

Item 1: Cover Page

Firm Brochure

(Part 2A of Form ADV)

Colleen Weber CPA, LLC.

470 W. 78th St. Suite 210

Chanhassen, MN 55317

952-470-0750

www.ColleenWeber.com

mail@colleenweber.com

This brochure provides information about the qualifications and business practices of Colleen Weber CPA, LLC. If you have any questions about the contents of this brochure, please contact us at: 952-470-0750 or by email at: mail@colleenweber.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Colleen Weber CPA, LLC is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Colleen Weber CPA, LLC. is 133181.

Registration with the SEC and other state securities authorities as a registered investment adviser does not imply a certain level of skill or training.

JULY 22, 2020

Item 2: Material Changes

The purpose of this section is to discuss only material changes since the last annual update of Colleen Weber CPA, LLC's Investment Advisor Brochure.

The date of the last annual update was 3/30/2020.

Summary of Material Changes:

1. Item 6 heading was updated to indicate: Performance-Based Fees and Side-by-Side Management

Background

The SEC adopted "Amendments to Form ADV" in July, 2010. As you will see, this document is a narrative that is substantially different in form and content, and includes some new information that we were not previously required to disclose.

After our initial filing of this Brochure, this Item will be used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information. Consistent with the new rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 952-470-0750 or by email at: mail@colleenweber.com.

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Item 4: Advisory Business

Firm Description

Weber Contracting, LLC d/b/a Colleen Weber CPA, LLC (hereafter referred to as COLLEEN WEBER CPA, LLC) was founded in 1998.

COLLEEN WEBER CPA, LLC provides personalized confidential financial planning and investment management to individuals, trusts, estates, and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Investment advice is an integral part of financial planning. Investment advice and management is provided with our clients providing guidance in respect to their overall risk tolerance and desired asset allocation. COLLEEN WEBER CPA, LLC does not act as a custodian of client assets, and clients always receive statements and trade confirmations from an independent custodian. We place trades for clients under a limited power of attorney.

COLLEEN WEBER CPA, LLC is strictly a fee-only financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

Principal Owners

Colleen Weber is 100% stockholder.

Types of Advisory Services

COLLEEN WEBER CPA, LLC provides both financial planning and investment management services.

Non-Participation in Wrap Fee Programs

COLLEEN WEBER CPA, LLC as a matter of policy and practice does not sponsor any wrap fee programs. By definition, a wrap-fee program bundles or wraps investment advice, custody and execution services

under one contract for a single fee.

Amount of Assets Under Management

As of 12/31/19, COLLEEN WEBER CPA, LLC manages approximately \$70,934,000 in assets for approximately 41 clients. Approximately \$70,934,000 is managed on a discretionary basis, and \$0 is managed on a non-discretionary basis.

Tailored Relationships

The goals and objectives for each client are documented in our client relationship management system. Investment policy statements are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without client consent.

Types of Agreements

The following describes the typical client relationship.

Wealth Management Services: "Wealth Management Program" clients engage COLLEEN WEBER CPA, LLC to provide discretionary investment management of some or all of their accounts and ongoing financial planning consulting.

Due to the long-term nature of investing as well as the broadly diversified investments based on indexed asset classes, COLLEEN WEBER CPA, LLC provides periodic account review, investment execution, and monitoring. Accounts are typically reviewed not less frequently than quarterly or upon client request (usually regarding cash flow or liquidity needs or changes in client's goals or circumstances).

Financial Planning Consulting

In general, financial planning consulting is performed in conjunction with our investment management services and, depending on the client's specific needs, may include any one or all of the following:

1. Retirement Planning - This involves advice with respect to alternatives and techniques for accumulating wealth for retirement income or advice relative to appropriate distribution of assets following retirement. Tax consequences and their implications are identified and evaluated.
2. Investment Planning - This involves advice with respect to asset allocation and investment income accumulation techniques. Evaluations are made of existing investments in terms of their economic and tax characteristics as well as their suitability for meeting client's objectives. Tax consequences and their implications are identified and evaluated.
3. Estate Planning - This involves advice with respect to property ownership, distribution strategies, estate tax reduction, and tax payment techniques. It involves a discussion of gifts, trusts, etc., and the disposition of business

interests. Tax consequences and their implications are identified and evaluated.

