

FORM ADV, PART 2A



Law & Associates, Inc.

6111 Tulane Avenue
Glen Echo, MD 20812

Phone #: (301) 229-8500

www.lawandassociates.com

March 2020

(Item 1)

This brochure provides information about the qualifications and business practices of Law & Associates, Inc. It is prepared pursuant to regulatory requirements. If you have any questions about the contents of this brochure, please contact the Firm at (301) 229-8500 or via the contact page of our website at <https://lawandassociates.com/contact-forms>. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities regulatory authority. Law & Associates, Inc. is a registered investment adviser with the Securities and Exchange Commission under the Investment Adviser's Act of 1940 (the "Advisers Act"). Such registration does not imply a certain level of skill or training. Additional information about Law & Associates, Inc. is available on our website, as noted above, and on the Securities and Exchange Commission's website at www.adviserinfo.sec.gov.

MATERIAL CHANGES (Item 2)

Law and Associates, Inc. is required to notify our clients of material changes we have made to Form ADV, Part 2A (the “Brochure”) since our last annual update, which was in March 2019. We have made the following material changes to the Brochure:

- Clarified our relationship with Raymond James Financial Services, Inc. (“RJFS”) by indicating that Law & Associates is an independent registered investment adviser that offers investment advisory services, and that its investment adviser representatives, in addition to being licensed to offer investment advisory services, are also licensed as registered representatives of RJFS to offer securities brokerage services.
- Clarified the fees that Law & Associates, charges for its asset management services for the fee-based account programs offered to clients.
- Clarified that the Firm offers wrap accounts through Raymond James & Associates, Inc., a registered broker-dealer.

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ADVISORY BUSINESS (Item 4)

Introduction

Law & Associates, Inc. (“Law”, the “Firm”, “we” or “our”) was founded in 1980 and registered with the Securities and Exchange Commission (the “SEC”) in 1982.

The oral and written communications we provide to the client, including this Brochure, contain information the client can use to evaluate Law and compare us to other advisers, to assist the client in making the decision to hire us or to continue to maintain a mutually beneficial relationship with us. This Brochure provides information about our qualifications and business practices.

Ownership

Law is a privately-owned corporation headquartered in Glen Echo, Maryland. Janice L. Henderson is the sole shareholder of the business.

Services Provided

For most of our client relationships, we provide Wealth Management Services, which includes Financial Planning Services, Investment Advisory Services, and Investment Management Services. A client may also hire us to provide only Financial Planning or only Investment Management Services as needed to address their particular needs.

Financial Planning Services

We will prepare an initial Comprehensive Financial Plan for the client, which will include the following services: (i) data collection, (ii) an initial case analysis, and (iii) an initial meeting with the client and, if requested, a follow-up meeting. Our Financial Planning Services will address the following areas, if applicable: cash flow planning, tax planning, education planning, distribution planning, risk management review, retirement plan strategies, estate planning (document review/strategy) and investment planning. After delivery of the initial Comprehensive Financial Plan, we will provide the client with periodic strategy sessions in person, by email or by telephone, as deemed necessary as mutually agreed upon, to review and implement the plan. These services shall be available at no additional charge until the first anniversary of the Client Agreement. After the first year, we provide Financial Planning Services, as needed, and periodically update the Comprehensive Financial Plan to adjust it for changes in the client’s financial situation or investment objectives.

Investment Management Services Programs

In addition to the Financial Planning Services we offer, the client can request that we implement the investment strategies, as recommended in the financial plan. The client investment strategies can be implemented through fee-based and/or non-fee-based programs provided through Raymond James

& Associates, Inc. (“RJA”), a member of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”).

Our investment recommendations are determined based on the client’s investment objectives, risk tolerance, net worth, net income, age, time horizon, tax situation and other factors. We determine the client’s investment allocation by utilizing an Investment Policy Questionnaire.

The client’s financial advisor receives a portion of the fee the client pays for the accounts listed immediately below. For further information on wrap fee accounts, refer to the RJA Wrap Program Brochure available at <https://adviserinfo.sec.gov>. The programs offered to clients are listed below.

Accounts Administered by Raymond James & Associates, Inc.

We exclusively utilize RJA as the broker-dealer for the execution of a client’s securities transactions. Factors we consider when recommending RJA include RJA’s financial strength, reputation, execution, pricing, research and service.

