Form ADV Part 2A - Firm Brochure



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This Brochure provides information about the qualifications and business practices of Owl and Ore LLC, doing business as Owl and Ore Wealth Planning. If you have any questions about the contents of this Brochure, please contact us at 925-719-9297 or owlandore@owlandore.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 Owl and Ore LLC is available on the SEC's website at www.adviserinfo.sec.gov by searching by firm name or CRD #283734.

Owl and Ore LLC is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training.

Item 2 - Material Changes

Update of fee schedule and fee for service language.

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Item 4 – Advisory Business

Description of Advisory Firm

Owl and Ore LLC, doing business as Owl and Ore Wealth Planning, is an investment advisor conducting business in states where it is properly registered or qualifies for an available exemption to registration. The firm will be referred to as Owl and Ore Wealth Planning or 'the firm' throughout this brochure. However, it should be noted that the firm is incorporated as Owl and Ore LLC.

Owl and Ore LLC was formed in 2020, operating previously as Blue Sky Financial Group from 2016 to 2020. The firm has been registered as an Investment Advisor since June 2016**.**

Owl and Ore Wealth Planning is an independent financial planning and investment management firm. The firm provides personalized **Financial Planning Services**, which includes insurance planning and investment management to individuals, families and their related entities, trusts and estates, and small businesses. The firm works with clients to define financial objectives and to develop strategies for reaching those objectives, some of which may include; identification of financial problems, cash flow and budget management, insurance review, asset allocation analysis, investment management, education funding, retirement planning, estate planning, charitable giving, special needs planning, business succession issues, equity benefits and/or other issues specific to the client.

An evaluation of each client's initial situation is provided to the client, with the content defined by the scope of the engagement with the client. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. The firm offers to assist the client with implementing the recommendations by working directly with the client and/or the client's other advisors. More frequent reviews might occur in the early stages of the client relationship, depending upon the client's circumstances and the scope of the engagement.

When providing **Investment Advisory Services**, the firm will work with its clients to create an initial portfolio allocation designed to complement each client's financial objectives. The firm may create a portfolio, consisting of individual stocks or bonds, exchange trade funds, mutual funds, commodities, derivatives, money markets and cash.

The firm tailors its portfolio advice to the individual needs of the client(s), based on the financial goals the client(s) are trying to accomplish. Clients may impose restrictions on the securities, security types or certain industries/companies that the firm invests in in the client's account(s).

For investment management services, the firm prepares and reviews an investment proposal with the client. The firm implements the recommendations in the plan and provides ongoing investment management services. Assets under the direct management of the firm are held by independent custodians in the client's name. The firm places trades for clients and provides rebalancing services on the clients' behalf. The client receives periodic statements and trade confirmations directly from the custodian.

The firm may recommend other professionals (e.g., lawyers, accountants, trust officers, insurance agents, real estate agents, etc.) at the request of the client. Other professionals are engaged directly by the client on an as-needed basis even when recommended by the Advisor. Conflicts of interest will be disclosed to the client and managed in the best interest of the client.

The firm provides an initial consultation free of charge to prospects. The initial meeting provides the prospective client with the opportunity to interview the firm to determine if the services provided would be beneficial to their financial needs and concerns.

For clients and the general public (who chose to be part of a mailing list or social media group) the firm provides periodic newsletters and information, via email and social media, which provides insights to some of the key economic numbers and news articles highlighting the economic and financial events of the previous month. Associates of the firm may also contribute articles highlighting a concept of financial planning or a personal financial experience.

Client Assets Managed by Owl and Ore Wealth Planning

As of December 31st, 2025, the firm managed $57,315,785 in discretionary assets.