4. Insurance Planning - This includes risk management associated with advisory recommendations based on the combination of insurance types that best meet a client's specific needs.

5. Education Planning - This includes alternatives and strategies with respect to the complete or partial funding of college or other post-secondary education experience. Tax consequences and their implications are identified and evaluated.

6. Tax Planning - This encompasses a large array of services that are customized to the individual client's specific financial circumstances. COLLEEN WEBER CPA, LLC may offer advice as to how tax laws will effect various financial decisions, e.g. acquisitions, pension strategy, investing in new opportunities or consolidation of existing investments, and individual taxation issues, among others.

Discretionary Investment Management

Assets are invested primarily in no-load mutual funds and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. COLLEEN WEBER CPA, LLC does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through COLLEEN WEBER CPA, LLC.

Termination of Agreement

A Client may terminate any of the aforementioned agreements with 30 days notice by notifying COLLEEN WEBER CPA, LLC in writing and paying the rate for the time spent on the engagement prior to notification of termination. If the client made an advance payment, COLLEEN WEBER CPA, LLC will refund any unearned portion of the advance payment.

COLLEEN WEBER CPA, LLC may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, COLLEEN WEBER CPA, LLC will refund any unearned portion of the advance payment.

Item 5: Fees and Compensation

Description

COLLEEN WEBER CPA, LLC sets its fees for the *Wealth Management Services* based on the complexity of work. Fees are negotiable.

Fee Billing

Wealth Management Services:

Fees for Investment Management Services are charged quarterly in advance. Fees are pro-rated, payable within the first 15 days of the quarter, or upon contract execution. Client authorizes COLLEEN WEBER CPA, LLC to debit fees directly from one or more designated accounts. COLLEEN WEBER CPA, LLC may change its recurring fee by notifying the client at least 14 days in advance of the fee change.

The quarterly fee charged may vary from client to client, but will be relatively consistent across clients of a similar nature. Fees are assessed based on factors such as number of accounts, account sizes, number of positions, services provided, complexity of account management, and complexity of financial planning services as appropriate. Quarterly Investment Management Services fees range from \$2,000 - \$10,000.

Fees are negotiable at the sole discretion of COLLEEN WEBER CPA, LLC. COLLEEN WEBER CPA, LLC, in its sole discretion, may waive its minimum fee and/or charge a lesser fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.). COLLEEN WEBER CPA, LLC does not solicit prepayment of more than \$500 in fees per client six (6) months in advance.

Other Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees we charge.

All brokerage commissions, stock transfer fees, and other similar charges incurred in connection with transactions for the account will be paid out of the assets in the account and are in addition to the investment management fees paid to us. While we take measures to ensure the fees charged are accurate, it is your responsibility to ensure the amount of fee charged is correct.

Termination of Agreement

COLLEEN WEBER CPA, LLC reserves the right to terminate any engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in COLLEEN WEBER CPA, LLC's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

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

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

COLLEEN WEBER CPA, LLC does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7: Types of Clients

Description

COLLEEN WEBER CPA, LLC generally provides investment advice to individuals, trusts, estates, corporations or business entities. Client relationships vary in scope and length of service.

Account Minimums

COLLEEN WEBER CPA, LLC does not set any limits on size of investment accounts or client net worth. However, there is a \$2,000 minimum fee for Wealth Management Services.

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

Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Investment Strategies

COLLEEN WEBER CPA, LLC provides Investment Supervisory Services, defined as giving continuous advice to a client or making investments for a client based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, COLLEEN WEBER CPA, LLC develops a client's personal investment policy and creates and manages a portfolio based on that policy. COLLEEN WEBER CPA, LLC will manage advisory accounts on a discretionary basis. Account supervision is guided by the stated objectives of the client (i.e., maximum capital appreciation, growth, income, or growth and income).

COLLEEN WEBER CPA, LLC will create a portfolio consisting of one or all of the following: individual equities, bonds, other investment products, and no load mutual funds and exchange traded funds. COLLEEN WEBER CPA, LLC will allocate the client's assets among various investments taking into consideration the overall management style selected by the client. The mutual funds will be selected on the basis of any or all of the following criteria: the fund's performance history; the industry sector in which the fund invests; the track record of the fund's manager; the fund's investment objectives; the fund's management style and philosophy; and the fund's management fee structure. Portfolio weighting between funds and market sectors will be determined by each client's individual needs and circumstances. Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the client's behalf. Clients will retain individual ownership of all securities.

