



Travis Nordgren, RICP®, AIF®

Sterling Financial Group, LLC

4525 South Wasatch Boulevard, Suite 250,
Salt Lake City, UT 84124
801.269.6714



ABOUT OUR FIRM

Introduction to Sterling Financial Group

Sterling Financial Group is a recognized leader in providing sophisticated financial and estate planning services to affluent individuals who may or may not already have some planning and advisors in place. Our consultants specialize in providing integrated, personalized solutions to help our clients develop and implement complex estate, business, retirement and investment strategies. Although many of our clients have trusted, long-term advisors—attorneys, CPAs and others – our work supplements and coordinates the services these advisors provide. What sets us apart is that we look at all areas of our client’s financial affairs and pull them together in a cross-disciplinary manner to effectively help them meet their financial security and asset preservation objectives.

As an independent financial services firm, we have the freedom to provide diverse guidance and insight into the myriad of variables involved in a sound financial plan. The degree of detail and sophistication of the financial planning services provided varies according to the individual client’s circumstances. Our primary product is our sound guidance, solutions and relationship with you, our client; financial products and services are secondary.

Our Mission

It is our mission to be a leader in financial services by creating personal financial solutions, adding value to and showing our clients how to experience financial success. To be held to the highest ethical standards, to be a wealth strategies firm which always exceeds the expectations of our clients and is constantly refining its processes to create greater efficiency and results.

Our Code of Values

- Our clients are not dependent on us; we are dependent on them.
- Our clients honor us by giving us an opportunity to earn their business.
- Our clients are not to be argued with; “The customer is always right.”
- Our clients’ privacy is paramount. We will hold in strictest confidence, and consider as privileged, all business and personal information pertaining to our clients’ affairs.

Our Customer Service Policy

- To provide the optimal level of service and guidance to our clients, we request that our clients be forthcoming with all relevant financial information.
- If you are displeased with any element of our service, we request that you contact us by phone or email so that we may address any issues that arise.
- If you are unable to keep an appointment, we request that you notify us a minimum of 24 hours in advance.
- If you are pleased with the service and the results you are receiving, we would be honored to receive introductions to friends, family members, or business colleagues whom you believe would appreciate the same level of service you have received from us.



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SERVICES PROVIDED

Personal Financial Planning

Our client-focused process is tailored to help individuals set financial goals, develop a financial road map, and implement the appropriate financial tools and strategies.

Supported by:

- Investment management products (e.g., stocks, bonds, mutual funds)
- Insurance planning and products (e.g., term, universal, and variable life; health; long-term care; and disability insurance)
- Asset allocation services
- Educational programs
- Tax-sensitive planning
- Estate planning coordination services

Business Financial Planning

We take a personalized approach with business owners, developing objectives, strategies, and tactics to pursue long-term financial results.

Supported by:

- Employee group benefits
- Executive compensation planning
- Retirement plan services
- Buy-sell agreement analysis and funding
- Business succession planning
- Estate planning for closely held businesses
- Strategic planning

Multigenerational Financial Planning

Designed to support the accumulation, conservation, utilization, and transfer of family wealth, these services are geared toward higher-net-worth clients—executives, professionals, or business owners.

Supported by:

- Sophisticated asset allocation strategies and wealth transfer techniques
- Business succession consulting and planning
- Advanced income and estate tax advising
- Charitable giving tools and techniques
- Financial education programs for the next generation



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WHERE DO WE ADD VALUE?

With so many professionals, corporations, and even websites offering investment advice, it's easy to get confused by the array of services, products, and plans. Prospective clients often ask us, "Where do you add value? What distinguishes you from the pack?" What follows is a brief response designed to assure you that partnering with our firm could be among the wisest decisions you ever make.

There are literally hundreds of thousands of people in the field of financial services who act as investment advisors, managing a client's portfolio for a fee or earning commissions on trades. But we believe we're different because we can offer sound investment guidance while providing something more—comprehensive wealth management.

Our approach to planning is carefully designed for our clients. Our planning services are as unique and diverse as the clients we serve. Because there is no cookie-cutter solution when it comes to managing our clients' financial futures, we stock our shelves with fine financial ingredients and cook up customized solutions for each individual. The cooking analogy aside, we partner with our clients to help make their goals—of preserving their wealth, preparing for tomorrow, and putting it all together—a reality.



