

Item 1 - Cover Page

Form ADV Part 2A

Firm Brochure

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This Brochure provides information about the qualifications and business practices of Axiom Advisory, LLC. If you have any questions about the contents of this Brochure, please contact us by phone at (800) 836-4792 or email at mike@axiomadvisory.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.

Axiom Advisory, LLC is an SEC- registered investment advisor. Registration of an investment advisor does not imply any level of skill or training. The oral and written communications of an advisor provide you with information about which you determine to hire or retain an advisor.

Additional information about Axiom Advisory, LLC is available on the SEC's website at www.Adviserinfo.sec.gov.

Item 2 - Material Changes

This Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

Since our last annual amendment filed January 28, 2021, we have the following material changes to disclose:

- Our firm address has changed to 750 B Street, Suite 1610, San Diego, CA, 92101.

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Item 4 – Advisory Business

Axiom Advisory, LLC (“Advisor”) is a fee-only registered investment adviser. Advisor specializes in providing holistic financial planning, financial consulting, and investment advisory services to individuals and families. Advisor is owned and operated by Michael P. Skolnick, CPA/PFS, who established his registered investment advisory business in 2010 as a sole proprietorship doing business as Axiom Advisory Services. In August 2014, the firm was reorganized as a limited liability company by the name of Axiom Advisory, LLC. Specifically, Axiom Advisory, LLC distinguishes itself from traditional investment advisory firms by providing services to meet your investment needs, as well as tax planning, estate planning, risk management, retirement planning, and business development needs. As of December 31, 2021, we manage \$204,543,673 on a discretionary basis and \$152,023 on a non-discretionary basis.

Advisor, as an SEC-Registered Investment Adviser, shall recommend appropriate investments and make trades of recommended securities in brokerage accounts for which the Client has provided Advisor with trading authority. Such trades shall only be made with the Client’s authorization on a discretionary basis.

Advisor does not sell insurance or investment products and does not accept commissions as a result of any product recommendations. Advisor does not pay referral or finder's fees, nor does it accept such fees from other firms.

Advisor provides the following three types of services:

1. Open Retainer:

An Open Retainer provides holistic/comprehensive investment management and financial planning for a fixed fee over the course of one year. Clients will have no limit of scheduled meetings during the Initial Year and Renewal Years (see below). The number of meetings will depend on their individual situation.

Services provided may include, but are not limited to: inventory of assets, analysis of financial goals, portfolio analysis, no-load mutual fund recommendations, portfolio implementation, development of an asset allocation strategy, rebalancing if necessary, tax preparation, tax planning, insurance review, retirement planning and estate plan reviews.

Initial Year of Open Retainer - Scheduled meeting topics are listed below. Advisor will schedule meetings to cover those topics relevant to you, such as:

- Goal and Budget
- Inventory of client assets
- Portfolio analysis
- Recommend investments
- Trade implementation
- Develop asset allocation strategies
- Tax preparation
- Tax planning
- Budgeting and cash flow
- Retirement planning
- Estate planning review

- Small business planning
- Insurance analysis
- Education planning
- Analysis of employee benefits

Renewal Years of Open Retainer - Typical scheduled meetings:

- Tax planning & Tax preparation
- Goal and Budget
- Investment review/update
- Rebalancing of assets
- Financial planning and/or any financial services as requested or needed by client.

2. Investment Management

As part of our Investment Management service clients will be provided asset management and financial planning or consulting services. This service is designed to assist clients in meeting their financial goals through the use of a financial plan or consultation. Our firm conducts client meetings to understand their current financial situation, existing resources, financial goals, and tolerance for risk. Based on what is learned, an investment approach is presented to the client, consisting of individual stocks, bonds, ETFs, options, mutual funds and other public and private securities or investments. Once the appropriate portfolio has been determined, portfolios are continuously and regularly monitored, and if necessary, rebalanced based upon the client's individual needs, stated goals and objectives. Upon client request, our firm provides a summary of observations and recommendations for the planning or consulting aspects of this service.