Item 5 – Fees and Compensation

Firm Engagement and Advisory Fees

The firm does not have an established asset minimum for client engagement. However, **the firm does generally charge a negotiable annual minimum fee of $7,000 for as long as the client maintains a relationship with the firm. This can consist solely of financial planning fees, or the financial planning fees can be offset by any investment advisory fees. If investment advisory fees can pay for the entirety of the annual minimum, financial planning fees may be waived.**

The firm also requires that clients participate in the firm's asset management model within one year of initial engagement to continue a service relationship. This involves moving any eligible accounts to a custodian where the servicing advisor can be listed as the advisor of record and granted limited power of attorney to act on behalf of the client to initiate trades, receive account documents and information, and deduct agreed upon fees from the managed accounts.

The firm believes that integrating financial planning with investment management allows the firm to coordinate the client's financial plan with the implementation and ongoing management of the client's investment portfolio. To properly manage clients' accounts, the firm reserves the right to provide financial planning services even if no planning fees are charged and only investment advisory fees are collected by the firm.

Clients maintain the right to implement the investment advice provided to them, or purchase investment products, at a custodian or broker/agent of their choice, independent of the firm's management services. While the client maintains this right, it may conflict with the firm's asset management model and could result in termination of the relationship.

Financial Planning Fees

Before assets are transferred to the firm's custodian and a firm advisor is listed as advisor of record, the firm charges a planning fee of **$584 per month or $3,500 semiannually** (the monthly fee is rounded up to the nearest dollar). This fee is intended to compensate the firm for the ongoing financial planning, analysis, implementation, account-transfer coordination, and other services performed before the client's assets are being transitioned to the firm. Collected monthly fees are charged in advance at the

beginning of each month. Semiannual fees are collected at the date the client agreement is signed and six months after.

The fees charged are not based upon a share of capital gains or capital appreciation of the funds or any portion of the funds of an advisory client. **The firm reserves the right to continue charging the planning fees until the applicable annual minimum is met through investment advisory fees. For example, if AUM fees are projected to only generate $5,000 in annual fees, the firm may, with the client's agreement, charge an additional $2,000 annually in planning fees. Initial starting planning fees and fee adjustments upon the initiation of asset management fees will be discussed and agreed to by the client and specified on the client agreement. Fees will be in force for six-month periods, and will be reviewed, changed or waived with the clients' agreement on each six-month anniversary.**

Fees are negotiable and the firm may, at its discretion, negotiate fees in certain circumstances, including based upon the size or complexity of the relationship, prior relationships, related account holdings, or other case-specific circumstances. The firm reserves the right to honor previous contracts and fee arrangements with existing clients. The fee schedule presented in this section is the maximum fee that may be charged for new relationships but does not imply that every new client pays that amount.

The firm recognizes that managing clients' accounts properly requires having an understanding the clients' goals, financial standing and other relevant financial variables. Therefore, even if a client does not pay a financial planning fee, the firm may provide some financial planning services at no charge.

Semi-Annual Planning Fee Credits for Investment Advisory Fees

Any Financial Planning fees paid in advance on a semiannual basis will be credited toward the client's Investment Advisory Fees following the transition to the Investment Advisory model. The credit will be calculated based on the difference between the original annual Financial Planning fee and the reduced annual Financial Planning fee agreed upon by the client and the firm. The resulting credit will be applied in equal monthly installments against the Investment Advisory Fee and will appear on the client's monthly invoice.

For example, if Investment Advisory Fees begin in month three and the client and firm agree to reduce the annual Financial Planning fee by $3,000 following the account(s) transition, the annual Financial Planning fee will decrease from $7,000 to $4,000. The original semiannual Financial Planning payment of

$3,500 would be reduced to $2,000, resulting in a $1,500 credit for the prepaid portion of the fee. This credit will be applied against the Investment Advisory Fee in equal monthly installments of $250 until the prepaid fee is exhausted.

Termination of Financial Planning Services

Either party may terminate the financial planning portion of the client agreement by providing written notice to the appropriate parties. Services will continue until the end of the termination month so that any final client offboarding tasks can be completed. The advisor will be available to the client to help with client side offboarding tasks. Upon termination, the client will be responsible for any planning fees earned through the effective date of termination. 1/6th of prepaid semiannual fee will be refunded for each of the remaining prepaid months after the termination letter is received.