Accumulation of assets is just one of several areas that we focus on. We also provide expertise in retirement planning, estate planning, risk management, taxation, business planning, and asset allocation. This commitment to a life planning approach makes financial planning personal and addresses specific individual needs.

We employ a dynamic educational process that allows clients to visualize their personal goals and model the financial consequences of their choices. We rely on sophisticated software to plan and illustrate our strategies. We have partnerships with CPAs, attorneys, and other professionals dedicated to working as a team to meet all aspects of our clients' needs.

Most important—what separates our firm from the others—are the relationships we develop with our clients. We built our firm based on the fundamental elements of mutual trust, honesty, and respect, which helps us better strive to help make your goals a reality.



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VALUE OF WORKING WITH AN AIF® DESIGNEE

Overview

Simply put, the term *fiduciary* applies to the more than five million individuals who have the legal responsibility for managing someone else's money. A fiduciary is required by law to always act in the best interests of his or her client, beneficiary, or retirement plan participant. Yet, many fiduciaries are not even aware of their duties and responsibilities.

Accredited Investment Fiduciary® (AIF®) designees have been provided with the tools and training to help them acquire a thorough knowledge of fiduciary responsibility and can be an invaluable resource to investment fiduciaries and individual investors alike.

Don't risk going it alone; AIF designees have the expertise to help ensure that an investment management process is managed to an appropriate fiduciary standard of care.

Training

AIF designees have successfully completed a specialized program on investment fiduciary standards of care at the Center for Fiduciary Studies. The Center, in association with the University of Pittsburgh Joseph M. Katz Graduate School of Business, was established in 1999 to provide the investment industry with the first full-time training and research facility focused exclusively on investment fiduciary responsibility and portfolio management.

Designees have passed a comprehensive examination on the 27 Prudent Investment Practices that formed the basis of their training. Designees are also required to strictly adhere to continuing professional education requirements, which aids them in staying abreast of recent events in the industry that are affecting every fiduciary.

Prudent investment process

The 27 practices that designees follow have been derived from interpretations of legislation, case law, and regulatory opinion letters that govern the fiduciary. *Prudent Investment Practices*, the published handbook that describes these practices, was co-produced by the Center and the American Institute of Certified Public Accountants (AICPA). Each of the 27 practices also makes good investment sense, and using the process they define should help to improve long-term investment performance.

More information

For more information on the AIF designation, please contact Travis Nordgren at 801.269.6714.



INTRODUCTION TO COMMONWEALTH

Just as you're free to choose the advisor you believe is best suited to help you meet your objectives, our firm benefits from the same freedom in selecting a firm to help us serve you. The partner we chose to help us help you pursue your goals is Commonwealth Financial Network,[®] the largest privately held Registered Investment Adviser-independent broker/dealer in the country, with more than \$200 billion in total assets* and approximately 2,000 affiliated advisors.*

As a 100-percent management-owned firm, Commonwealth is not beholden to shareholders, stock prices, or a parent company. The firm can focus on a much longer time horizon than a public firm can and is free to invest in the kind of infrastructure, scale, and support that helps us maintain our own independent status—and allows us to focus exclusively on what benefits you most.

The client-centric values we share with Commonwealth, coupled with the firm's continually expanding resources, mean we're all working toward the same goal: to provide you with the exceptional guidance, products, and service you want and deserve. This includes:

- **Investment choice.** Commonwealth offers us robust, independent market research and a wide universe of third-party investment options—from individual stocks and bonds to mutual funds, exchange-traded funds, alternative investments, managed accounts, and retirement plans. Our access to Commonwealth's expert, impartial guidance and a diverse range of products helps ensure that we remain free to operate in your best interest and to make recommendations based on your financial objectives, personal investment style, and risk tolerance—without pressure to promote proprietary products or strategies.
- **Responsive service.** Commonwealth's business model centers on delivering indispensable service at every level of the organization—so that we, in turn, can do the same for you. The firm's 2.1:1 advisor-to-staff ratio* is one of the best in the industry, which means that Commonwealth staff members stand ready to respond to our needs promptly and execute transactions quickly and efficiently.

