

**DISCLOSURE BROCHURE**  
PREPARED IN COMPLIANCE WITH  
THE INVESTMENT ADVISERS ACT OF 1940 RULE 204-3(A)



**CHANDELEUR  
INVESTMENT  
CONSULTING, LLC**

A REGISTERED INVESTMENT ADVISOR

CRD #: 140971  
Chandeleur Investment Consulting, LLC  
REGISTERED INVESTMENT ADVISOR

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This Disclosure Brochure provides information about the qualifications and business practices of Chandeleur Investment Consulting, LLC, which should be considered before becoming a client. Please contact Mr. Bryan K. Trochessett if you have any questions about the contents of this brochure.

The information contained in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Administrator.

BROCHURE  
DATED  
**29**  
**SEPTEMBER**  
**2010**

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## Material Changes

There have been no material changes made to this document since the last revision date indicated on the cover of this Disclosure Brochure.

# EXECUTIVE

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## summary

### MISSION STATEMENT

The mission of Chandeleur Investment Consulting, LLC (hereinafter referred to as "the Company", "we", "us" and "our") is to be a trusted friend in the financial services business, helping individuals to be good stewards of their wealth by cultivating long-term relationships, delivering thoughtful service, and providing objective financial advice.

### BUSINESS FOCUS

The Company is a registered investment advisor<sup>1</sup> focused on assisting individuals and their families, trusts, estates, fiduciaries, charitable organizations, corporations and other business entities and their owners (hereinafter referred to as the "client") manage their wealth and make intelligent, informed decisions on the complex financial options available in today's economic environment. Our central duty is to provide investment counsel and guidance, which stresses fiscal responsibility and disciplined economic decision making that is ultimately designed to protect the client's monetary needs for today, tomorrow, and in the future. We provide this service through:

- ❖ Counsel with clients to provide perspective and advice on how to best navigate the current economic and investment environment.
- ❖ Tailored investment strategies designed to address the client's predefined parameters and benchmarks.
- ❖ Active investment and risk management strategies to attain financial goals.
- ❖ Monitoring the investment performance of such management strategies.

Earning the client's trust and confidence is a great compliment. We understand that when this is accomplished, the client is at peace knowing their financial affairs are being managed with their best interest always in mind.

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<sup>1</sup> The term "registered investment advisor" is not intended to imply that Chandeleur Investment Consulting, LLC has attained a certain level of skill or training. It is used strictly to reference the fact that we are "registered" as an "investment advisor" with the Florida Department of Financial Services and the Mississippi Secretary of State Regulation and Enforcement – and with such other regulatory agencies that may have limited regulatory jurisdiction over our business practices.

## DEVELOPING INVESTMENT PARAMETERS

We will often engage a new client in a pre-advisory consultation to gain better insight into their individual needs. Through this consultation, we may begin our evaluation of the client's investment personality by having them complete a profile questionnaire<sup>2</sup> and discuss issues such as their investment return expectations, economic outlook, prior investment experience, goals and objectives, and a preferred approach for meeting such goals and objectives.

With the complexity of today's marketplace, it is critical for us to understand the needs of a new client. We must have a clear picture of their investment personality so that we can develop a successful investment plan and tailored asset allocation guideline. If the client has difficulty expressing their investment parameters or does not truly have a grasp of their overall personal finances, a financial plan may be suggested to the client before proceeding with any investment services.

The pre-advisory consultation, the profile questionnaire, and, if necessary, a financial plan, will assist with eliminating much of the guesswork in achieving financial security and independence for the client by simplifying these financial alternatives. In return, we will have:

- ❖ Defined and narrowed objectives and investment options;
- ❖ Identified areas of greatest distress;
- ❖ Developed a strategy for addressing concerns about the future;
- ❖ Cultivated peace of mind; and,
- ❖ Created a unique picture of the client's overall financial personality.

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<sup>2</sup> The profile questionnaire we use is an important tool in gathering information about each client's investment methodology, risk tolerance, income/tax bracket, liquidity, time horizons, etc. If a client elects not to answer the questionnaire or chooses to respond with limited input, it is possible that we could operate in a handicapped capacity contrary to the client's investment needs. Therefore, if a client desires the most effective and accurate recommendations regarding their managed accounts, he or she should make every effort to provide us with their detailed personal needs and objectives, along with detailed financial and tax information.

