures and employing margin (leverage). Derivative securities expose holders of these securities to additional risks such as correlation risk, credit risk and liquidity risk. Rolling of futures contracts presents Contango risk which may cause further deviation of anticipated performance and long term performance. These securities are only used for a select clients and held for a relatively short period of time.

### Additional information regarding our investment strategies:

In most cases, at least a partial cash balance will be maintained in a money market account so that our firm may debit advisory fees for our services related to comprehensive portfolio management, asset management service and portfolio monitoring, as applicable.

Short term trading can result in either, or both, higher tax consequences or expenses which can reduce overall returns.

## **Item 9. Disciplinary Information**

We have determined that there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

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

Representatives of our firm are licensed insurance agents. As a result of these transactions, they receive normal and customary commissions. A conflict of interest exists as these commissionable sales create an incentive to recommend products based on the compensation earned. To mitigate this conflict, our firm will act in the client's best interest. The Client always has the right to act on an insurance recommendation made by the firm or one of our advisors, and if the Client does decide to act, they always have the right to do so through any insurance agent of their choosing.

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

Brief description of our Code of Ethics adopted pursuant to SEC rule 204A-1 and offer to provide a copy of our Code of Ethics to any *client* or prospective *client* upon request.

We recognize that the personal investment transactions of members and employees of our firm demand the application of a high Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, we believe that if investment goals are similar for clients and for members and employees of our firm, it is logical and even desirable that there be common ownership of some securities.

Personal trading in the same securities that we may recommend to clients creates a conflict of interest. Therefore, in order to prevent conflicts of interest, we have in place a set of procedures (including a pre-clearing procedure) with respect to transactions effected by our members, officers and employees for their personal accounts<sup>1</sup>. In order to monitor compliance with our personal trading policy, we have a quarterly securities transaction reporting system for all of our associates.

Furthermore, our firm has established a Code of Ethics which applies to all of our associated persons. An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. We have a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

Neither our firm nor our firm's related person recommends to clients, or buys or sells for client accounts, securities in which our firm or a related person has a material financial interest (excluding an interest as a

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<sup>1</sup> For purposes of the policy, our associate's personal account generally includes any account (a) in the name of our associate, his/her spouse, his/her minor children or other dependents residing in the same household, (b) for which our associate is a trustee or executor, or (c) which our associate controls, including our client accounts which our associate controls and/or a member of his/her household has a direct or indirect beneficial interest in.

shareholder of an SEC-registered, open-end investment company). We therefore have no conflicts of interest to disclose in this regard.

Related persons of our firm may buy or sell securities and other investments that are also recommended to clients. In order to mitigate this conflict of interest, our related persons will in our clients' interests, ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request. If related persons' accounts are not included in a block trade, our related persons will always trade in such a way that does not front run or disadvantage trading for any client.

## **Item 12. Brokerage Practices**

### **Factors Used to Select Custodians and/or Broker/Dealers:**

GCI has a duty to select custodial brokers, dealers and other trading venues that provide best execution for clients. The duty of best execution requires an investment adviser to seek to execute securities transactions for clients in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances, taking into account all relevant factors. The lowest possible commission, while very important, is not the only consideration.

Generally, to achieve best execution, the Firm considers the following factors, without limitation, in selecting custodial broker-dealers and intermediaries:

- Execution capability;
- Availability of competing markets and liquidity;
- Trading characteristics of the security;
- Confidentiality;
- Reputation and integrity;
- Financial responsibility of the broker-dealer;
- Recordkeeping;
- Available technology;
- Ability to address current market conditions.
- Availability of accurate information comparing markets;
- Quality of research received from the broker dealer; and
- Responsiveness;

The Firm evaluates the custodial broker-dealers it uses at least annually.

Research and Other Soft-Dollar Benefits:

GCI has no formal soft dollars program in which soft dollars are used to pay for third party services. Our firm maintains a custodial relationship with Charles Schwab & Co., member FINRA/SIPC/NFA. Charles Schwab & Co. is an independent and unaffiliated SEC-registered broker-dealer. Charles Schwab & Co. offers to independent investment Advisors services which include custody of securities, trade execution, clearance and settlement of transactions. We receive some benefits from Charles Schwab & Co. through our participation in the program. We receive a benefit because we do not have to produce or pay for the research, products or services. Due to these benefits, we have an incentive to select or recommend Charles Schwab & Co. based on our interest in receiving the research or other products or services, rather than on our clients' interest in receiving the most favorable execution.

As part of the arrangements described above, Charles Schwab & Co. makes certain research and brokerage services available at no additional cost to our firm. These services include certain research and brokerage services, including research services obtained by Charles Schwab & Co. directly from independent research companies, as selected by our firm (within specific parameters). Research products and services provided to our firm may include research reports on recommendations or other information about, particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making; and other products or services that provide lawful and appropriate assistance by either custodian to our firm in the performance of our investment decision-making responsibilities. The aforementioned research and brokerage services are used by our firm to manage accounts for which we have investment discretion. Without this arrangement, our firm might be compelled to purchase the same or similar services at our own expense.

As a result of receiving the services discussed above, for no additional cost, we have an incentive to continue to use or expand the use of Charles Schwab & Co.'s services. Our firm examined this conflict of interest when we chose to enter into the relationship with Charles Schwab & Co. and we have determined that this relationship is in the best interest of our firm's clients and satisfies our client obligations, including our duty to seek best execution.

Charles Schwab & Co. charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). The custodian enable us to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Their commission rates are generally discounted from customary retail commission rates.; however, the commission and transaction fees charged by either Charles Schwab & Co. may be higher or lower than those charged by other custodians and broker-dealers.