Ambassador

The Ambassador program is a wrap fee investment advisory account offered and administered by RJA. Law will manage the client’s account on a non-discretionary basis according to the client’s objectives. Ambassador offers the client the ability to pay an asset-based advisory fee, which includes transaction costs within the advisory fee in lieu of a commission for each investment transaction conducted in the account.

Accounts Administered by Third Party Managers

We may recommend the services of a Third-Party Investment Adviser (“TPA”) to manage the client’s portfolio through RJA. Any program we recommend that is offered through RJA will be consistent with the client’s financial needs, investment goals, and risk tolerance. Upon the client’s selection of a TPA, we will monitor the performance of the TPA to ensure its performance and investment approach remains aligned with the client’s investment goals. The TPA is granted discretionary authority by the client to manage and invest the client’s assets. If we recommend a TPA through RJA, the client will receive written disclosure of the TPA’s fees and costs prior to the client’s assets being placed with the TPA. Below is a list of the TPA programs offered:

Freedom

The Freedom Account is a wrap fee investment advisory account which allocates the client’s assets through discretionary mutual fund or exchange-traded fund (“ETF”) management, based upon the client’s financial objectives and risk tolerance. The client appoints Law as the client’s investment adviser to select the investment strategy and monitor performance on a continuing basis.

American Funds Model Portfolios Program

The American Funds Model Portfolios Program (“American Funds Program”) is a mutual fund advisory service that provides our clients the opportunity to allocate assets among various asset classes that cover a variety of investment objectives. The American Funds Program invests exclusively in American Funds mutual funds. The client appoints Law as the client’s

investment adviser to select the investment strategy and monitor performance on a continuing basis.

Raymond James Consulting Services Program (“RJCS”)

The client appoints Law as the client’s investment adviser to select certain portfolio managers, monitor performance of the client’s account and provide administrative services. Based upon the client’s financial needs and investment objectives, Law will assist the client in selecting an appropriate manager(s).

Eagle High Net Worth Program (“EHNW”)

The client appoints Eagle Asset Management as the client’s investment adviser. Eagle is a wholly owned subsidiary of Carillon Towers Advisers, Inc. (“CTA”), a wholly owned subsidiary of RJA. The client may select one or more investment objectives. Eagle will manage the client’s account on a discretionary basis in accordance with the client’s financial needs and investment objectives. Services provided to the client include assisting the client in choosing the appropriate Eagle objective, monitoring the client’s performance and administrative services.

RJA no longer offers the EHNW program to prospective clients, as the investment disciplines available in EHNW are generally also available through the RJCS program. However, existing EHNW accounts continue to be managed under the pre-existing investment agreement with Eagle Asset Management.

Raymond James Research Portfolios Program

The Raymond James Research Portfolios (“RJRP”) Program offers clients a managed account investment choice that leverages the research services of Raymond James’ Equity Capital Markets and Equity Portfolio & Technical Strategy Group divisions. The client appoints Law as the client’s investment adviser to select the investment strategy and monitor performance on a continuing basis.

Raymond James Multiple Discipline Account Program

The Raymond James Multiple Discipline Account (“MDA”) Program offers our clients access to certain investment strategies developed by Portfolio Managers participating in the MDA Program. The MDA Program is comprised of several strategies from the same manager and allows the manager to adjust allocations to strategies based on market conditions. Law will recommend the appropriate portfolio based on the client’s financial needs and investment objectives, and monitor performance on a continuing basis.

Freedom Unified Managed Account

The Freedom Unified Managed Account (“UMA”) Program is an investment advisory account which, like the Freedom Account, allows our clients to allocate assets through discretionary mutual fund or ETF management, based upon the client’s financial objectives and risk tolerance. Additionally, our client’s assets may be invested through affiliated or unaffiliated investment advisers (“Managers”) registered with the SEC with whom RJA has entered into a sub-advisory agreement. The client appoints Law as the client’s investment adviser to select the investment strategy and monitor performance on a continuing basis.

Outside Manager Program

The Outside Manager (“OSM”) Program provides investment advisory services to accounts managed by an unaffiliated investment adviser that is not available through the aforementioned RJCS programs. In the OSM Program, the client may receive discretionary investment advisory services from the OSM Manager, and trade execution, custodial, advisory and other services from RJA.