When appropriate to the needs of the client, COLLEEN WEBER CPA, LLC may recommend the use of trading (securities sold within 30 days), short sales, and/or margin transactions. Because these investment strategies involve certain additional degrees of risk, they will only be recommended when consistent with the client's stated tolerance for risk.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic

and social conditions may trigger market events.

- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Small Company Risk:** Securities of small companies are often less liquid than those of large companies and this could make it difficult to sell a small company security at a desired time or price. As a result, small company stocks may fluctuate relatively more in price. In general, smaller capitalization companies are also more vulnerable than larger companies to adverse business or economic developments and they may have more limited resources.
- **Value Investment Risk:** Value stocks may perform differently from the market as a whole and following a value oriented investment strategy may cause the portfolio to at times underperform equity funds that use other investment strategies.

Item 9: Disciplinary Information

Legal and Disciplinary

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events of their firm or certain management personnel which would be material to your evaluation of the

firm or the integrity of the firm's management of your investment portfolio.

COLLEEN WEBER CPA, LLC and its' employees *HAVE NOT* been involved in legal or disciplinary events related to past or present investment clients.

Item 10: Other Financial Industry Activities and Affiliations

Financial Industry Activities

COLLEEN WEBER CPA, LLC *IS NOT* registered (and *DOES NOT* have an application pending) as a broker-dealer, municipal securities dealer or government securities dealer or broker.

COLLEEN WEBER CPA, LLC *IS NOT* registered (and *DOES NOT* have an application pending) as a future commissions merchant, commodity pool operator, a commodity trading advisor or an associated person of the foregoing entities.

Affiliations

COLLEEN WEBER CPA, LLC *DOES NOT* have any relationship or arrangement that involves any remuneration of fees with any of the below listed:

- Broker-dealer, municipal securities dealer or government securities dealer or broker.
- Investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
- Other investment adviser or financial planner
- Futures commission merchant, commodity pool operator, or commodity trading advisor
- Banking or thrift institution
- Lawyer or law firm
- Insurance company or agency
- Pension consultant
- Real estate broker or dealer
- Sponsor or syndicator of limited partnerships

COLLEEN WEBER CPA, LLC *DOES* have a relationship or arrangement that involves any remuneration of fees with any of the below listed:

Accountant or accounting firm: Colleen Weber CPA, LLC provides income tax planning, tax return preparation to individuals and small business consulting. The time spent on these activities equates to

2.5% of the business activity.

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

Code of Ethics

The employees of COLLEEN WEBER CPA, LLC have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The key component of our Code of Ethics states:

COLLEEN WEBER CPA, LLC and its investment advisor representatives and employees shall always:

- *Act in the best interests of each and every client;*
- *Act with integrity and dignity when dealing with clients, prospects, team members and others;*
- *Seek at all times to preserve our firm's independence and to maintain our complete objectivity with respect to our advisory services and each recommendation made to our clients.*

The Code of Ethics further includes our firms' policy prohibiting the use of material non-public information and protecting the confidentiality of client information. Therefore, COLLEEN WEBER CPA, LLC's Code of Ethics prohibits employees from trading in any security in which a client is deemed an insider or privy to insider's information, i.e., not available to the public or disclosing any confidential information of any client.

COLLEEN WEBER CPA, LLC requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to discipline.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

COLLEEN WEBER CPA, LLC and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the COLLEEN WEBER CPA, LLC *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of COLLEEN WEBER CPA, LLC is Colleen Weber. Since most trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Item 12: Brokerage Practices

Selecting Brokerage Firms

As COLLEEN WEBER CPA, LLC does not have the discretionary authority to determine the broker dealer to be used or the commission rates to be paid, clients must direct COLLEEN WEBER CPA, LLC as to the broker dealer to be used. In directing the use of a particular broker or dealer, it should be understood that COLLEEN WEBER CPA, LLC will not have authority to negotiate commissions among various brokers or obtain volume discounts, and best execution may not be achieved. In addition, a disparity in commission charges may exist between the commissions charged to other clients.

