

**Item 1: Cover Page****Form ADV Part 2A: Firm Brochure  
Northwest Financial Advisors LLC**

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This brochure provides information about the qualifications and business practices of Northwest Financial Advisors LLC ("NW Advisors"). You should review this Brochure in conjunction with our separate brochure supplement ("Supplement"). The Supplement(s) has been prepared for the purpose of providing information about the qualifications and background of the supervised person(s) working with you on our behalf or who may otherwise participate in the advisory services provided to you. Throughout this brochure the words "we", "us" and "our" refer to NW Advisors. For more information on the disclosure requirements required for Part 2A see the "General Instructions for Part 2 of Form ADV" by visiting [www.sec.gov/rules/final/2010/ia-3060.pdf](http://www.sec.gov/rules/final/2010/ia-3060.pdf). If you have any questions about the contents of this brochure, please contact our Chief Compliance Officer at 703-810-1072 or email [nsaunders@NWFLLC.com](mailto:nsaunders@NWFLLC.com). Additional information about us is also available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

We are registered as an investment adviser with the United States Securities and Exchange Commission (the "SEC") under the Investment Advisers Act of 1940 (the "Advisers Act"). Registration as an investment adviser with the SEC does not imply a certain level of skill or training. In addition, the information in this brochure has not been approved or verified by the SEC or by any state securities authority.

## Item 2: Material Changes

The Strategic Wealth Management Program (SWM) & Strategic Wealth Management Program II (SWM II) section of Item 4 has been updated to reflect the hiring of a Portfolio Analyst and the creation of models to be used within this platform.

In addition, on March 14, 2016, NW Advisors hired Nicole Saunders as the firm’s Chief Compliance Officer, splitting that role out into a separate, full-time position. Previously, Karen Benedict had held the Chief Compliance Officer role in addition to being the Senior Vice President and program manager for NW Advisors.

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## Item 4: Advisory Business

NW Advisors was established in 2013 and is wholly owned by NW Capital Management LLC which is a wholly owned subsidiary of Northwest Federal Credit Union. As of December 31, 2015 Assets Under Management, all of which are discretionary, totaled approximately \$789,000,000.

The focus of our business is helping clients plan and manage their investments. This typically involves working with our clients to arrive at a target allocation of their financial assets amongst different asset classes, and then implementing that allocation across any number of brokerage or other accounts. Clients are assigned to an investment adviser representative (“IAR”) and each IAR considers the client’s time horizon, risk tolerance, cash flow needs and other personal preferences when designing an investment portfolio. IARs design more conservative investment allocations for clients who are more risk adverse or more aggressive investment allocations for clients that desire a more growth-oriented portfolio. IARs analyze existing holdings and make recommendations for purchases and sales based on market conditions so as to maximize the probability of achieving the client’s goals and objectives while

minimizing risks and expenses. Clients may impose restrictions on investing in certain securities or types of securities within their portfolio.

We generally provide advisory services through certain programs sponsored by LPL Financial LLC (“LPL”), a registered investment adviser and broker-dealer. LPL is independently owned and operated and not affiliated with us or Northwest Federal Credit Union. LPL offers client both wrap-fee programs and non-wrap fee programs. A wrap fee program is an advisory program under which a specified fee not based directly upon transactions in a client's account is charged for the execution of client transactions and investment advisory services (which advisory services may include portfolio management or may include advice concerning the selection of other investment advisers). From a management perspective, there is not a fundamental difference in the way we manage wrap and non-wrap accounts. The only significant difference is the way in which transaction services are paid.

Below is a brief description of some of the LPL advisory programs available to us. The fees we charge for these programs are included in the overall fee charged by LPL. For more information regarding the LPL programs, including more information on the advisory services and fees that apply, the types of investments available in the programs and the potential conflicts of interest presented by the programs please see the LPL’s Form ADV Part 2, and the account application forms.