- **Integrated technology.** Commonwealth's technology platform gives us a truly comprehensive view of your complete financial life, all in one place. This enables us to efficiently and easily review your financial situation, make updates and changes, and keep you apprised of your status through user-friendly web-based systems. A client portal allows you to see much of the same information we see online.
- **Breadth of expertise.** Commonwealth's team includes more than 45 staff with CFA,[®] CFP,[®] ChFC,[®] and JD credentials, as well as niche-qualified specialists with experience spanning estate planning, taxation, risk management, business planning, and retirement planning. So however complex your needs, we can tap into the capabilities of some of the most knowledgeable people in the industry to provide solutions that align with your goals.
- **Access to top management.** Commonwealth delivers the scale and breadth of resources that are typically available at bigger, publicly held firms—but with more personal service. The firm's uncommon approach gives us regular access to its 14 managing partners, who have an average tenure of 24 years. Access to this depth of knowledge translates into better, faster, more informed decisions for you.
- **Business consulting.** Commonwealth offers us complimentary in-house support to help us optimize our efficiency and ensure that our business model enables us to most effectively respond to your needs.
- **Compliance support.** We also benefit from legal and regulatory guidance to help us ensure that your investments—and our firm's business practices—are in compliance with the industry's myriad rules and regulations.

These are just a few of the ways the firm goes above and beyond what most broker/dealers do, and why we feel so strongly about our partnership with Commonwealth.

*As of December 31, 2019

Commonwealth is a member of the SIPC, which protects securities customers of its membership up to \$500,000 (including \$250,000 for claims for cash). An explanatory brochure is available on request or at www.sipc.org.



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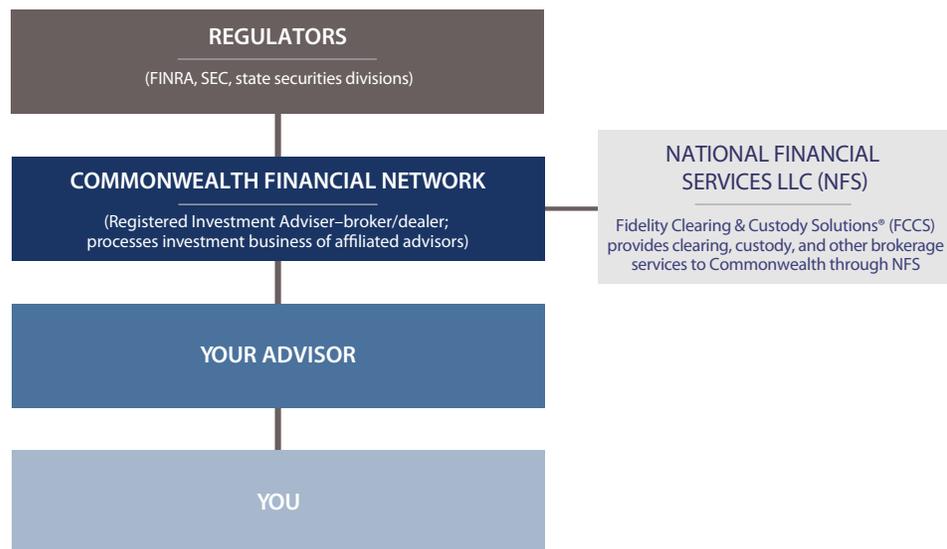
INDEPENDENCE MEANS GREATER FREEDOM FOR ALL

In the highly regulated securities industry, multiple federal and state entities provide oversight of the work financial advisors do on behalf of investors. The types of services an advisor provides carry a corresponding requirement to affiliate with an appropriate firm or entity to ensure compliance with the rules governing those services. But we have many choices of whom to affiliate with and which business model we want to follow. The fact that we've chosen to work with Commonwealth Financial Network,[®] a Registered Investment Adviser–broker/dealer, provides some key advantages to you:

- Our firm remains free to act in your best interest and to help you follow the best course of action to meet your financial goals. We can make recommendations to you without any pressure to promote proprietary products or strategies. It's a

model that differs from that of some other types of financial firms whose advisors are accountable not just to their clients, but also to the parent company that employs them.

- Because Commonwealth is independently owned and managed, the firm is able to allocate resources toward whatever is in the best interests of its financial advisors and their clients, not shareholders.
- Fidelity Clearing & Custody Solutions[®] (FCCS)¹ provides clearing, custody, and other brokerage services to Commonwealth through National Financial Services LLC (NFS). Like Commonwealth, NFS is an industry leader with a long and stable history of customer service excellence. We have the utmost confidence in the proficiency with which NFS handles every trade, statement, report, and myriad other transactions for millions of clients—and we believe that you can as well.