# INVESTMENT

## management services

With the enormous complexity of investment choices and the challenges of maintaining a disciplined investment strategy, we feel that objective investment advice is beneficial to achieving the long-term results a client desires. We will construct a portfolio based on the client's goals and monitor the portfolio using market measurement and analytical techniques.

## INVESTMENT STRATEGY

Considering the multiple facets of a client's life, there is not one easy way to allocate investment assets. Time frames for any client are generally finite, goals change over time, and the desire to take risk changes, and therefore, traditional asset allocation models aren't comprehensive enough to address a client's investment needs. It is our belief that each client may have different levels of risk tolerances for different portions of their wealth, and having a simple asset allocation to address multiple needs is incomplete. To address this complex issue, we will use a broader wealth allocation framework ("Beyond Markowitz: A Comprehensive Wealth Allocation Framework for Individual Investors," Journal of Wealth Management, Spring 2005, pp. 8-34) that we believe will increase the probability of our clients reaching their goals. The charts below are guidelines of the asset allocation framework that will be used in creating investment strategies:

	RISK ALLOCATION RANGES		
	PERSONAL	MARKET	ASPIRATIONAL
Conservative	40% - 70%	30% - 50%	0% - 10%
Moderate	30% - 60%	40% - 60%	0% - 10%
Aggressive	20% - 40%	50% - 70%	10% - 20%



"PERSONAL" RISK <i>Do Not Jeopardize Basic Standard of Living</i>	"MARKET" RISK <i>Maintain Lifestyle</i>	"ASPIRATIONAL" RISK <i>Enhance Lifestyle</i>
Protective Assets	Market Assets	Aspirational Assets
Cash Home Short Term Safe Investments Immediate Annuities Hedging Using Options Insurance Human Capital	Stocks – Broad Size and Style Diversification Bonds – Quality and Duration Diversification Cash – Opportunistic Investing Alternative Investments – Fund of Funds and Liquid "Non- Traditional" Investments, e.g. Commodities	Real Estate Investments Individual Stocks Small Business Stock Options

Using the above wealth allocation framework allows the client to take appropriate risks within each category and helps prevent individuals from taking excessive risks.

## ASSET MANAGEMENT FEES

Our Asset Management fees are based on a percentage of assets under management. The fee is determined based on the fair market value of the client’s account on the last day of each closing calendar quarter multiplied by one-fourth of the corresponding annual percentage rate. The fee schedule is as follows:

<b>FEE SCHEDULE</b>	
MARKET VALUE*	ANNUAL FEE RATES <sup>†</sup> <small>NOT TO EXCEED</small>
First \$250,000.....	1.0 %
\$250,001 - \$500,000.....	0.75%
\$500,001 - \$750,000.....	0.5%
Amount over \$750,000.....	0.25%

\* The Company requires a minimum initial investment of \$50,000.00 to open any managed account. However, this minimum may be waived under certain circumstances  
<sup>†</sup> The Company retains discretion to modify the above fee structure depending on the size, complexity, and nature of the portfolio managed. The fees may be negotiable on a client-to-client basis.

## PROTOCOLS FOR INVESTMENT SERVICES

The following protocols establish how we handle our asset management accounts and what clients should expect when it comes to: (i) their bill for investment services; (ii) withdrawing funds from their account(s); (iii) other fees charged to their account(s); and, (iv) termination.

### Discretion

The Company will have discretionary authority on managed accounts.

### Billing

Each client is billed quarterly in advance to account based on the account value on the last day of the closing calendar quarter. For the first billing quarter, if the management account was not opened at the beginning/end of the quarter, the fee will be based upon a pro-rata calculation of the aggregate market value of the client’s assets to be managed for the period.

Advisory fees will be billed to the client or taken first from free credit balances or from any money market funds or balances. If such assets are insufficient to satisfy payment of such fees, a portion of the account assets will be liquidated to cover the fees. Such liquidation may affect the relative balances of the account.

### Fee Exclusions

The above fees for all our management services are exclusive of any charges imposed by the custodial firm, such as: (i) any Exchange/SEC fees; (ii) service or account charges, including, debit balances or postage/handling fees; and/or, (iii) transaction fees earned by the custodial firm for securities transactions.

In addition, all fees paid to us for management services are separate from any fees and expenses charged to shareholders of mutual fund shares by the investment company or by

the investment advisor managing the mutual fund portfolios. These expenses generally include management fees and various fund expense, such as: 12b-1 fees and contingent deferred sales charges. A complete explanation of these expenses charged by the mutual funds is contained in each mutual fund's prospectus. Clients are encouraged to carefully read the fund prospectus.