#### **Strategic Wealth Management Program (SWM) & Strategic Wealth Management Program II (SWM II)**

SWM and SWM II offer clients an asset management account that allows the IAR to direct and manage specified client assets. The SWM and SWM II programs also allow the client to select a third party investment advisor (Portfolio Manager), other than the IAR, to direct and manage specified client assets. The difference between SWM and SWM II is the type of fee charged. In the SWM program clients pay an asset based management fee and separate transaction costs. In the SWM II program, clients pay a single wrap fee for advisory services and execution of transactions.

NW Advisors employs a Portfolio Analyst who is responsible for the review, analysis and due diligence of various investment vehicles. The Portfolio Analyst presents information on these investment vehicles to the NW Advisors’ Investment Committee. The Investment Committee has created different models to be used by the IARs depending on the client’s investment objective. The Investment Committee meets monthly, or more frequently as needed, to review the models and determine what, if any, changes may be needed based on market conditions, performance, etc. The IARs can choose to use these models within the SWM and SWM II program; however, they still have the flexibility to deviate from the model to suit the individual client’s needs.

#### **Optimum Market Portfolios Program (OMP)**

OMP offers clients the ability to participate in a professionally managed asset allocation program using Optimum Funds Class I shares. Under OMP, client will authorize us on a discretionary basis to purchase and sell Optimum Funds pursuant to investment objectives chosen by the client. We will obtain the necessary financial data from the client, assist the client in determining the suitability of OMP and assist the client in setting an appropriate investment objective. We will have discretion to select a mutual fund asset allocation portfolio designed by LPL consistent with the client’s investment objective. We will have discretion to purchase and sell Optimum Funds pursuant to the portfolio selected for the client. We will also have authority to rebalance the account.

**Model Wealth Portfolios Program (MWP)**

MWP offers clients a professionally managed asset allocation program. We will obtain the necessary financial data from the client, assist the client in determining the suitability of the MWP program and assist the client in setting an appropriate investment objective. We will initiate the steps necessary to open an MWP account and have discretion to select a model portfolio of funds ("Portfolio") designed by LPL's Research Department or a third-party investment strategist ("Portfolio Strategist") consistent with the client's stated investment objective. The Portfolio Strategist is responsible for selecting the securities within a Portfolio and for making changes to the securities selected. The client will authorize us to act on a discretionary basis to purchase and sell securities in the account and to liquidate previously purchased securities. The client will also authorize us to effect rebalancing for MWP accounts. Securities may consist of mutual funds, ETFs, exchange-traded notes ("ETN") and closed-end funds.

**Other Account Programs**

We may recommend that certain of our clients allocate investment assets among various mutual fund asset allocation models, underlying mutual funds, and/or independent investment manager programs offered through other broker dealers or programs sponsored by LPL. Under such arrangements, clients authorize the use of such programs by completing account applications with the broker dealer. The IAR obtains the necessary financial data from the client, assists the client in determining the suitability of the advisory services and assists the client in setting the appropriate investment objective. The IAR provides ongoing investment advice and management that is tailored to the individual needs of the client based on the investment objective chosen by the client. Depending on the specific engagement, the types of securities that the IAR may purchase and sell include mutual funds, ETFs, equities, fixed income securities, and/or variable annuity subaccounts. Clients generally may impose reasonable restrictions on investing in certain securities or groups of securities. The assets managed as part of a customized engagement typically are held at the broker dealer selected by the client.

**Financial Planning**

We typically consult with our clients regarding a broad range of financial issues, such as taxes, insurance, estate planning, retirement planning, real estate purchases and charitable giving. For clients who require financial planning services, the IAR will collect financial and demographic information from the client. The IAR will prepare and present a financial plan, and will be available to help the client implement the recommendations. We may charge a fee for providing financial planning services that is based on the time required to prepare the plan. An estimate will be provided to the client before any services are rendered. The client shall pay us within 30 days from the date of our invoice or upon presentation of the written financial plan. We reserve the right to waive all or any portion of the financial planning fee with respect to any client.

**Item 5: Fees and Compensation****General**

We typically receive compensation from fees based on a percentage of assets under management. You should review all fees charged by us and others to fully understand the total amount of fees to be paid by you.