¹Fidelity Clearing & Custody Solutions[®] (FCCS) is an independent company, unaffiliated with Commonwealth. FCCS is a service provider to Commonwealth and provides clearing, custody, and other brokerage services to Commonwealth through National Financial Services LLC (NFS), member NYSE, SIPC. 812041.1.0



WEALTH MANAGEMENT

As you strive to grow your personal net worth, the financial challenges you face become increasingly complex. While some investors have a long-term strategy in place to grow their assets and manage risk within their portfolios, many do not have strategies for dealing with the tax implications that result from the distribution and transfer of the assets they have worked so hard to accumulate.

Capitalizing on opportunities to preserve, grow, and transfer your wealth requires the sophisticated guidance of a professional who knows and understands your long-term financial goals.

As an Investment Adviser Representative of Commonwealth Financial Network®, I have the ability to offer wealth management services that address the complex financial planning issues that many of my clients face. Commonwealth's Wealth Management program provides me with the infrastructure to offer you a comprehensive array of services to help plan and manage your wealth.

For the phases of your financial life

Wealth management refers to the coordination of various strategies that encompass all phases of your financial life, from the accumulation of assets, to risk management, to tax strategies, to retirement and estate planning.

The easiest way to conceptualize wealth management is to think of it as the logical transitions of your financial life:

- **The accumulation of wealth.** Construction of a solid, financial base sufficient to pursue your financial objectives.
- **The protection of wealth.** Creation of a strategy aimed at preserving your assets from erosion due to unexpected expenses, inflation, market decline, and taxes.



- **The tax-advantaged distribution of wealth during life.** Development of a sophisticated tax management plan to enhance your asset base by minimizing your tax burden and allowing you to distribute your assets according to your wishes.
- **The tax-advantaged distribution of wealth at death.** Planning for the controlled distribution of your assets at death—to whom you want, when you want, and at the lowest possible cost.

Strategies for complex issues

Wealth management planning seeks answers to those tough economic questions and decisions that come with modern living. Commonwealth's Wealth Management program divides these issues into six modules—each focusing on a different area of your financial life:

- **Accumulation** addresses your individual needs, asset allocation, and the suitability of different types of securities in light of your goals and risk tolerance. Accumulation strategies help to ensure that your investment portfolio remains closely aligned with your overall financial goals as you continue to build your asset base.
- **Risk management** works to minimize financial and other losses potentially associated with risks to your assets, business, or health. Some examples of risk are personal and professional liability, business ownership, property loss, and catastrophic illness or disability. Your first line of defense is to identify your sources of risk and then to either avoid or minimize the major exposures.



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- **Taxation** considers the tax implications of individual, investment, or business decisions, usually with the goal of minimizing tax liability. While decisions are rarely made solely on their tax impact, you should have a working knowledge of the income or estate tax issues and costs involved.
- **Business planning** focuses on issues specific to business owners and shareholders. For most business owners, the business is their most significant asset, and the financial success of that business has an immediate impact on the economic security of the family. Without proper planning, you may have difficulty tapping the value of your business to support your retirement, or your family may lose the value of the business at your death.
- **Retirement planning** involves evaluating your current financial status and creating an accumulation strategy that will help to ensure your desired retirement lifestyle. Because your retirement years can span decades, retirement planning generally dominates other financial goals. A successful plan put into place during the wealth-building life span should address ways to maximize growth and tax-efficient distributions, as well as how to leave retirement assets to the next generation.
- **Estate planning** creates a master plan for the management of your property during life and the distribution of that property at death. For most people, estate planning gives you more control over your assets during your lifetime, provides care when you are disabled, and allows for the efficient, low-cost transfer of wealth at your death.

While not all of these modules will apply to your situation, we believe that identifying and addressing those that are pertinent will help you to better manage your financial future.

Planning for the long term

No matter what your level of wealth, working closely with a trusted professional who knows and understands you can help you target your goals. Working together, we can help you simplify the complexities of your financial life by focusing on your wealth in a systematic way and implementing a plan that will benefit you for the long term.

Commonwealth Financial Network® does not provide legal or tax advice. You should consult a legal or tax professional regarding your individual situation.

DEFINING THE WEALTH MANAGEMENT PROCESS

Intelligent investors often ask, “What is your wealth management process?” When it comes to managing our clients’ assets, we adhere to a proven system.

Below is an overview of our six-step process.