Wrap Fee Programs

As noted above, Law participates in wrap fee programs sponsored by RJA. Wrap accounts charge one fee, which includes investment management fees and any transaction fees.

Assets Under Management

As of December 31, 2019, the Firm has \$174,949,997.57 in total assets under management.

FEES AND COMPENSATION (Item 5)

Financial Planning Services Fees

The initial Financial Planning Services Fee is for delivery of the written plan, which includes recommendations and investment advice. Typically, the minimum initial year’s financial planning fee is \$2,500 and is payable by check. The firm has discretion to discount this fee depending on the client’s situation. It is our expectation to complete and deliver all plans within six months, assuming the client is timely in providing required information.

After the initial year, a flat fee is assessed for each Renewal Year for continuing Financial Planning Services and periodic review of the Comprehensive Financial Plan. This annual flat fee shall be agreed upon prior to or contemporaneous with the first anniversary of the Client Agreement. We may increase or decrease fees after providing the client at least 30 days’ written notice. Our fees may be higher than fees charged by other investment advisers, and our fees and method of calculating fees may vary from client to client.

The client is able to terminate the Financial Planning Services Agreement without penalty if the client delivers written notice to us within five (5) business days from the date of the acceptance of the Agreement. In the event this Agreement is terminated within six months of the Effective Date and we have not delivered the Comprehensive Financial Plan to the client, any fees collected in advance will be refunded to the client on a pro rata basis for the number of days remaining in such six-month period. In the event this Agreement is terminated after delivery of the Comprehensive Financial Plan but before the first anniversary of the Effective Date of the Agreement, the entire flat fee shall have been earned by Law and no refund will be due to the client.

Investment Management Services Fees

The maximum advisory fees for all accounts are listed below (except as otherwise indicated in this Brochure). Law has the discretion to discount fees.

Fee-Based Relationship Value of Assets under Management	Annual Rate
Up to \$1 million	2.25%
\$1 million up to \$2 million	2.00%
\$2 million up to \$5 million	1.75%
\$5 million up to \$10 million	1.50%
\$10 million and up	1.25%

The annual asset-based fee is paid quarterly in advance at the rate of $\frac{1}{4}$ of the annual rate. When an account is opened, the asset-based fee is billed for the remainder of the current billing period and is based on the initial contribution. Thereafter, the quarterly asset-based fee is based on the account asset value as reported by RJA, the Custodian, on the last business day of the previous calendar quarter, and becomes due the following business day. The client authorizes and directs RJA, as Custodian, to deduct asset-based fees from the client's account. The client further authorizes and directs RJA to send a quarterly statement to the client that reflects all amounts disbursed from the client's account for these fees. The brokerage statement will show the amount of the asset-based fee, the value of the assets on which the fee was based, and the specific amount of the fee that was deducted.

The client may also incur charges for other account services not directly related to the execution and clearing of transactions including, but not limited to, IRA custodial fees, safekeeping fees, and fees for legal or courtesy transfer of securities.

Ambassador

A minimum investment of \$25,000 is required for Ambassador Accounts, although a smaller account size may be accepted based upon the specific circumstances of an account.

Freedom

A minimum investment of \$25,000 is required for Freedom Accounts, although smaller account size may be accepted based upon the specific circumstances of an account.

Clients most appropriate for the mutual fund version of Freedom are those willing to pay more for the potential to outperform the market or benchmark indices over the long term, but must be aware of the potential for underperformance as well. Clients most appropriate for the ETF version of Freedom Accounts are those willing to achieve market-like returns, less management fees and operating expenses, with little potential for the individual ETFs to outperform the respective indices they track.

The investment decisions will be driven by Asset Management Services ("AMS") Manager Research and Due Diligence, and the mutual fund strategies can include "Highly Recommended"

funds from the Raymond James Mutual Fund Research (“MFR”) coverage list. If a fund is downgraded by MFR, RJA will determine the appropriate course of action, which may include replacing the downgraded fund in all Freedom Accounts, if necessary.

RJA is under no obligation to select funds exclusively from MFR’s “Highly Recommended” list. AMS Manager Research and Due Diligence continually monitors all funds in the Freedom Accounts, whether or not they are covered by MFR.