## Deposits and Withdrawals

Assets deposited by a client into their management account between billing cycles will not result in additional management fees being billed to the client unless such deposits exceed \$25,000. Such deposits of this amount or greater, in most cases, will require modifications and adjustments to a client's investment allocation. Therefore, a pro-rata fee based upon the number of days remaining in the current quarterly period may be assessed to the client for deposits exceeding the above amount.

For assets withdrawn by a client, the Company does not make partial refunds of their management fees. Just as with deposits, withdraws may require modifications and adjustments to be made in the account to correct the client's allocation of assets.

## Termination Provisions for Investment Services

Clients have up to five (5) full business days after entering into an Investment Advisory Agreement in which to cancel our investment services and not incur any management fee costs (custodial fees may still apply). After the five (5) day waiting period, termination of the Investment Advisory Agreement can only occur at the beginning/end of a calendar quarter. The Company does not make pro-rated refunds of the prepaid quarterly management fee.

To terminate investment advisory services, either party (the client or the Company) by written notification to the other party, may terminate the Investment Advisory Agreement at any time, provided such written notification is received at least 30 days prior to the end of the calendar quarter. Such notification should include any final instructions on the account (i.e., liquidate the account, finalize all transactions and/or cease all investment activity). Once the termination of investment advisory services has been implemented, neither party has any obligation to the other – the Company no longer earns management fees or gives investment advice and the client is responsible for making their own investment decisions.

# FINANCIAL

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## planning services

Should the initial one-on-one consultation reveal the need for financial planning, the Company can provide such services for respective clients depending on their needs and/or desires.

Financial planning is an evaluation of the investment and financial options available to a client based upon their defined economic criteria. Planning includes: (i) attempting to make optimal decisions; (ii) projecting the consequences of these decisions for the client in the form of a financial plan – a working blueprint; (iii) implementing the protocol to achieve the objectives of the plan; and then, (iv) comparing future performance against the working blueprint.

A financial plan can be coordinated – a mutually defined review of a client’s personal financial life needs – or targeted – a review, analysis and evaluation of one core area of financial need. In general, financial planning encompasses one or more of the following areas of concern:

- ❖ **Personal** – Family records, budgeting, personal liability, estate information and financial goals.
- ❖ **Education** – Education IRAs, financial aid, and state savings plans including 529 plans, grants and general assistance in preparing to meet dependents continuing educational needs through development of an education plan.
- ❖ **Taxes & Cash Flow** – Understanding the impact of various investments on a client’s current income tax and future tax liability.
- ❖ **Death & Disability** – Cash needs at death, income needs of surviving dependents, estate planning and income analysis.
- ❖ **Estate** – Reviewing estate planning documents, including wills and trusts, to determine if a client should seek the assistance of an estate planning attorney. Reviewing powers of attorney, nursing home and assisted living agreements, living trusts, and Medicare/Medicaid benefits.
- ❖ **Retirement** – Analysis of current strategies and investment plans to help you achieve your retirement goals.
- ❖ **Investments** – Analysis of investment alternatives and their effect on a client’s investment portfolio(s), including a risk and return analysis. Assessment of a client’s risk tolerance profile.
- ❖ **Real Estate** – Analysis of real estate investment opportunities.
- ❖ **Insurance** – Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.

## METHODOLOGY

Our financial planning methodology follows the six (6) steps specified in the Financial Planning Practice Standards established by the Certified Financial Planning Board.

1. Establishing and defining the client-planner relationship.
2. Gathering client data identifying both financial and personal goals and objectives.
3. Analyzing and evaluating the client's financial status.
4. Developing and presenting financial planning recommendations and/or alternatives.
5. Implementing the financial planning recommendations.
6. Monitoring the financial planning recommendations.

These standards build on serving the complete financial need of the client by implementing specific measures to solve problems and establish financial objectives that are in the best interest of the client.

## PREPARING THE FINANCIAL PLAN

We prepare financial plans in four (4) phases. These phases are defined as follows:

### Phase I – Evaluate

The evaluation process allows us to learn about the client by conducting personal interviews and completing questionnaires so that we can have a better understanding of the client's long-term goals and objectives and what they want to achieve financially. We approach this process assuming that the financial planning engagement will include all the planning disciplines discussed above; however, the client has the opportunity to prioritize their objectives and to remove from the process any areas that are not applicable to their circumstances. After this evaluation meeting, we will draft a report documenting the financial planning disciplines that the client wishes to address, which details specific objectives under each discipline. Redrafting and meeting can be repeated until the client is completely satisfied with the report. Depending upon the engagement, different levels of financial reporting will be undertaken. At a minimum, a statement of financial position, designed for financial planning use only, will be prepared.