- **Establish Client and Financial Consultant Relationships**

The goal here is to get to know you. We will ask you for relevant financial data, assess your risk tolerance, and determine your financial goals and needs. All future decisions in the Wealth Management process will stem from this information.

- **Gather Data**

We will identify your principal needs and work with you to prioritize both short- and long-term goals.

- **Analyze Current Positions**

In an “observations meeting,” we will assess your current accounts and policies, looking closely for gaps or inconsistencies.

- **Present an Action Plan**

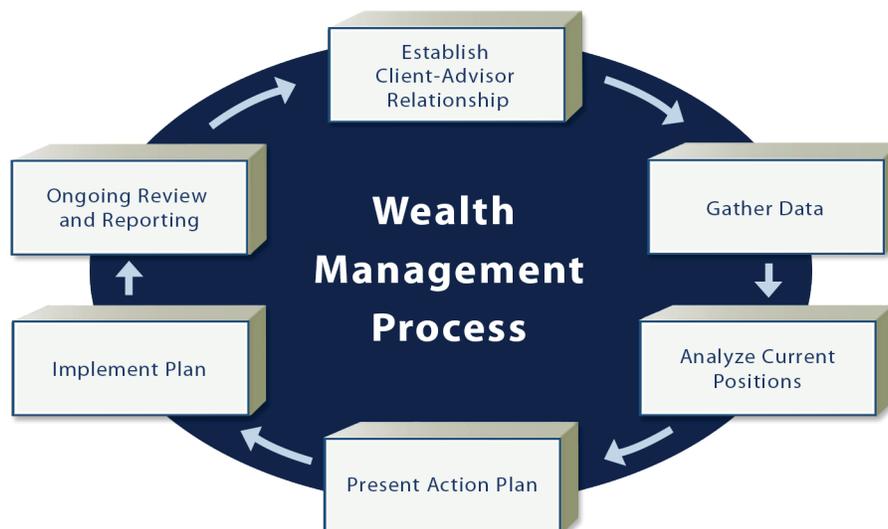
Depending on your situation, we will draft a financial plan that may include an Investment Policy Statement, a thorough retirement income plan, or a detailed action plan.

- **Implement the Plan**

At this stage, we will make the investment decisions on a product level: Which mutual funds should you buy? Which insurance policy is best for you? What sort of annuity fits best with your situation?

- **Ongoing Review and Reporting**

The final step in the Wealth Management process involves the ongoing monitoring of your portfolio. As time goes on, we will ensure that your assets remain diversified and that your objectives stay on track. Diversification does not assure a profit or protect against a loss in declining markets.



THE IMPORTANCE OF PRIORITIZING GOALS AND OBJECTIVES

We often move through our lives like racehorses on a track, blinders on and hurrying ahead. We fall into routines, busy ourselves with work and loved ones, and tend to avoid looking at the “big picture” in all but the most dramatic moments.

A wealth manager looks at the big picture, and we pride ourselves on our ongoing process. In our practice, we make a distinction between tactical and strategic decisions. Tactical decisions are made in a moment to address current circumstances; strategic decisions are made with the present in sight and the future in mind.

Without the guidance of a financial professional, most people make tactical decisions. They invest their year-end bonus in the hottest stock or a nicer car. **We will add a strategic lens to your decisions.** We might look at your total financial picture and realize that you should probably be investing in long-term care, or that you would really benefit from putting money aside for retirement—not that shiny, new car.

The basis of strategic thinking is planning. And planning is what we do best. Many people come to our office expecting a focus on product selection—what fund is best for them, which annuity should they buy, what life insurance policy has the cheapest riders—but we are not selling any particular investment vehicle. **We are selling premier service. We are selling strategic thinking. We are selling a well-thought-out plan.** Our product selection is carefully made, but it is always secondary to the plan. Our practice is stronger because of our big-picture approach.

A financial plan revolves around an investor, zeroes in on personal financial circumstances, and aims at resolving complexities. It is never cookie-cutter. Its value lies in its intimate relationship to the investor. We cannot develop a plan without really understanding you. **It is essential that you communicate your financial goals and needs.** We will help you identify your needs, and we will listen closely as you tell us your goals.

As an independent wealth consultant, we are under no obligation—or influence—to sell any particular product. You can be assured that any product we ultimately select, and any services we recommend, are chosen in your best interest.