Investment Advisory Fees for Assets Under Management (AUM Fees)

The firm charges an investment advisory fee for assets under management. Once client assets are transitioned to the firm, the ongoing AUM fee includes investment advisory services.

Clients pay a monthly account fee, in advance on the 1st of each month, based upon the market value of the household's total assets under management as of the last business day of the preceding calendar month. In computing the market value of assets, fund shares will be calculated at their respective net asset values as of the valuation date in accordance with each fund prospectus. Any such valuation shall not be deemed a guarantee of any kind with respect to the value of those assets.

The firm generally manages assets on a household basis, meaning that all the client accounts in which an advisor has LPOA may be aggregated for purposes of determining the applicable fee.

The following fee schedule represents the maximum standard annual investment advisory fees that may be charged based upon the amount of assets under management. The applicable fee is calculated using a tiered schedule, with each rate applied only to the portion of assets falling within the applicable tier.

Assets Under Management	Annual Fee on Assets Within Tier
$0 - $1,000,000	0.70%
$1,000,001 - $2,500,000	0.60%
$2,500,001 - $5,000,000	0.50%

$5,000,001 - $10,000,000	0.35%
$10,000,001 - $20,000,000	0.30%
$20,000,001 +	0.25%

For example, a household with $3,000,000 in assets under management would pay 0.70% on the first $1,000,000, 0.60% on the next $1,500,000, and 0.50% on the remaining $500,000.

The applicable annual fee is divided into twelve monthly installments and charged in advance at the beginning of each calendar month based upon the value of assets as of the last business day of the preceding calendar month.

Increases in account valuation resulting from client actions, including but not limited to account contributions, deposits, transfers, or rollovers, are included in the calculation of fees and may subject the account to a higher fee. Any decrease in account values, including distributions, will result in reduced fees during the next billing cycle.

Termination of Investment Advisory Services

Clients may terminate the investment advisory agreement in accordance with the terms of their client agreement. Upon termination of the investment advisory agreement, the firm will refund any unearned prepaid advisory fees, where applicable. The refund will be calculated by multiplying the monthly advisory fee by the number of calendar days remaining in the billing month after the effective termination date, divided by the total number of calendar days in that month. Fees earned through the effective termination date remain payable. The termination date is defined as the next business day following the day that a termination letter was received by the firm.

Additional Information Concerning Fees

The firm's fee structure is designed so that clients pay a planning fee during the initial implementation of the relationship. Once assets have been transferred to an agreed-upon custodian and the firm has been granted limited power of attorney over the accounts, investment advisory fees will begin and financial planning fees may be reduced or eliminated as agreed upon by the client and the advisor in the client agreement. The 1st of the month following the firm receiving LPOA powers is when AUM fees will begin and planning fees will be reduced or eliminated.

Fees are negotiable and the firm may, at its discretion, negotiate fees in certain circumstances, including based upon the size or complexity of the relationship, prior relationships, related account holdings, or other case-specific circumstances. The firm reserves the right to honor previous contracts and fee arrangements with existing clients. The fee schedule presented in this section is the maximum fee that may be charged for new relationships but does not imply that every new client pays that amount.

All fees paid for investment advisory services are separate and distinct from fees and expenses charged by the holding custodian or funds to their shareholders. These fees and expenses are described in each company's prospectus. The firm does not receive any portion of such commissions or fees from the custodian or client.

As stated previously, advisory fees are charged in advance at the beginning of each calendar month based upon the closing value of assets in the portfolio as of the last business day of the prior month.

Other firms and investment advisers may provide substantially similar services to those provided by the firm, and lower fees for comparable services may be available from other sources.

Method of Payment

Planning fees are billed directly to the client and may be paid by check, Automated Clearing House (ACH) instructions, or directly from an account managed by the firm, as permitted by applicable law.