### Phase II – Integrate

We define the financial plan as a series of blueprints designed to take the client from where they currently are financially, to where they want to be financially. This is the creative portion of the process. There are usually many different ways to accomplish a given goal. The objective, however, is to formulate a plan that the client will be comfortable executing. In some cases, the drafting of the plan reveals the need for us to help the client reconcile the gap between their expectations and their financial realities. Once a viable plan has been drafted, it is presented to and reviewed with the client. The draft and review process may be repeated until the client is satisfied with the financial plan.

### Phase III – Formulate

A financial plan is of limited value if it is not put into action. Accordingly, we place a premium on implementing<sup>3</sup> and monitoring the plan. The implementation schedule provides the client with a list of tasks and deadlines designed to ensure that the plan is put into action. The following are some examples of implementation: (i) drafting of appropriate estate documents (performed by an estate attorney); (ii) purchase of various insurance policies (performed by a licensed insurance agent); (iii) investment advisory services (performed by us, or another investment adviser/broker-dealer of the client's choice); (iv) adoption of a personal budget; and, (v) income tax planning (prepared by a CPA).

### Phase IV – Delegate

Once the plan has been built and the recommendations have been implemented it is critical that these recommendations be monitored on a continuing basis to assure that they remain consistent with the client's goals. This process requires periodic rebalancing of the portfolio to assure that our client's original objectives are maintained. Continued monitoring of established personal budgets and the continued effects of taxation on the plan are assessed regularly and continually for clients who have taken advantage of our Annual Retainer Agreement.

## FINANCIAL PLANNING FEES & TERMINATION

The Company's financial planning fees will be based on the size, complexity, and nature of each client's personal and financial situation and the amount of time it will take to analyze and summarize the plan and perform the services desired by the client for the year.

### Coordinated

All coordinated financial planning services are offered on a fixed fee basis and will not exceed \$50,000.00 for the initial engagement. Such fee will be fully disclosed up-front in a Financial Planning Contract ("Agreement"), which will include the cost<sup>4</sup> to review the client's financial information and prepare the coordinated financial plan. The Company has the option to: (i) require full payment up-front; (ii) require one-half the fee be paid at the time the Agreement is signed, with the remaining balance due upon completion of the financial plan; or, (iii) require one-half the fee be paid at the time the Agreement is signed, with the remaining balance billed monthly on a progress basis as the work is completed.

### Targeted

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<sup>3</sup> Implementing the recommendations made in a financial plan often requires consultation or coordination with one or more outside professionals (e.g.: attorneys, CPAs, insurance and securities representatives). All information provided by and received from the client will be kept entirely confidential, not only by us, but by the outside professionals as well. Such information will be disclosed to third parties only with mutual consent or as may be permitted or required by law.

<sup>4</sup> Rarely will a fee exceed those costs outlined in the Agreement. However, there can be instances where we did not contract with the client to perform a particular task and therefore merit notifying the client of the additional cost prior to beginning such services.

If a client desires only targeted financial planning – review, analysis and evaluation of a core area of financial need – the fee will be billed at a rate not to exceed \$175.00 per hour<sup>5</sup>. All fees will be completely itemized in a billing statement to the client, or as otherwise predetermined in a proposal, engagement letter and/or by retainer.

### Annual Retainer Agreement

Material changes in a client's personal circumstances, the general economy, or tax law changes are some of the reasons why the recommendations made in a financial plan should be reviewed periodically and possibly adjusted. It is also important to note, that a client's risk profile changes over time. We strongly suggest that the overall financial plan be reviewed not less than on an annual basis. If a client elects an Annual Retainer Agreement, we will notify the client of the annual cost to perform the desired work at the beginning of each year. Such retainer fee will be equal to one-half of the coordinated financial planning fee we originally charged and billed on a quarterly basis to the client.

### Termination of Financial Planning Services

Clients will have five (5) full business days to terminate the Agreement. Should a client wish to terminate the Agreement after such time period and before presentation of the financial plan, we will be compensated through the date of termination for time spent in design of the financial plan at the hourly rate agreed to by both parties in the Agreement. After the financial plan has been completed and presented to the client, termination of the Agreement is no longer an option.

Targeted financial planning can be terminated at any time. The Company will bill the client for any services rendered from the date of the last bill up to the date of termination at the agreed upon hourly rate.