Before we select products and build a plan, we must establish your short- and long-term financial goals and needs. Our role is to help you prioritize these aims so that we can help protect, preserve, and transfer your wealth in accordance with your priorities.

Our job is to help you pursue your goals for today and tomorrow. We know that as time moves on, your financial goals and objectives will change. You can be assured that our financial plan for you will evolve simultaneously.



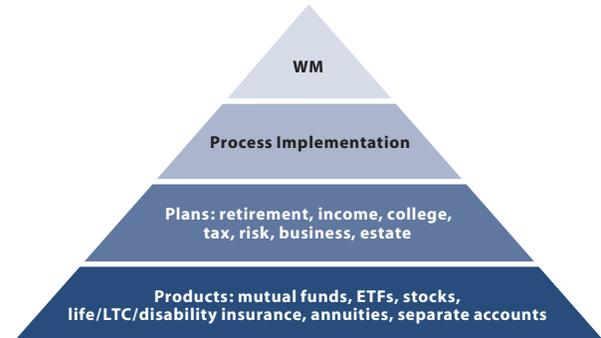
THE ROLE OF THE WEALTH MANAGER

Independence is at the core of wealth management. Our process-driven strategy is designed to provide solutions to all of your financial needs.

As investment products have become increasingly complex and investor needs have expanded, clients have turned to financial professionals rather than relying on brokers. Individuals who used to pay for products and get guidance for free now pay for guidance while still getting best-of-class products. Because we believe that the trend toward guidance conforms to our client-first philosophy, we offer ourselves to you as wealth consultants.

Wealth management is about replacing products with process—a strategy that provides total professional services. Instead of picking the hottest stocks, we rely on a strict investment methodology to help ensure that our clients' portfolios are aligned with their best interests. We don't try to sell a particular life insurance policy, but we do assess your personal goals and needs before considering what sort of insurance might be appropriate. Rather than turning you away when you ask us to develop a college plan, we will help you understand the nuances of 529 plans and other college savings vehicles.

The Wealth Management Pyramid



Our services range from coordinating an estate plan to managing risk, from income distribution planning to business succession planning. We partner with accountants and attorneys to provide solutions to all of your financial needs.

As independent advisors, we have no obligation to sell a particular product, so we suggest the best-suited one instead. Knowing that there is no one-size-fits-all solution to personal finance, we strive to find the proper solutions for you.

We seek to provide invaluable financial guidance to high-net-worth individuals with complex planning needs. Our focus is to help you achieve your goals. Our strategy is wealth management.



OUR RESPONSIBILITIES AS YOUR ADVISOR

As you know, our job is to help you achieve your financial objectives. But you may not be familiar with the steps that go into pursuing your goals and needs.

Despite what do-it-yourself financial planning websites and TV commercials may suggest, the investment management process is more complicated than ever before. Products have become increasingly complex, tax law continues to change, and portfolio strategies continue to evolve.

Our approach to investing is grounded in time-tested philosophies and designed to stay relevant in this ever-changing world. And our investment management process goes far deeper than selecting a basket of mutual funds. In brief, our responsibilities include:

Portfolio Management

- Understanding your investment goals and objectives
- Choosing an appropriate asset allocation strategy tailored to target your goals
- Drafting a written investment proposal and/or an investment policy statement consistent with your goals and objectives
- Screening and selecting appropriate money managers, mutual funds, and other investment vehicles
- Implementing your portfolio
- Monitoring your portfolio on both an asset class- and fund-specific level
- Analyzing the tax aspects of your portfolio and underlying investments
- Rebalancing your portfolio to maintain the original asset allocation

Goal Management

- Balancing your risk tolerance with your accumulation target
- Continually assessing the market and asset classes

Relationship Management

- Helping you manage the emotional swings associated with investing
- Uncovering your hidden feelings about money
- Ensuring that assets are properly titled
- Conducting beneficiary reviews
- Monitoring the markets and allaying concerns you might have

We're happy to provide you with additional details about our investment management process and all that goes on behind the scenes to ensure that your wealth is securely invested.



THE ADVISOR-CLIENT PARTNERSHIP

An important partnership exists between a client and his or her advisor. To help clarify this relationship and avoid misunderstandings, the roles of both the advisor and the client are laid out below.