3. Online Investment Management Service:

We offer an online investment management service that produces portfolio recommendations, including asset allocations, purchase or sale of security recommendation in a particular asset class and ongoing rebalancing guidance. Our online program gathers information about the client's financial situation, goals, risk tolerance and investment preference. Client will then be required to link advisory account(s) for a portfolio analysis to determine a recommended asset allocation plan. To access the website, client will register online and link either their entire portfolio or choose specific advisory accounts ("Chosen Accounts") for which recommendations are to be produced.

4. Hourly Services:

If an Open Retainer relationship is not desired or practical, Hourly services are also offered. Hourly services are narrower in scope and usually focus on one or more of the following areas: goal setting, asset/liability analysis, tax planning, cash flow management, investment review, retirement planning, risk management, estate planning and record keeping. The service includes various client consultations as well as written and/or oral recommendations resulting from such consultations. The Hourly Service does not constitute a comprehensive financial planning engagement and follow-up advice and/or implementation assistance is not provided following the completion of the project. Additionally, tax return preparation is not automatically included with the Hourly Service, but may be purchased as a separate service, at the client's request, for an additional fee.

If a client wishes to upgrade to the Open Retainer option, they may receive credit toward Open Retainer fees for all amounts paid under Hourly Service agreement for the past six months.

Item 5 – Fees and Compensation

1. Open Retainer Billing Options:

Annual Open Retainer: \$3,500 to \$50,000. The actual fee charged will be outlined in the signed advisory agreement.

Add-ons, credits, and miscellaneous adjustments: A charge of \$750 is assessed for each amended tax return prepared, if applicable. A charge of up to \$1,500 per return is assessed for additional tax returns prepared for dependents of the client. Credits and miscellaneous adjustments may be applied if the client has an adequate estate plan (will or trust) in place, or for other reasons, as appropriate. Any credits or adjustments will be determined at the sole discretion of Advisor.

Axiom Advisory, LLC is a fee-only financial advisory firm and does not sell investment or insurance products. Clients are responsible, but under no obligation, to implement any recommendations made by Advisor. If specifically requested and authorized by Client (with such request accepted by Advisor), Advisor may, on a non-discretionary basis, execute recommendations on behalf of Clients for accounts and assets held at an outside custodian.

2. Investment Management Agreement:

Assets Under Management	Annual Percentage of Assets Charge
\$0 to \$500,000	1.0%
\$500,001 to \$1,000,000	0.8%
\$1,000,001 to \$5,000,000	0.6%
Over \$5,000,000	0.4%

Fees to be assessed will be outlined in the advisory agreement to be signed by the Client. Annualized fees are billed on a pro-rata basis quarterly in advance based on the value of the account(s) on the last day of the previous quarter. Fees are negotiable and will be deducted from client account(s). In rare cases, our firm will agree to directly invoice. As part of this process, Clients understand the following:

- The client's independent custodian sends statements at least quarterly showing the market values for each security included in the Assets and all account disbursements, including the amount of the advisory fees paid to our firm.
- Clients will provide authorization permitting our firm to be directly paid by these terms. Our firm will send an invoice directly to the custodian; and
- If our firm sends a copy of our invoice to the client, a legend urging the comparison of information provided in our statement with those from the qualified custodian will be included.

3. Online Investment Management Service:

The annual fee charged for this service is 0.50% of the Chosen Accounts' assets under management.

Our firm's annualized fees are billed on a pro-rata basis quarterly in arrears based on the average daily balance of the account on the last day of the previous quarter. Fees will be deducted from your managed account.

4. Hourly Services

Services under this arrangement are typically provided on an hourly basis. Advisor may negotiate an hourly fee of up to \$325 per hour for specific project requests. In Advisor's sole discretion, fees will be paid upon completion. Our firm will not require a retainer exceeding \$1,200 when services cannot be rendered within 6 months.

Additional Fees

In addition to Advisor's fee, clients may incur certain other fees and charges to implement Advisor's recommendations. Additional charges and fees will be imposed by custodians, brokers, third party investment and other third parties, such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to the Advisor's fee. These transaction fees are separate from our firm's advisory fees and will be disclosed by the chosen custodian. TD Ameritrade, Inc. TD Ameritrade and Charles Schwab & Co., Inc. do not charge transaction fees for U.S. listed equities and exchange traded funds. Clients may also pay holdings charges imposed by the chosen custodian for certain investments, charges imposed directly by a mutual fund, index fund, or exchange traded fund, which shall be disclosed in the fund's prospectus (e.g., fund management fees, distribution fees, surrender charges, variable annuity fees, IRA and qualified retirement plan fees, mark-ups and mark-downs, spreads paid to market makers, fees for trades executed away from custodian, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions). Our firm does not receive a portion of these fees.