The account fee charged to the client for each LPL advisory program is negotiable, subject to the following maximum account fees:

Program	Maximum Fee
OMP	2.5%
MWP	2.5%
SWM & SWM II	2.5%
Other Programs including non-LPL sponsored programs	Negotiable

Fees are negotiated between the client and the IAR. Account fees are payable quarterly in advance. The first payment will be based on the opening market value of the account and will be pro-rated to cover the period from the date the account is opened through the end of that calendar quarter. Thereafter, the fee will be based on the account value on the last business day of the preceding calendar quarter. If client contributes funds to their account on a date other than the first day on a calendar quarter, then a prorated fee will be charged for that calendar quarter with respect to such contribution based on the number of days remaining in that calendar quarter. If a client withdraws assets on any date other than the last day of the calendar quarter then a prorated refund will be made based on the number of days left in the quarter prior to the withdrawal.

The fee structure is explained and agreed with the clients in advance before any services are rendered. Fees will generally be automatically deducted from your managed account. As part of this process, clients must understand and acknowledge the following:

- The custodian sends statements at least quarterly to the client showing all disbursements for their account, including the amount of the advisory fees paid to us;
- The client provides authorization permitting fees to be directly paid by the terms outlined in the advisory agreement; and
- The custodian calculates the advisory fees and deducts it from the client's account.

In the event a client wants to terminate our services, we will refund the unearned portion of our advisory fee. The client must provide notice of termination as outlined in the advisory agreement. Upon receipt of such notice, we will proceed to close out the client's account and process a pro-rata refund of unearned advisory fees.

Most of the programs used by us are referred to as wrap fee programs. Typically, a wrap fee program provides a bundle of investment services, including asset allocation, portfolio management, custody of client funds and securities, execution of client transactions, and monitoring of portfolio manager performance for a single "wrap" fee, generally a percentage of assets under management. The wrap fee client is not charged brokerage commissions on a transactional basis. On the other hand there are programs that do not charge a wrap fee. When evaluating a wrap fee arrangement, clients should consider whether a wrap fee or a non-wrap fee arrangement is more suitable. The fees may be higher under a wrap fee arrangement versus a non-wrap fee arrangement.

In addition to the program fees outlined above, you may also be subject to other fees including account maintenance fees, custodial fees, and transaction charges. A schedule of the fees charged will be provided with the account application. In addition to the program fees, clients may also incur the

management fees and any other expenses of any mutual funds or other investment vehicles that we select for a client's portfolio. Since these fees and expenses are typically deducted directly from the investment vehicle, they are not necessarily obvious to shareholders but they represent a real cost to our clients.

All of our IARs are licensed with LPL and can receive a commission for the sale of securities. However, we and our IARs will not accept commissions for the sale of securities when providing investment advisory services to advisory clients. For non-advisory accounts, our IARs will accept compensation for the sale of securities or other investment products, including distribution or service ("trail") fees from the sale of investment products offered by LPL. The receipt of compensation from the sale of securities or insurance products presents a conflict of interest since IARs have an incentive to effect securities transactions or recommend insurance products for the purpose of generating commissions rather than solely based on a client's needs. However, you are under no obligation, contractually or otherwise, to purchase securities or insurance products through our IARs.

### **Hourly Fees**

Financial planning services and advice are also offered based on a negotiable hourly fee ranging from \$150 to \$400. Clients are billed for hours of service provided and payments are due upon receipt of the invoice. Financial planning services can be terminated by either party upon written notification in accordance with the applicable contractual notice of termination. In the event this contract is terminated, the Client will be responsible for the fee that has been earned by us up to the date of termination. We will provide a billing statement to the client showing the time expended prior to termination, and that statement will be payable by client upon receipt.

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

Performance based fees are fees based on a share of capital gains on or capital appreciation of the assets of a client. An adviser charging performance fees to some accounts faces a variety of conflicts because the adviser can potentially receive greater fees from its accounts having a performance-based compensation structure than from those accounts it charges a fee unrelated to performance (e.g., an asset-based fee). As a result, the adviser may have an incentive to direct the best investment ideas to, or to allocate or sequence trades in favor of, the account that pays a performance fee. We do not charge any performance-based fees.