Advisor Responsibility

- Knowing the client's financial needs, goals, and changing situation
- Maintaining confidentiality—keeping all information pertaining to the client's finances private
- Constructing an asset allocation strategy to match the client's objectives
- Selecting specific securities for the client's portfolio
- Frequently communicating with the client through monthly and quarterly reports, as well as through meetings
- Rebalancing the client's assets over time
- Reallocating the client's assets as circumstances change

Joint Responsibility

- Determining the investment objectives—developing a mutual understanding as to the client's risk tolerance and anticipated returns
- Determining product selection—agreeing on the types of investments (mutual funds, stocks, annuities, etc.) that will be incorporated into the client's portfolio
- Monitoring performance
- Determining taxable consequences—the client must inform the advisor of his or her tax situation so that the client and the advisor can build a tax-efficient portfolio

Client Responsibility

- Providing the advisor with all financially relevant information
- Establishing financial goals
- Notifying the advisor of liquidity needs and expected cash flow
- Informing the advisor of any change in objectives and financial situation
- Trusting the advisor's expertise



THE IMPORTANCE OF OPEN COMMUNICATION

In the first stage of the wealth management process, we'll identify your goals and objectives. But that's just the start. The more information that flows between us, the more successful our relationship will be.

If you're married, your relationship with your spouse will affect the way we manage your assets. If you have children, your strategy for meeting their educational needs may be a significant part of your financial plan. If your parents are living, you could require funds to subsidize their lives. And if you own a small business on the side? You may be eligible for tax breaks that you are not aware of. The list goes on and on.

If our financial plans were not customized to every investor who enters our office, your personal information would be less relevant. But because we strive to suit each investor's personal goals and needs, we must understand your entire financial situation, as well as the daily circumstances of your life.

Investing is one part theory and one part emotion. The theory states that, based on your age, risk tolerance, time horizon, goals, and needs, we can construct an appropriate plan. But there are many types of risk to consider. There are fiscal risks that you might be willing to take on paper, but your emotions say otherwise. Communication is the key to any successful relationship—particularly in the relationship between the investor and the advisor, where mutual understanding dictates our actions.

As such, it is essential for us to understand your values and concerns, as well as your personal and family situation. The more we know, the better we can do for your particular situation.



For example, there are subjects that you may not be eager to broach early on in our relationship, but they could have a significant impact on your plan. If you have a child with disabilities, we could explore a special needs trust. If you are afraid of market volatility but know that you need the returns available through equities, we might set up stop-loss orders. If you are nearing retirement, we need to accurately assess your income needs going forward. If you are philanthropic, let us know.

In short, the more information that flows between us, the more successful our relationship will be. If you suspect that some facet of your life could affect your financial plan, you should disclose that information. We are partners on this journey, and open communication is the key to our relationship.



WHY WE ASK FOR CERTAIN INFORMATION

Much of the information we request is relevant to us as we address your investment and financial planning needs. Other information we request in order to comply with regulatory requirements, including FINRA Rule 2090 and Rule 2111. The goal of these regulations is to protect investors by ensuring that their financial professional completely understands their personal circumstances before providing and implementing financial guidance.

Rule 2090

Rule 2090, also called the “Know Your Customer” rule, applies to opening and maintaining client accounts. Under this rule, our firm must:

- Use reasonable diligence on every account that we open and maintain
- Know and retain the essential facts concerning every client in order to:
 - Effectively service the account;
 - Act in accordance with any special handling instructions;
 - Understand the authority of each person acting on behalf of the account; and
 - Comply with applicable laws, regulations and rules.
- Know this information not just at the time we establish an account but throughout our relationship with the client

Rule 2090 benefits our clients by ensuring that we stay abreast of any changes in your circumstances, helping avoid inadvertent mishandling of your portfolio.

Rule 2111

Rule 2111, also known as the “Suitability” rule, applies to transactions or investment strategies recommended by our firm and their appropriateness for your specific situation. In order to help ensure that we provide the most suitable recommendations to you, we match investments and investment strategies to the account investment profile information you provide to us. Your account investment profile includes:

- Age
- Financial situation and needs
- Investment objectives, experience, and time horizon
- Liquidity needs
- Risk tolerance
- Tax status
- Other investments

Rule 2111 reinforces our firm’s obligation to fully understand the products we recommend and to ensure that they are suited to you.

Protecting your interests

We appreciate your taking the time to provide us with this important information. Your efforts will help us ensure that we are abiding by regulations and, most important, providing you with the most appropriate financial guidance.

You can learn more about financial regulations designed to protect you at: www.finra.org/Investors/ProtectYourself.