The Freedom Investment Management Client Agreement can be terminated by the client at any time upon providing verbal or written notice pursuant to the provisions of the Investment Management Agreement. There is no penalty for terminating an account. Upon termination, you will receive a refund of the portion of the prepaid asset-based fee which was not incurred based on the actual number of days in the quarter in which the account was managed.

Raymond James Consulting Services (RJCS) & Eagle High Net Worth (EHNW) Programs

The client is generally assessed an all-inclusive wrap fee, set forth as follows:

Fee-Based Relationship Value	Equity & Balanced Disciplines	Fixed Income Disciplines	Laddered Bonds & Short Term Conservative Fixed Income Disciplines*
Up to \$1 million	2.75%	2.55%	2.45%
\$1 million up to \$2 million	2.50%	2.30%	2.20%
\$2 million up to \$5 million	2.25%	2.05%	1.95%
\$5 million up to \$10 million	2.00%	1.80%	1.70%
\$10 million and up	1.75%	1.55%	1.45%

For RJCS and EHNW accounts, there generally is a minimum investment requirement of \$100,000 for equity and balanced accounts, and \$200,000 for most fixed income accounts. Certain Managers may require a higher minimum investment. Minimum investments for each Manager’s discipline participating in the RJCS and EHNW programs are available in the Investment Management Client Agreement.

A client may terminate the management agreement according to the terms disclosed in the management agreement. If fees are paid by the client prior to services being rendered, and the client terminates services, the prorated fees for the portion not used will be returned to the client, as determined by the actual number of days the account was managed. Fees may be discounted at the discretion of the adviser.

Freedom Unified Managed (UMA) and Multiple Discipline Account (MDA) Programs

The client is generally assessed an all-inclusive wrap fee, set forth as follows:

Fee-Based Relationship Value	All Strategies (Except Institutional)	Institutional Strategies
Up to \$1 million	2.60%	2.50%
\$1 million up to \$2 million	2.35%	2.25%

\$2 million up to \$5 million	2.10%	2.00%
\$5 million up to \$10 million	1.85%	1.75%
\$10 million and up	1.60%	1.50%

For Freedom UMA and MDA accounts, there generally is a minimum investment requirement of \$300,000. A client may terminate the management agreement according to the terms disclosed in the management agreement. If fees are paid prior to services being rendered, and the client terminates services, the prorated fees for the portion not used will be returned to the client, as determined by the actual number of days the account was managed. Fees may be discounted at the discretion of the Manager.

Outside Manager (“OSM”) Program

This program generally requires a minimum investment of \$100,000 for all equity and balanced accounts, and \$200,000 for most fixed income accounts, although certain OSM Managers may require higher minimums.

RJA’s Asset-Based Fee does not include any fees paid to the OSM Manager. The client will compensate the OSM Manager separately as agreed upon between the client and the OSM Manager. The OSM Manager is typically responsible for calculating and collecting the management fee. However, for simplicity of billing administration, certain OSM Managers may request that

RJA calculates and assesses the OSM management fee as part of RJA’s wrap fee. Otherwise, for those OSM Managers that do not delegate billing administration to RJA, RJA will debit the OSM Manager’s fee to the client’s account upon receipt of the client’s authorization, however RJA will not be responsible for verification of the computation of such fee.

Additional Expenses not included in the Asset-Based Advisory Fee:

Clients may also incur charges for other account services provided by RJA that are not directly related to the advisory, execution and clearing services provided including, but not limited to, IRA custodial fees, safekeeping fees, charges/interest for maintenance of margin and/or short positions, and fees for legal or courtesy transfers of securities. For a complete list of account service charges, the client may contact his/her financial advisor or visit RJA’s website: “Client Account Fees and Charges” at www.raymondjames.com/services_and_charges.

Both the Freedom and Ambassador account types offer asset allocation investment portfolios utilizing ETFs or mutual funds. The client should be aware that ETFs and mutual funds have unique distinguishing characteristics and their cost structures differ, sometimes significantly. Because mutual funds are typically actively managed, the underlying management fees and operating expenses assessed by the fund companies are generally higher than those for ETFs (typically 1% to 1.5% for mutual funds versus 0.20% to 0.30% for ETFs). These fees are assessed by the mutual fund company or ETF and are in addition to Law’s Investment Management Services fee.