## **Item 7: Types of Clients**

We primarily provides customized investment supervisory services to individuals, trusts, estates, or charitable organizations, pension and profit sharing plans, and corporations or business entities. We do not impose a minimum account size to become an advisory client; however certain programs offered by LPL and other broker dealers may require a minimum amount of investable assets to open and maintain an account.

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

We use a long term investment philosophy and provide individual advice based on each client's risk tolerance. We review our client's long-term and short-term financial needs and objectives, and risk tolerance or risk-aversion. Investment recommendations are based on information provided to us by our

clients, financial records, responses to our questionnaires or personal interviews. We design each client's investment strategy based on a thorough evaluation of the individual goals and objectives of each client. After analyzing a client's financial situation and understanding their individual investment objectives, we will recommend investment programs sponsored by third party financial institutions including LPL. Following client approval, we will implement each aspect of the strategy, as appropriate. Account supervision is guided by the stated objectives of the client, and all managed accounts will be maintained with an independent custodian broker-dealer.

Our investment strategy involves recommending an asset allocation mix to our clients based on their individual needs by selecting an appropriate mix of mutual funds, exchange traded funds, equities, fixed income or Portfolio Managers to manage your assets. We monitor the asset allocation mix and performance of the investments, and make periodic adjustments to the account, as necessary to meet client objectives. In the event we recommend Portfolio Managers, we will monitor manager performance and various investment markets to determine if the allocation among investment options is appropriate or if changes to those options are necessary due to changes in the market or client's needs.

The description provided above is a brief overview of the investment category and is not intended to be complete. Investing in securities is inherently risky. An investment in individual securities or in a portfolio of securities could lose money. We cannot give any guarantee that we will achieve your investment objectives or that any client will receive a return of its investment.

The description below is an overview of the risks entailed in our investment strategy and is not intended to be complete. All investing involves a risk of loss and the investment strategy offered by us could lose money over short or long periods. Performance could be hurt by a number of different market risks including but not limited to:

**Stock Market Risk.** Stock market risk, which is the chance that stock prices overall will decline. An investment in individual securities or in a portfolio of securities could lose money. We cannot give any guarantee that we will achieve the client's investment objectives or that any client will receive a return of its investment. Stock markets tend to move in cycles, with periods of rising prices and periods of falling prices.

**Alternative Strategy Mutual Funds.** Certain mutual funds invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies and involves special risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund's concentration in the real estate industry.

**Exchange-Traded Funds (ETFs).** ETFs are typically investment companies that are legally classified as open end mutual funds or UITs. However, they differ from traditional mutual funds, in particular, in that ETF shares are listed on a securities exchange. Shares can be bought and sold throughout the trading day like shares of other publicly-traded companies. ETF shares may trade at a discount or premium to their net asset value. This difference between the bid price and the ask price is often referred to as the "spread." The spread varies over time based on the ETF's trading volume and market liquidity, and is generally lower if the ETF has a lot of trading volume and market liquidity and higher if the ETF has little trading volume and market liquidity. Although many ETFs are registered as an investment company under the

Investment Company Act of 1940 like traditional mutual funds, some ETFs, in particular those that invest in commodities, are not registered as an investment company.

Leveraged and Inverse ETFs, ETNs and Mutual Funds. Leveraged ETFs, ETNs and mutual funds, sometimes labeled “ultra” or “2x” for example, are designed to provide a multiple of the underlying index's return, typically on a daily basis. Inverse products are designed to provide the opposite of the return of the underlying index, typically on a daily basis. These products are different from and can be riskier than traditional ETFs, ETNs and mutual funds. Although these products are designed to provide returns that generally correspond to the underlying index, they may not be able to exactly replicate the performance of the index because of fund expenses and other factors. This is referred to as tracking error. Continual re-setting of returns within the product may add to the underlying costs and increase the tracking error. As a result, this may prevent these products from achieving their investment objective. In addition, compounding of the returns can produce a divergence from the underlying index over time, in particular for leveraged products. In highly volatile markets with large positive and negative swings, return distortions are magnified over time. Because of these distortions, these products should be actively monitored, as frequently as daily, and may not be appropriate as an intermediate or long-term holding. To accomplish their objectives, these products use a range of strategies, including swaps, futures contracts and other derivatives. These products may not be diversified and can be based on commodities or currencies. These products may have higher expense ratios and be less tax-efficient than more traditional ETFs, ETNs and mutual funds. LPL imposes limitations on accounts purchasing leveraged or inverse ETFs, ETNs, and mutual funds.