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<sup>5</sup> For a targeted financial plan, the Company requires a minimum of three hours consultation to address any personal and financial needs of the client.

# QUALIFICATIONS

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## and advisory responsibilities

### BUSINESS QUALIFICATIONS

Mr. Bryan K. Trochessett is responsible for the leadership and direction of the Company, as well as, ensuring the investment activities are being performed to the expectations of the clients.

Mr. Trochessett has over 6 years of professional experience in the areas of personal finance and investment planning. His qualifications and experience includes the following:

#### **Mr. Bryan K. Trochessett**

CRD #: 4403771  
Date of Birth: May 25, 1974

**Education:** Mississippi State University – B.A. Mathematics  
Mississippi State University – M.B.A.: Business Administration

INACTIVE LICENSES  
NASD Exams: Series 7 and 66  
Florida Life Health & Variable Annuity Insurance License

**Business:** 06/2006 – Present ..... Chandeleur Investment Consulting, LLC  
**Position:** Managing Member | Chief Investment Officer  
05/2001 – 04/2006 ..... Merrill Lynch, Pierce, Fenner & Smith, Incorporated  
**Position:** Broker

### ACCOUNT RESPONSIBILITY

Each account is reviewed on an ongoing basis to ensure that the client's needs and objectives are being met. All accounts are reviewed in the context of the clients stated investment objectives and guidelines. Cash needs will be adjusted as necessary. In addition, clients will receive at least quarterly statements from the brokerage firm where their accounts are custodied. Each statement will summarize the specific investments currently held the value of the client's portfolio and account transactions.

If we have designed a financial plan for a client, it is recommended that it be reviewed at least annually. Material changes in the client's personal circumstances, the general economy, or tax law changes can trigger more frequent reviews. However, it is the clients responsibility to communicate these changes to the Company so that the appropriate adjustments can be made

### EDUCATION & BUSINESS STANDARDS

Any Investment Advisory Representatives retained by the Company will be required to have earned a four-year undergraduate degree or the equivalent and suitable experience in fields directly related to investments and financial planning, as well as the required examinations and qualifications to act as such.

## **METHOD OF ANALYSIS, SOURCES OF INFORMATION & INVESTMENT STRATEGIES**

### **Methods of Analysis**

In analyzing ETFs, mutual funds, stock and bond investments, the Company will use a fundamental and technical approach to gathering information. Such analysis considers: economic conditions, earnings, cash flow, book value projections, industry outlook, politics (as it relates to investments), historical data, price-earnings ratios, dividends, general level of interest rates, company management, debt ratios and tax benefits to guide the Company in its allocation decisions.

### **Sources of Information**

The Company relies on numerous financial publications as well as independent research sources for information. Other sources may include, but are not limited to, domestic, international and governmental newspapers, bulletins, magazines, books and other professional subscription services. On occasion, we will use material prepared by investment companies and research releases prepared by other research companies.

### **Investment Strategies**

The Company generally recommends long-term investment strategies requiring a minimum of a five year time horizon.

# DISCLOSURES

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## and conflicting interests

### CLIENT TRANSACTIONS

The Company has a fiduciary duty to ensure that your welfare is not subordinated to any interests of the Company or any of its personnel. The following disclosures are internal guidelines we have adopted to assist us in protecting you and all of our clientele.

#### Participation or Interests

It is against Company policies for Mr. Bryan K. Trochessett, or any future owners, officers, or employees to invest with a client or with a group of clients, or to advise a client or a group of clients to invest in a private business interest or other non-marketable investment unless prior approval has been granted by Mr. Trochessett, and such investment is not in violation of any SEC and/or State rules and regulations.

Mr. Trochessett is permitted to personally invest his own monies in stocks (OTC and Listed), bonds, investment company products and other publicly traded securities, which may also be, from time to time, recommended to clients. Such investment purchases are independent of, and are not connected in any way to, investment decisions made on behalf of the Company's clients. Personal trading activities conducted by the Company's officers, directors and employees are monitored by Mr. Trochessett to ensure that such activities do not impact upon client security or create conflicts of interest.

#### Insider Trading Activities

The Company is in compliance with the Insider Trading and Securities Fraud Enforcement Act of 1988. The Company does not share any non-public information with anyone who does not need to know.