For a list of fund companies that have agreed to participate in RJA’s current Education and Marketing Support program, please visit: www.raymondjames.com/legal-disclosures/packaged-product-disclosures/mutual-fund-investing-at-raymond-james/mutual-fund-revenue-sharing.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT (Item 6)

Performance-based fee arrangements involve the payment of fees based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. We do not charge performance-based fees.

TYPES OF CLIENTS (Item 7)

Law serves a wide range of clients which include, but are not limited to individuals, high net worth individuals, trusts, estates and various business entities. We have long-term relationships with many of our clients.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS (Item 8)

The Firm's investment process is driven by a financial planning process with an emphasis on diversification and elements of modern portfolio theory. Our asset allocation is driven by a comprehensive client consulting process. This is a multiple step process driven by the client's needs and objectives. Our investment strategies focus on the diversification of a client's portfolio. We do not recommend a single strategy or security for achieving a client's long-term objectives.

DISCIPLINARY INFORMATION (Item 9)

We do not have any facts to disclose about legal or disciplinary events that would be material to a client's evaluation of the integrity of our firm or its Advisory Agents.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS (Item 10)

We have an arrangement with RJA in which RJA, a registered broker-dealer, will act as the qualified custodian for a client's securities and funds. Advisory Agents of our firm are also registered representatives of RJFS, an affiliate of RJA, and therefore any securities transactions conducted in the capacity of registered representative will generate customary commissions and loads on mutual funds.

Advisory Agents of the Firm are also licensed insurance agents for various other companies. If the client elects to implement the plan or buy insurance through the Firm's Advisory Agents, the Advisory Agent or Law will receive a commission from insurance sales (including variable products), which includes life, disability and fixed annuities. This presents a conflict of interest in instances

where the Advisory Agent recommends that a client purchase an insurance product, which results in a commission being paid. We have no exclusive agreement with any insurance agency, company or broker, and will evaluate the appropriate products of any insurance agency, company or broker that offers products suitable for the client's needs.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING (Item 11)

Code of Ethics

We have adopted a Code of Ethics Policy to prohibit conflicts of interest from personal trading by our personnel and have established standards of conduct expected of our personnel. We have set forth in the Code of Ethics Policy general principals, required course of conduct, prohibition on use

of inside information, reporting obligations, and review and enforcement of the Code of Ethics Policy. We will provide a copy of the Code of Ethics to the client upon written request.

Participation or Interest in Client Transactions/Personal Trading

We typically do not purchase individual securities for our clients. However, associated persons of our Firm may buy or sell individual securities for themselves. If a recommendation is made to a client to buy or sell the same security that an associated person intends to buy or sell, the associated person may only trade for their personal account after we have placed the trade for our client.

The client will receive statements from RJA, our broker dealer, at least quarterly. Additionally, account balances and statements are available at RJA's at <https://www.raymondjames.com>.

BROKERAGE PRACTICES (Item 12)

Brokerage Selection

A client's assets must be maintained in an account at a "qualified custodian", generally a broker-dealer or bank. We exclusively utilize RJA, as the broker-dealer for the execution of a client's securities transactions. Not all investment advisers require the use of a particular broker-dealer. Using RJA exclusively creates a potential conflict of interest with our clients since our personnel are registered representatives of RJFS and generate commissions on trades enacted through RJA. Factors which we consider when recommending RJA include RJA's financial strength, reputation, execution, pricing, research and service.

Research and Other Soft Dollar Benefits

The Firm does not have any formal soft-dollar arrangements. However, we and/or our Advisory Agents receive some economic benefit from RJA, the broker dealer we recommend, including professional seminars and conferences. At the conclusion of each year, certain qualifying advisers are awarded membership in RJA's recognition councils. Qualification for recognition councils is based upon a combination of the adviser's annual production (both advisory and transactional), total client assets under administration and any professional

certifications acquired through educational programs.

Directed Brokerage

Our Advisory Agents are also registered representatives of RJFS, a registered broker dealer with FINRA, and will recommend RJFS to advisory clients for brokerage services, if appropriate. Registered representatives are subject to FINRA Conduct Rule 3280, which restricts them from conducting securities transactions away from RJFS. Therefore, clients are advised that our Advisory Agents are limited to conducting securities transactions through RJFS. A client should understand that not all investment advisers require the exclusive use of one broker-dealer.