Clients may pay a commission to Charles Schwab & Co. that is higher than another qualified broker dealer might charge to effect the same transaction where we determine in good faith that the commission is 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 broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates, to the benefit of all

clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions.

Directed Brokerage:

Neither we nor any of our firm's related person have discretionary authority in making the determination of the brokers with whom orders for the purchase or sale of securities are placed for execution. We do not have discretionary authority over the commission rates at which such securities transactions are effected. We typically require clients to use a specific custodial broker-dealer. Not all advisers require clients to use a particular custodial broker-dealer.

Brokerage for client referrals:

Our firm does not receive brokerage for client referrals.

**Special Considerations for ERISA Clients**

A retirement or ERISA plan client may direct all or part of portfolio transactions for its account through a specific broker or dealer in order to obtain goods or services on behalf of the plan. Such direction is permitted provided that the goods and services provided are reasonable expenses of the plan incurred in the ordinary course of its business for which it otherwise would be obligated and empowered to pay. ERISA prohibits directed brokerage arrangements when the goods or services purchased are not for the exclusive benefit of the plan. Consequently, we will request that plan sponsors who direct plan brokerage provide us with a letter documenting that this arrangement will be for the exclusive benefit of the plan.

Aggregation of orders (bunching), which may result in reduced transaction costs:

We may aggregate the purchase or sale of securities for various client accounts in quantities sufficient to obtain reduced transaction costs (known as bunching)

There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our firm, which involve accounts with similar investment objectives.

Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when we believe that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved.

In any given situation, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation.

### **Item 13. Review of Accounts or Financial Plans**

#### Frequency of review of account or financial plans:

We review accounts on at least a quarterly basis for our Asset Management clients. The nature of these reviews is to learn whether clients' accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable. The members of the investment committee will conduct these reviews. At least annually we will engage directly with Asset Management clients to review their accounts and to ascertain changes to their financial situation.

Financial planning clients do not receive reviews of their written plans unless they take action to schedule a financial consultation with us. We do not provide ongoing services to financial planning clients, but are willing to meet with such clients upon their request to discuss updates to their plans, changes in their circumstances, etc.

#### Factors that trigger more frequent reviews:

We may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc.

#### Content and frequency of regular reports provided to clients regarding their accounts:

We do not provide written reports to clients, unless asked to do so. Verbal reports to clients take place on at least an annual basis when we meet with Asset Management clients.

As mentioned in Item 13 of this Brochure, financial planning clients do not receive written or verbal updated reports regarding their financial plans unless they separately contract with us for a post-financial plan meeting or update to their initial written financial plan.

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

#### Additional Compensation and Arrangements:

Apart from the arrangements disclosed in Item 12 of this Brochure, we do not have any additional arrangements to disclose.

#### Direct or Indirect compensation of persons other than our firm's supervised persons for client referrals:

We do not pay referral fees (non-commission based) to independent solicitors (non-registered representatives) for the referral of their clients to our firm in accordance with relevant state statutes and rules.

## **Item 15. Custody**

We do not have physical custody over our client's accounts. Because we have "constructive" custody of client accounts due to our ability to deduct our fees from those accounts, we have adopted the following safeguarding procedures:

- (1) Our clients client must provide us with written authorization permitting direct payment to us of our advisory fees from their account(s) maintained by a custodian who is independent of our firm;
- (2) Your account custodian must agree to send you a statement, at least quarterly, showing all disbursements from your account, including advisory fees.

We encourage our clients to raise any questions with us about the custody, safety or security of their assets. The custodians we do business with will send you independent account statements listing your account balance(s), transaction history and any fee debits or other fees taken out of your account.

Additionally, we strongly encourage our clients to carefully review the statements that are received from the custodian.

In addition, certain clients have granted us limited authority to disburse funds to one or more third parties pursuant to a standing letter of authorization ("SLOA"). The SEC issued a no-action letter with respect to the Rule 206(4)-2 ("Custody Rule") under the Investment Advisers Act of 1940. The letter provided guidance on the Custody Rule as well as clarified that an adviser who has the power to disburse Client funds to a third party under a standing letter of instruction is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with our custodians:

- 1) The Client provides an instruction to the qualified custodian, in writing, that includes the Client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- 2) The Client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- 3) The Client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the Client's authorization, and provides a transfer of funds notice to the Client promptly after each transfer.
- 4) The Client has the ability to terminate or change the instruction to the Client's qualified custodian.
- 5) The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the Client's instruction.
- 6) The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- 7) The Client's qualified custodian sends the Client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

### **Item 16. Investment Discretion**

Our firm accepts discretionary authority for those clients who elect that service. If the clients elect to authorize discretionary management of their account(s), the client may place reasonable limitations on this authority in writing. In such cases, our clients need to sign a discretionary investment advisory agreement with our firm for the management of their account. This type of agreement only applies to our Asset Management clients. We do not take or exercise discretion with respect to our other clients and do not accept non-discretionary accounts.

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

We do not and will not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to our firm, we will forward them on to you and ask the party who sent them to mail them directly to you in the future. Clients may call, write or email us to discuss questions they may have about particular proxy vote or other solicitation.

### **Item 18. Financial Information**

Additional financial information about our firm:

- We do not require nor do we solicit prepayment of more than \$1200 in fees per client, six months or more in advance, therefore we have not included a balance sheet for our most recent fiscal year.
- We have not been subject of a bankruptcy petition at any time during the past ten years.
- There is no additional financial condition to disclose that may impair our ability to meet contractual commitments to our clients.