Termination

The client may terminate an engagement by providing written notice within five days of signing an open retainer agreement or Investment Management agreement. Additionally, either party may terminate an agreement, without penalty, at any time upon 30 days written notice. Any prepaid but unearned fees will be promptly refunded by Advisor. Any fees that have been earned but not yet paid by Client will be due and payable. Whether fees have been earned or unearned will be determined by Advisor.

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

Advisor does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients & Account Requirements

Advisor provides holistic financial planning and investment advisory services primarily to individuals and families. We strive to work with people from all different walks of life. As discussed above, your chosen relationship agreement and fee will be based upon your individual circumstances.

Our firm requires a minimum account balance of \$50,000 for our Online Investment Management Service. Generally, this minimum account balance requirement is not negotiable and would be required throughout the course of the client's relationship with our firm. Our firm does not impose other requirements for opening and maintaining accounts or otherwise engaging us.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

The main sources of information Advisor may rely upon when researching and analyzing securities will include traditional research materials such as financial newspapers and magazines, annual reports, prospectuses, filings with the SEC, as well as research materials prepared by others, company press releases and corporate rating services. Advisor also subscribes to various professional publications deemed to be consistent and supportive of Advisor's investment philosophy.

Moreover, Advisor approaches investment portfolio analysis and implementation based on internal factors such as your tax situation, overall risk tolerance, current financial situation, and your personal goals and aspirations. After identifying these items, your portfolio will be structured around your individual needs, while minimizing negative effects of external factors, such as interest rates, market performance, and the economy as a whole.

In general, Advisor recommends no-load mutual funds (i.e., mutual funds that have no sales fees), exchange traded funds, U.S. government securities, money market accounts, certificates of deposit, and individual bonds (corporate, agency and municipal). However, in the course of providing investment advice, Advisor may address issues related to other types of assets that you may already own. Any other products that may be deemed appropriate for you will be discussed, based upon your goals, needs and objectives.

Any investing in securities involves risk of loss that clients should be prepared to bear. While Advisor will use its best judgment and good faith efforts in rendering services to client, not every investment decision or recommendation made by Advisor will be profitable. Advisor cannot warrant or guarantee any particular level of account performance, or that an Account will be profitable over time. Client assumes all market risk involved and understands that investment decisions are subject to various market, currency, economic, political and business risks.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Axiom Advisory, LLC or the integrity of Axiom Advisory, LLC's management. Advisor has no information to disclose applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Advisor is a member of the Alliance of Comprehensive Planners (ACP). This non-profit organization provides training and support through an alliance of fee-only comprehensive financial advisors. As a member of the ACP, Advisor has the right to use proprietary products and systems designed by the ACP. The ACP offers education in the form of in-person, web- and tele-conferences (which may provide continuing education credits) and services produced by collaborative efforts of the fee-only financial advisors.

Advisor is also a member of the National Association of Personal Financial Advisors (NAPFA), which requires that its members are fee-only and obtain a minimum of 60 continuing education credits every two years.

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

Axiom Advisory, LLC seeks to avoid material conflicts of interest. Accordingly, neither Advisor nor its investment adviser representatives nor its team members receive any third party direct monetary compensation (i.e., commissions, 12b-1 fees, or other fees) from brokerage firms (custodians) or mutual fund companies.

However, some additional services and non-direct monetary or other forms of compensation may be offered and provided to Advisor as a result of its relationships with custodian(s) and/or providers of mutual fund products. For example, Advisor's representatives and employees may be invited to attend educational conferences and/or entertainment events sponsored by such brokerage firms or custodians or mutual fund companies. Advisor believes that the services and benefits provided to it by brokerage firms (custodians) and mutual fund providers do not materially affect the investment management recommendations made to clients. However, in the interest of full disclosure of any potential conflicts of interest, we discuss the possible conflicts herein.