Brokerage for Client Referrals

Neither our Firm nor our Advisory Agents receive client referrals from any broker-dealer or other third party.

REVIEW OF ACCOUNTS (Item 13)

We review and update our clients' financial plan and/or investment accounts and request a meeting with each client periodically, with the goal of doing so annually.

Statements, confirmations and/or performance reports are provided monthly to clients from the RJA, the custodian of the client's assets. The monthly account statements from RJA indicate activity, previous portfolio balances, current portfolio balances, and account summary. A client should thoroughly review the account statements for accuracy and contact Law or RJFS immediately upon discovering any discrepancies. Additionally, a client's asset balances are available through RJA's website at <https://www.raymondjames.com>.

CLIENT REFERRALS AND OTHER COMPENSATION (Item 14)

Client Referrals

We do not have any arrangements to compensate, or receive compensation from, any person or entity for client referrals.

As previously noted, some of our personnel may qualify for annual travel benefits as a result of their annual production (both advisory and transactional), total clients' assets under administration, and any professional certifications acquired through educational programs.

Other Compensation

Our Advisory Agents are registered representatives of RJFS. In this capacity, they can sell securities through RJFS, with these transactions generating normal and customary commissions. This presents a conflict of interest in instances where a recommendation is made to a client to

invest in a security that generates a commission.

Additionally, if a client elects to implement the recommendations in a financial plan and those recommendations include the purchase of insurance (life, disability, long-term care, or variable or fixed annuities), then Law or its Advisory Agents would receive a commission from the insurance sale. This presents a conflict of interest in view of the fact that the Firm or our Advisory Agent will receive a commission based on the recommendation to the client. The commission received for the recommendation to purchase insurance is in addition to the fees assessed to the client for Investment Management Services, Financial Planning Services, and other services that may be provided.

CUSTODY (Item 15)

A client's funds and securities will be maintained with a "qualified custodian" as required under Rule 206(4)-2 of the Advisers Act (the "Custody Rule"). The Custody Rule is designed to provide additional safeguards for investors against possible theft or misappropriation of investor's assets by an SEC-registered investment adviser.

The custodian sends account statements to the client at least quarterly. The client should carefully review the account statements promptly when received for any errors or discrepancies.

Law does not maintain physical custody of the client assets that it manages. Physical custody of a client's accounts (securities and funds), as well as trading and clearing of securities transactions, will be the responsibility of Raymond James & Associates, Inc., a qualified designated custodian and clearing firm, and member of the New York Stock Exchange and SIPC.

INVESTMENT DISCRETION (Item 16)

The Firm does not have discretionary authority over any client accounts.

VOTING CLIENT SECURITIES (Item 17)

We do not vote client proxies and will instruct the custodian to forward all proxy material directly to the client.

FINANCIAL INFORMATION (Item 18)

We do not require the prepayment by a client of more than \$1,200 in fees six or more months in advance. Therefore, we are not required by securities laws, rules or regulations to include a financial statement with this Brochure.

Confidentiality

Protecting clients' privacy is extremely important to us. We view it as a top priority. Pursuant to the requirements of the Gramm-Leach-Bliley Act, we have instituted policies and procedures to ensure that client information is kept private and secure. We do not disclose any non-public personal information about clients or former clients to any non-affiliated third parties, except as permitted by law. In the course of servicing a client account, we may share some information with service providers, such as, but not limited to, transfer agents, custodians, broker/dealers, accountants, and lawyers.

We restrict internal access to non-public personal information about clients to those employees who need to know that information in order to provide products or services to the client. We maintain physical and procedural safeguards that comply with federal standards to guard a client's non-public personal information and ensure its integrity and confidentiality. As emphasized above, it has always been and will always be our policy to never sell to anyone any information about current or former clients or their accounts. It is also our policy not to share information unless required to process a transaction, at the request of our client, or as required by law.

A copy of our privacy policy will be provided to each client prior to, or contemporaneously with, the execution of the Client Agreement. Thereafter, we will deliver a copy of the current privacy policy to clients prior to any change in our sharing practices.