COLLEEN WEBER CPA, LLC participates in Schwab Institutional Services program offered to independent investment advisers by Schwab Institutional Services Institutional Services, a division of Schwab Institutional Services Inc., Member NYSE/SIPC (Schwab Institutional Services).

Clients in need of brokerage and custodial services may have Schwab Institutional Services recommended to them. As part of the Schwab Institutional Services program, COLLEEN WEBER CPA, LLC receives benefits that it would not receive if it did not offer investment advice. Products and services provided by Schwab may benefit us and may not directly benefit you or your account. Our recommendation that you place assets with Schwab may be based in part on these benefits and not solely on the nature, cost or quality of custody and execution services provided, which creates a conflict of interest. We endeavor at all times to put Clients' interests first as a part of our fiduciary duty.

Clients may request that brokerage transactions be directed to a particular broker or dealer. However, if COLLEEN WEBER CPA, LLC believes that the use of that broker dealer would hinder COLLEEN WEBER CPA, LLC in meeting its fiduciary obligations, COLLEEN WEBER CPA, LLC will not be able to accept the account.

Best Execution

COLLEEN WEBER CPA, LLC reviews the execution of trades at each custodian each quarter. The review is documented in the COLLEEN WEBER CPA, LLC *Compliance Manual*. Trading fees charged by the custodians is also reviewed on a quarterly basis. COLLEEN WEBER CPA, LLC does not receive any portion of the trading fees.

Soft Dollars

COLLEEN WEBER CPA, LLC *DOES NOT* engage in any soft dollar agreements.

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

Item 13: Review of Accounts

Periodic Reviews

Account reviews are performed no less frequently than quarterly by Colleen Weber, CFP®. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Regular Reports

Investment clients meet with their COLLEEN WEBER CPA, LLC advisor on at least an annual basis.

At least quarterly statements are sent to the client directly from the account custodian (specifically, Schwab Institutional Services). These statements reflect the assets in the custodian's custody, together with confirmations of each transaction executed in the account(s) if desired by the client. Clients may elect to receive these statements by e-mail rather than U.S. mail.

Clients may also directly access account information at the custodian with which the accounts are held online (specifically, Schwab Institutional Services) each and every business day via their secure web site.

Item 14: Client Referrals and Other Compensation

Incoming Referrals

COLLEEN WEBER CPA, LLC has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

COLLEEN WEBER CPA, LLC does not accept referral fees or any form of remuneration from other professionals when a prospect or

client is referred to them.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by COLLEEN WEBER CPA, LLC.

Item 16: Investment Discretion

Discretionary Authority for Trading

COLLEEN WEBER CPA, LLC accepts discretionary authority to manage securities accounts on behalf of clients. COLLEEN WEBER CPA, LLC has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

The client determines the qualified custodian to be used and, as a result, accepts the commission rates charged by the qualified custodian. COLLEEN WEBER CPA, LLC does not receive any portion of the transaction fees or commissions paid by the client to the qualified custodian.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. Clients sign a limited power of attorney with the qualified custodian so that we may execute the trades that you have approved.

Item 17: Voting Client Securities

Proxy Votes

COLLEEN WEBER CPA, LLC does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, COLLEEN WEBER CPA, LLC will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Item 18: Financial Information

Financial Condition

COLLEEN WEBER CPA, LLC does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because COLLEEN WEBER CPA, LLC does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$500 per client, and six months or more in advance.

Item 19: Requirements for State Registered Advisors

COLLEEN WEBER CPA, LLC's Principal Executive Officer is Colleen A. Weber. Information regarding Ms. Weber's Education, Background and Other Businesses can be found in her supplemental ADV Part 2B brochure.

As stated in Item 6, COLLEEN WEBER CPA, LLC does not accept performance-based fees or other fees based on a share of capital gains on or on capital appreciation of client assets.

Neither COLLEEN WEBER CPA, LLC nor our employees have been involved in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Neither COLLEEN WEBER CPA, LLC nor our employees have any relevant material relationships with issuers of securities.

Business Continuity Plan

General

COLLEEN WEBER CPA, LLC has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Information Security Program

Information Security

COLLEEN WEBER CPA, LLC maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

COLLEEN WEBER CPA, LLC is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.