### **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 a client’s or investor’s evaluation of the adviser or the integrity of the adviser’s management. Neither we nor any of our officers, directors, or other management persons, have been involved in any legal or disciplinary events in the past 10 years that would require disclosure in response to this Item.

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

We are a separately capitalized company that is indirectly owned by Northwest Federal Credit Union (the “Credit Union”). We will have relationships and clients may utilize the services of certain entities affiliated with the Credit Union. The particular services involved will depend on the types of services offered by the affiliated company. Affiliated companies will be engaged on an arms-length basis for services it provides our client. Services provided by affiliated companies may include, without limitation, banking, tax advice, insurance advice, estate planning, retirement planning, real estate purchases, and other specialized advisory services.

#### Broker Dealer

Northwest Financial Group LLC (“NW Group”) is a member of the Financial Industry Regulatory Authority (FINRA). NW Group receives commission-based compensation from LPL for the sale of investment products. The compensation is earned by IARs in their capacity as a registered representative of LPL. If a client desires to purchase investment products offered by LPL through an IAR acting as a registered representative of LPL then LPL and NW Group will receive brokerage-related compensation for those services, such as commissions and/or trail fees. Information regarding the amount of brokerage

compensation will be provided to the client before the transaction is completed. Clients are advised that investment products provided through LPL are available from other financial institutions.

LPL Financial, LLC - LPL is a broker-dealer registered with FINRA and the SEC. As a broker-dealer, LPL transacts business in various types of securities, including mutual funds, stocks, bonds, commodities, options, private and public partnerships, variable annuities, REITs and other investment products. Our IARs are licensed as registered representatives of LPL, and will receive commissions for selling investment products to clients. A conflict of interest exists since an IAR has an incentive to recommend products that pay commissions. IARs do not receive commissions when providing investment advisory services through us.

#### Credit Union

Northwest Federal Credit Union offers traditional credit union services and products to its members, including checking and savings accounts and consumer loans. Employees of the Credit Union may refer banking customers who are in need of investment advisory services to us.

#### Insurance Company

NW Insurance Agency LLC (the "Insurance Agency") is a licensed insurance agency offering insurance products. IARs may be licensed as insurance agents of the Insurance Agency and receive commission when selling insurance products. The receipt of commissions on the sale of insurance products may create an incentive for the IAR. Whether or not to use the insurance services from or through our affiliated Insurance Agency is at the discretion of the client. To the extent that advisory clients use the insurance services from or through our IARs, commissions will be paid to them as an appropriately licensed agent. Clients are advised that similar insurance services are available elsewhere.

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

#### Code of Ethics

We have adopted a written Code of Ethics (the "Code") predicated on the principal that we owe a fiduciary duty to our clients. The Code establishes guidelines for professional conduct and personal trading procedures, including certain pre-clearance and reporting obligations.

We requires pre-clearance before purchasing an IPO or limited offering (i.e., private placement); requires periodic reporting of personal securities transactions and all holdings; and requires prompt internal reporting of Code violations to our Chief Compliance Officer. A copy of our Code is available upon request by contacting our Chief Compliance Officer at 703-810-1072.

Our employees may purchase, sell, or hold the same securities that our recommended to clients. Trades by employees are executed in a manner consistent with our fiduciary obligations to our clients. Employee trades must not be timed to precede orders placed for any client, nor should trading activity be so excessive as to conflict with the employee's ability to fulfill daily job responsibilities. All employees are required to sign a statement acknowledging their understanding of the rules, which are designed to prevent potential compliance-related concerns and mitigate potential conflicts, on an annual basis. The Chief Compliance Officer monitors employee trading, relative to client trading, to ensure that employees do not engage in improper transactions.