Although Advisor believes that its business methodologies, ethics rules, and adopted policies are appropriate to eliminate, or at least minimize, potential material conflicts of interest, and to appropriately manage any material conflicts of interest that may remain, clients should be aware that no set of rules can possibly anticipate or relieve all potential material conflicts of interest. In any event, Advisor will disclose to advisory Clients any material conflict of interest relating to Advisor, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

Our Code of Ethics

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. Our fiduciary duty is the underlying principle for our firm's Code of Ethics, which includes procedures for personal securities transaction and insider trading. Our firm requires all representatives 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 with our firm, and at least annually thereafter, all representatives of our firm will acknowledge receipt, understanding and compliance with our firm's Code of Ethics. Our firm and representatives 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. 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.

Participation or Interest in Client Transactions and Personal Trading

Advisor does not currently participate in securities in which it has a material financial interest. Advisor and its related persons, as a matter of policy, do not recommend to clients, or buy or sell for client accounts, securities in which the firm or its related persons has a material financial interest.

Advisor or individuals associated with Advisor may buy and sell some of the same securities for its own account that Advisor buys and sells for its Clients. When appropriate the Advisor will purchase or sell securities for Clients before purchasing or selling the same securities for Advisor's own account.

In some cases, Advisor may buy or sell securities for its own account for reasons not related to the strategies adopted by the Advisor's Clients. The Code of Ethics is designed to assure that the personal securities transactions will not interfere with making decisions in the best interest of advisory clients while at the same time, allowing employees to invest for their own accounts.

Certain classes of securities, such as open ended mutual funds, are designated as exempt transactions, meaning employees may trade these without prior permission because such trades would not materially interfere with the best interest of Advisor's clients. Nonetheless, because the Code of Ethics permits employees to invest in the same securities as clients, there is a possibility that employees might somehow benefit from the market activity of a client. Accordingly, when applicable, Employee trading is monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Advisor and its clients.

Advisor will disclose to advisory Clients any material conflict of interest relating to Advisor, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice. Advisor will notify Clients in advance of its policies in respect to officers trading for their own account including the potential conflict of interest that arises when recommending securities to Clients in which Advisor or its principal holds a position.

Item 12 – Brokerage Practices

Advisor participates in the TD Ameritrade Institutional program and MTG, LLC dba Betterment Securities ("Betterment Securities") collectively known as "TD Ameritrade and Betterment Securities". TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/SIPC/NFA. TD Ameritrade and Betterment Securities are an independent [and unaffiliated] SEC-registered broker-dealer. TD Ameritrade and Betterment Securities offers to independent investment Advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 below.)

Advisor may recommend a broker-dealer that we deem reliable. Client is not obligated to effect transactions through any broker-dealer recommended by Advisor. When recommending a broker-dealer the Advisor will comply with its fiduciary duty to obtain best execution and with the Securities Exchange Act of 1934, and will take into account such relevant factors as:

- Price;
- The broker-dealer's facilities, reliability and financial responsibility;
- The ability of the broker-dealer to effect transactions, particularly with regard to such aspects as timing, order size and execution of order;
- The research and related brokerage services provided by such broker or dealer to the Advisor, notwithstanding that the account may not be the direct or exclusive beneficiary of such services; and
- Any other factors the Advisor considers to be relevant.

Advisor does not receive any type of soft dollar benefits for broker dealer recommendations. TD Ameritrade and Betterment Securities may make certain research and brokerage services available at no additional cost to our firm all of which qualify for the safe harbor exemption defined in Section

28(e) of the Securities Exchange Act of 1934. These services may be directly from independent research companies, as selected by our firm (within specific parameters). Research products and services provided by TD Ameritrade and Betterment Securities 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 TD Ameritrade and Betterment Securities to our firm in the performance of our investment decision-making responsibilities.

We do not use client brokerage commissions to obtain research or other products or services. The aforementioned research and brokerage services are used by our firm to manage our advisory accounts. Without this arrangement, our firm might be compelled to purchase the same or similar services at our own expense.

