



June 10, 2020

## INTRODUCTION

We are registered with the Securities and Exchange Commission as an Investment Adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

## What investment services and advice can you provide me?

- We offer investment advisory and financial planning services to retail investors. We do not provide brokerage services. Investment advisory services include wealth management, financial planning, and investment management. We monitor our clients' investments on a regular basis (at least quarterly) as part of our standard services. See Item 13 of our MCA Form ADV 2A, available [here](#). Our agreements with our clients give us broad discretionary authority over their accounts, which means we can choose the types of investments, the [allocations](#) among different [categories of investments](#), the timing of investment decisions and trading strategies. Our discretion is limited in three important ways, however: First, it can only be exercised in a manner that is consistent with agreed-upon investment objectives. Second, investments may only be purchased, sold or transferred in your name. Third, proceeds from sales must be disbursed only to you, not to us. For additional information see our MCA Form ADV Part 2A brochure, available [here](#).

- We offer more limited investment advisory services through our "GPS Program". For GPS Program services we charge a lower fee but, (although these are technically accounts over which we have discretion) clients are primarily responsible for selecting their investment [allocations](#) and for most account review and monitoring. For additional information please see our MCA GPS Program Form ADV Part 2A brochure, available [here](#).

- Alternatively, we offer clients financial planning services that do not include investment management services. These involve us designing a financial plan for you that you (not we) will decide whether and how to implement. We do not have discretion under these arrangements, nor do we monitor or review your accounts.

- You should ask a financial professional these questions:
  - "Given my financial situation should I choose an investment advisory service? Why or why not?"
  - "How will you choose investments to recommend to me?"
  - "What is your relevant experience, including your licenses, education and other qualifications? What do those qualifications mean?"

## What fees will I pay?

- Our investment management fees are generally calculated by applying an agreed-upon annualized percentage to the value of the assets in your account. The more assets that are in your account the more you will pay in fees. Fees are paid [quarterly in arrears](#). Generally these fees are paid by having your account custodian deduct the fees from your account. See Item 5 of our MCA Form ADV 2A, available [here](#).

- In addition to paying us you will also pay fees and expenses to others. These include mutual fund or exchange traded fund operating expenses, brokerage commissions, regulatory fees, transaction fees, and other related costs and expenses. See Item 4.C. of our MCA Form ADV 2A, available [here](#).

- Financial planning fees are a set, negotiated, amount that is based on the nature and extent of the services being provided. These fees are not based on the value of assets in your account. These fees are typically paid annually. See Item 5 of our MCA Form ADV 2A, available [here](#).

- Neither we nor any of our employees are compensated by third parties for the sale of investment products or securities.

- You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying, and ask your advisor questions if you do not.

- You should ask a financial professional these questions:
  - *“Help me understand how these fees and costs might affect my investments.”*
  - *“If I give you \$10,000 to invest, how much will go to fees and costs and how much will be invested for me?”*

### What are your legal obligations to me when acting as my investment adviser? How else does your firm make money, and what conflicts of interest do you have?

- We are a fiduciary, which means that *when we act as your investment adviser*, we have to act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means:

- The more assets that are in your account the more you will pay in fees, which means that we may have an incentive to encourage you to increase the assets in your account.
- We choose the broker-dealers and custodians for retail client accounts over which we have discretion. We receive certain benefits (generally research, operational and regulatory compliance related resources) from broker-dealers and custodians we select for your account. While this may technically create a conflict of interest, we do not have any so-called *“soft dollar”* arrangements or receive any monetary benefits from broker-dealers. See Item 12.A. of our MCA Form ADV 2A, available [here](#).
- Ask your financial professional *“How might your conflicts of interest affect me, and how will you address them?”*
- For additional information please reference Items 10-12 of our form MCA ADV Part 2A, available [here](#).

### How do your financial professionals make money?

- Our financial professionals are paid through a combination of salary and discretionary compensation. Compensation is based on experience, the amount of client assets they service, the time and complexity required to meet a client’s needs and revenue the firm earns from the advisory services they provide. This last component may technically constitute a conflict of interest in the sense that it encourages them to have you increase the assets in your account. However, any compensation paid to our financial professionals will not increase the fees you pay us.

### Do you or financial professionals have a legal or disciplinary history?

- No, we do not. Visit [investor.gov/CRS](http://investor.gov/CRS) for a free and simple tool to research us and our financial professionals.
- Ask your financial professional *“As a financial professional do you have any disciplinary history? If so, for what type of conduct?”*

### ADDITIONAL INFORMATION

- For additional information about our services please refer to our Form ADV Part I and 2A, available [here](#). If you would like additional, up-to-date information or a copy of our disclosures please call 616-454-9600.
- Ask your financial professional *“Who is my primary contact person? Is he or she a representative of an investment adviser or broker-dealer? Who can I talk to if I have concerns about how this person is treating me?”*