**Item 12: Brokerage Practices**

IARs providing investment advice on behalf of our firm recommends LPL for brokerage and custodial services. Our IARs are subject to applicable rules that restrict them from conducting securities transactions away from LPL unless LPL provides written authorization to do so. Therefore, these individuals are generally limited to conducting advisory and securities transactions through LPL. LPL has a wide range of approved securities products for which it performs due diligence prior to selection. IARs are required to adhere to these products when providing investment advice. It may be the case that LPL charges higher transactions costs and/or custodial fees than another broker charges for the same types of services. You may utilize the broker-dealer of your choice and have no obligation to purchase or sell securities through the broker our IARs recommend.

We do not currently maintain any formal soft dollar arrangements with LPL, however due to the relationship we have with LPL, we receive certain benefits to help us manage and administer client accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); the capability to execute, clear and settle trades; availability of investment research and tools that assist us in making investment decisions; capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.); and assists with back-office functions, record-keeping and client reporting.

Transactions for each client account generally will be effected independently. However, on occasion we will aggregate transactions for clients that we have discretionary trading authority. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple clients' accounts. Block trading may allow us to execute trades in a more timely and equitable manner.

**Item 13: Review of Accounts**

We review the performance of managed accounts on a continuous, ongoing basis. On a quarterly basis, we review the account's rebalancing activity, review the fees charged to the account, review trading in the account against any client-directed restrictions, and review the performance of the account. We meet with the client at least annually or more frequently to review any changes in their financial goals or profile which would require any changes in their asset allocation.

Clients receive account statements directly from the custodian on at least a quarterly basis.

**Item 14: Client Referrals and Other Compensation**

We do not compensate any person or company, for which is not controlled by or is under common control of NW Advisors, for client referrals nor do we offer or receive sales awards or prizes for providing investment advice to clients.

We do compensate the Credit Union for employees that refer banking customers that are in need of investment advisory services to us. For those referrals that meet certain qualifications such as the referral must:

- Be immediately and genuinely interested in a NW Advisors product or service;
- Need an full service advisor, not a self-directed product or service;

- Has the means to purchase a NW Advisors product or service; and
- Keep their scheduled meeting with the IAR.

Referrals cannot, under any circumstances, be qualified upon the result of a meeting or conversation. We are prohibited from qualifying Credit Union referrals based on whether or not an account was opened, the size of any resulting transaction, or the volume of assets gathered. For each referral that satisfies all of the above qualifications NW Advisors pays the Credit Union \$15.

### **Item 15: Custody**

Most client assets are held in custody by LPL, an unaffiliated broker/dealer, but we can access client funds through the ability to debit advisory fees. LPL send statements directly to the account owners on at least a quarterly basis. Some clients choose to hold their assets at other custodians. Clients should carefully review these statements, and should compare these statements to any account information provided by us.

### **Item 16: Investment Discretion**

We typically manage client accounts on a discretionary basis, subject to the restrictions (if any) that have been provided by clients. For accounts handled on a discretionary basis, we typically have the authority to determine the securities to be bought and sold without obtaining client consent to specific transactions; however the IAR will generally discuss investment recommendations prior to executing trades. Clients grant us trading discretion through the execution of a limited power of attorney included in the client's advisory contract.

### **Item 17: Voting Client Securities**

As a matter of policy, we disclaim any responsibility for voting client securities. Clients may contact us for advice or information about a particular proxy vote but we do not exercise proxy voting authority over client securities and should not be designated by custodians as the party to receive information on voting client proxies. The obligation to vote client proxies rests with the client.

### **Item 18: Financial Information**

We are not required to file a balance sheet since we do not collect more than \$1,200 in fees and six months or more in advance. In addition, there is no known financial condition that is reasonably likely to impair our ability to meet contractual commitments, and we have not been the subject of a bankruptcy proceeding.