As a result of receiving these services, we may have an incentive to continue to use or expand the use of TD Ameritrade and Betterment Securities services. Our firm examined this potential conflict of interest when we chose to enter into the relationship with TD Ameritrade and Betterment Securities and we have determined that the relationship is in the best interest of our firm's clients and satisfies our fiduciary obligations, including our duty to seek best execution.

TD Ameritrade and Betterment Securities charge brokerage commissions for effecting certain securities transactions (i.e., certain no-load mutual funds. TD Ameritrade and Betterment Securities enables us to obtain many no-load mutual funds without charges and other no-load funds at nominal charges. TD Ameritrade and Betterment Securities commission rates are generally discounted from customary retail commission rates. However, the commission rates charged by TD Ameritrade and Betterment Securities may be higher or lower than those charged by other custodians and broker-dealers.

Our clients may pay a commission to TD Ameritrade and Betterment Securities 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, 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.

Item 13 - Review of Accounts

Michael P Skolnick, CPA/PFS will review and assess financial recommendations on at least a quarterly basis. Factors triggering review may include significant changes in your financial condition, changes in the fundamentals of the companies or entities issuing securities, price fluctuations and significant economic or industry developments.

Item 14 - Client Referrals and Other Compensation

As disclosed under Item 12 above, Advisor participates in TD Ameritrade's institutional customer program and Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Advisor's participation in the program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Advisor but may not benefit its Client accounts. These products or services may assist Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

Our firm receives non-economic benefit from Betterment for Advisors and Betterment Securities in the form of the support products and services it makes available to our firm and other independent investment advisors whose clients maintain their accounts at Betterment Securities. These products and services, how they benefit our, and the related conflicts of interest are described above (see *Item 12: Brokerage Practices*). The availability of Betterment for Advisors' and Betterment Securities' products and services is not based on our firm giving particular investment advice, such as buying particular securities for our clients.

Axiom Advisory, LLC is a fee-only financial planning firm and does not sell insurance or investment products, nor does it accept commissions as a result of any product recommendations. Advisor does not pay referral or finder's fees, nor does it accept such fees from other firms.

Item 15 - Custody

While our firm does not maintain physical custody of client assets (which are maintained by a qualified custodian, as discussed above), we are deemed to have custody of certain client assets if given the authority to withdraw assets from client accounts, as further described below under "Third Party Money Movement." All our clients receive account statements directly from their qualified custodian(s) at least quarterly upon opening of an account. We urge our clients to carefully review these statements. Additionally, if our firm decides to send its own account statements to clients, such statements will include a legend that recommends the client compare the account statements received

from the qualified custodian with those received from our firm. Clients are encouraged to raise any questions with us about the custody, safety or security of their assets and our custodial recommendations.

Third Party Money Movement

On February 21, 2017, the SEC issued a no-action letter (“Letter”) with respect to Rule 206(4)-2 (“Custody Rule”) under the Investment Advisers Act of 1940 (“Advisers Act”). 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 authorization (“SLOA”) is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with our custodian:

- 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.
- 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.
- 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.
- The client has the ability to terminate or change the instruction to the client’s qualified custodian.
- 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.
- 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.
- 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

Clients have the option of providing our firm with investment discretion on their behalf, pursuant to an executed investment advisory client agreement. By granting investment discretion, our firm is authorized to execute securities transactions, determine which securities are bought and sold, and the total amount to be bought and sold. Limitations may be imposed by the client in the form of specific constraints on any of these areas of discretion with our firm’s written acknowledgement. In cases where Advisor does not have discretion, Advisor will not trade in client accounts without prior consultation with you.

Item 17 – Voting Client Securities

Our firm does 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, our firm will forward them to the appropriate client and ask the party who sent them to

mail them directly to the client in the future. Clients may call, write or email us to discuss questions they may have about particular proxy votes or other solicitations.

Item 18 – Financial Information

Our firm is not required to provide financial information in this Brochure because:

- Our firm does not require the prepayment of more than \$1,200 in fees when services cannot be rendered within 6 months.
- Our firm does not take custody of client funds or securities.
- Our firm does not have a financial condition or commitment that impairs our ability to meet contractual and fiduciary obligations to clients.
- Our firm has never been the subject of a bankruptcy proceeding.