

calendar years from the initial advisory relationship, subject to Advisor fee minimums. Two conditions are required: first, substantially all Client investible assets (usually 95% apart from modest bank account balances) are subject to billing, and then average or lower levels of advisory services are provided for two prior calendar years and expected to be the same going forward.

Advisor’s investment advisory fee may be negotiable for certain persons at our discretion, depending upon objective and subjective factors including but not limited to: the total amount of assets to be managed; portfolio composition; the scope and complexity of the engagement; the anticipated number of meetings and servicing needs; related household or family accounts; future expected earning capacity; anticipated future additional assets; the professional(s) rendering the service(s); prior relationships with us and/or our representatives, and other negotiations with the client.

As a result of these factors, similarly situated clients could pay different fees, the services to be provided for any particular client could be available at lower fees with a different advisor of the firm, and certain institutional clients may have fees different than those specifically set forth above. For instance, for assets held with Schwab Trust Company subject to trustee fees will use the non-custodial account Schedule on this page.

2. Investment Management—Non-Custodial Client

Accounts. The investment management schedule below applies to assets in most employer retirement plans, deferred compensation arrangements, variable annuities and certain specialized life insurance arrangements. These on-custodial accounts are coordinated with Schwab custodial account to complement the overall investment strategy allocation. Fees for these accounts are calculated “on top of” Schwab custodial for the best pricing and included as offsets for household minimum fees calculations.

B. Clients may have advisory fees deducted from the corresponding custodial accounts or pay Advisor directly. Billings are quarterly in advance. Billings are based upon the market value of the assets on the last business day of the previous quarter, subject to service-level minimums. Broker-dealer/custodial agreements with Charles Schwab authorize

debiting accounts proportionally for the annualized fee (ordinarily one-fourth of the annualized rate quarterly in Client billing statements) and to directly remit that investment advisory fee deducted to Advisor in compliance with certain regulatory procedures where Client does not pay Advisor directly.

Where fees are payable for non-custodial accounts or for a minimum quarterly fee adjustment, those fees will first be deducted from qualified custodial accounts (such as IRAs), and then from non-qualified custodial accounts. Where spouses mutually hold powers of attorney for custodial accounts of their household, then any account may be debited for fees. The Client may request that fees be deducted only from specific accounts. For Clients paying advisory fees directly, fees unpaid at least thirty days after the current quarter begin automatically will be debited. Supplemental fees under a *Wealth Planning Consulting Agreement* may be debited from custodial accounts with Client’s permission in the agreement.

C. As discussed in *Item 12*, unless the Client directs otherwise or circumstances dictate, Advisor recommends that Charles Schwab and Co., Inc. (“Charles Schwab”) serve as the broker-dealer/custodian for investment advisory assets. Charles Schwab charges brokerage commissions and/or transaction fees for effecting certain securities transactions. Charles Schwab’s maximum internet transaction fee for mutual funds is \$25, and \$0 for ETFs and stocks (bid-ask spreads will apply). In addition to all these fees, Clients also incurs charges imposed at the fund level with all mutual fund and exchange traded funds (e.g. regular management fees and other maintenance expenses).

Advisor primarily recommends investments with Dimensional Fund Advisors. Dimensional Fund Advisors institutional-class mutual fund charges may range from .08% to .85% annualized (net to investor).

Other investments Advisor recommends include 529 college plans and deferred annuities that have maintenance and expense (M&E) charges at the account level in addition to fund expenses. Examples are Hartford Life Insurance (WV SMART529 Select) for static and age-based portfolios ranges from .67% to 1.02% annually including mutual fund charges. Transamerica Life (NY) Advisors Edge charges .55% annual M&E and administration charge plus a \$30 annual policy charge excluding mutual fund management fees plus the cost of optional benefits. Lincoln Financial Group Advantage RIA Class annuities have no annual policy charge and a .35% maximum M&E and administration charge excluding mutual fund management fees plus the cost of optional benefits. (Lincoln is not available in New York.)

D. Advisor’s annual management investment advisory fee shall be prorated and paid quarterly, in advance, based upon quarterly beginning account balances. A prorated minimum fee paid quarterly, applies to “Supreme”, “Premier”, and “Preferred” level clients as described in *Item 4 (B)*. Investment Management Schedule fee calculations offset the applicable minimum fee.

Advisor, in its sole discretion, may charge a lesser investment management fee and/or reduce or waive its annual minimum fee based on certain criteria (i.e., relationship to

**NON-CUSTODIAL ACCOUNTS:
INVESTMENT MANAGEMENT SCHEDULE**

Aggregate Advisory Assets Supervised	Per Quarter	Annualized Rate
First \$1 million	0.250%	1.00%
Next \$1 million to \$5 million	0.200%	0.80%
Next \$10 million to \$15 million	0.125%	0.50%
Next \$10 million to \$25 million	0.100%	0.40%
Next \$25 million to \$50 million	0.075%	0.30%
More than \$50 million	0.050%	0.20%

Subject to minimum annual fee for level. In some cases an additional 20 bps discount will be allowed (prorated quarterly). These fees coordinate with the custodial Investment Management Schedule on page 7.