#### Code of Ethics

As a fiduciary, the Company has an affirmative duty to render continuous, unbiased investment advice, and at all times act in the clients' best interest. To maintain this ethical responsibility to clients, the Company has adopted a Code of Ethics that establishes the fundamental principles of conduct and professionalism expected by all personnel in discharging their duties. This Code is a value-laden guide committing such persons to uphold the highest ethical standards, rooted in the most elementary maxim, "Do the right thing!" The Company's Code of Ethics is designed to deter inappropriate behavior and heighten awareness as to what is right, fair, just and good by promoting:

- ❖ Honest and ethical conduct.
- ❖ Full, fair and accurate disclosure.
- ❖ Compliance with applicable rules and regulations.
- ❖ Reporting of any violation of the Code.
- ❖ Accountability.

To help clients understand the Company's ethical culture and standards, how the Company controls sensitive information and what steps have been taken to prevent personnel from abusing their inside position, a copy of the Company's Code of Ethics is available for review upon request.

## Proxy Voting

The Company is hereby expressly precluded from voting proxies. Clients understand and agree that the client retains the right to vote all proxies, which are solicited for securities held in the managed accounts. Any proxy solicitations received at the Company's place of business will be immediately forwarded to the client for their evaluation and decision.

## INVESTMENT OR BROKERAGE DISCRETION

### Securities and Amount Bought or Sold

The Company executes an agreement with each client, which sets forth the authority to buy and sell securities in whatever amounts are determined to be appropriate for the account and whether such transactions are with, or without, prior approval by the client.

### Direction of Transactions and Commission Rates

The Company maintains a custodial relationship with Fidelity, Scottrade, and brokersXpress, NASD licensed broker/dealers (member NASD/SIPC). Managed accounts of the Company may be maintained at these custodians. Other custodians may also be used in order to obtain investments not readily available at Fidelity, Scottrade, or brokersXpress.

The Company has selected Fidelity, Scottrade, and brokersXpress as custodians of choice based on their firms commitment to serving investors, the vast investment choices offered, the quality of transaction executions, the personal touch provided, competitive transaction charges, the Company's familiarity with Fidelity Investments' and Scottrade's trading platforms, on-line services for account administration and operational support, and overall excellence as brokerage firms. However, we acknowledge that there may always be cheaper, faster, newer, better in some niche way broker/dealers available. Acknowledging this, we make the best decisions we can with the information we have in order to best manage our clients' money.

The Company is not a subsidiary of, or affiliated with Fidelity, Scottrade or brokersXpress in any manner. The Company has sole responsible for any investment advice rendered, and advisory services are provided separately and independently of the brokerage firm.

## ADDITIONAL COMPENSATION

### Financial Planning Economic Benefits & Conflicts

Clients are cautioned to consider their options carefully when Mr. Bryan K. Trochessett, or any future Investment Advisor Representatives of the Company, recommends the need for outside consultations and coordination (*e.g.*: attorneys, CPAs, insurance and securities representatives) to implement certain aspects of financial planning process. Even though Mr. Trochessett does not earn commissions for the sale or implementation of any financial products, nor share in any fees earned by attorneys when implementing an estate plan those person to which Mr. Trochessett refers business can. As a result this creates incentive on the

part of Mr. Trochessett and the Company to refer client business to only those persons that in turn refer potential clients to the Company. This can eliminate the possibility for the client to be referred to someone who may provide better services at lower cost. Consequently, the objectivity of the advice rendered by Mr. Trochessett could therefore be subjective and disadvantage client.

Therefore, to ensure clients understand the full relationship of Mr. Trochessett and the Company to any related persons and outside parties that Mr. Trochessett may refer business, as well as the choices and risks clients have in receiving investment and financial planning services, the following disclosures are provided:

- ❖ Clients may choose any broker-dealer to execute his/her securities transactions.
- ❖ Investments involve risk and some investment decisions will result in losses. Clients understand that the Company cannot guarantee that their investment objectives will be achieved by working with us.
- ❖ Clients are under no obligation to have any related person or outside party that the Company recommends prepare planning documents (i.e., estate, insurance, tax, etc...). Clients are free to choose who they want to implement any recommendations.
- ❖ The related persons and outside parties that the Company will have perform certain aspects of the financial planning services for the client will be registered representatives of a broker/dealer and/or licensed representatives of insurance companies – they will receive the normal commissions associated with such transactions.

Notwithstanding such potential conflicts of interest, the Company strives to serve your best interest; as well as, ensuring such disclosure is being properly made to you in compliance with the Investment Advisor Act of 1940, Rule 275.206.

END OF THE DISCLOSURE BROCHURE