Investment advisory fees are deducted directly from accounts under management by the advisor. Clients may authorize the firm to have one account pay the advisory fee attributable to other accounts, as permitted by applicable law.

Other Forms of Investment Compensation

Neither the firm nor any representative of the firm accepts compensation for the sale of securities or other investment products.

Item 6 – Performance-Based Fees and Side-By-Side Management

Item 6 of the Form ADV Part 2 instructions is not applicable to this Disclosure Brochure because the firm does not charge or accept performance-based fees which can be defined as fees based on a share of capital gains on or capital appreciation of the assets held within a client's account.

Item 7 – Types of Clients

The firm provides comprehensive financial planning for individuals and families, with a focus on equity income planning, retirement planning and legacy planning. The firm works with both high net worth and non-high net worth households.

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

Analysis is based on fundamental, technical, and cyclical analysis. The main sources of information include Morningstar reports, fund prospectuses, S&P reports, financial newspapers and magazines, white papers and research materials prepared by others, filings with the Securities and Exchange Commission, bond rating services, annual reports, and company press releases.

Investment Strategies

The primary investment strategy the firm uses for client accounts is strategic asset allocation, utilizing modern portfolio theory. The clients' goals, time horizon, as well as their particular risk tolerance and aversion to market volatility are the primary influence for the firm's portfolio recommendations.

The firm primarily uses passively managed exchange-traded funds and index funds. Depending on the size of the account and by client request, the firm will also utilize actively managed ETFs and mutual funds, individual stocks and bonds. Portfolios are globally diversified and use multi-asset classes to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon objectives, cash flow needs, risk tolerance, time horizon and tax situation stated by the client during consultations. The client may change these objectives at any time.

The firm's goal is to maintain long term 'buy and hold' investment strategy, but short-term changes can be made by client request or if a client changes the goals related to the funds.

In addition, short term changes may occur; if the manager of a fund changes, the fund strays from or changes their philosophy, or the position under performs relative to peer managers, a position may be sold. Additionally, tactical moves may require shorter holdings of a position given a unique situation.

Risk of Loss

All investment programs have certain risks that are borne by the investor. The firm's investment approach keeps the risk of loss in mind and tries to minimize raisk if possible. Of each type of investment the firm offers, the risks associated with each type of investment may include those listed below:

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them are large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, a significant increase in hedging activities by producers of gold or other precious metals and a significant change in the attitude of speculators and investors.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Stocks: Owning stocks refers to buying shares of equity in a company in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Bonds: Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities. The fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties.

Real Estate Funds (including Mutual Fund and ETF REITs): REITs face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in

governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Covered Call Options: Covered Call Options are contracts that are sold on an underlying security owned by the covered call writer. The contract allows the buyer to purchase the underlying security at a certain price at a certain time. Because the covered call writer agrees to sell the underlying security at the specified price covered call options carry the risk of missed gains if the underlying security increases above the specified contract price. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Put Options: A Put Option is a contract that gives the buyer the right (but not the obligation) to sell a particular underlying security (e.g. stock or ETF) at a predetermined price, which is known as the strike price or exercise price, within a specified window of time, or expiration date. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Non-U.S. Securities: Foreign securities carry certain risks such as currency fluctuation, political and economic change, social unrest, and changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Money Markets: A money market is a segment of the financial market in which financial instruments with high liquidity and very short maturities are traded. Money Markets usually produce a low rate or return exposing investors to inflation risk since the value of the investment may not outpace the rate of inflation.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9 – Disciplinary Information

This item is not applicable to this brochure because there are no legal or disciplinary events listed at Item 9 of the Form ADV Part 2 instructions that are material to a client's or prospective client's evaluation of this business or integrity.

Item 10 – Other Financial Industry Activities and Affiliations

The firm is not and does not have a related company that is a (1) 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), (2) futures commission merchant, commodity pool operator, or commodity trading advisor, (3) banking or thrift institution, (4) accountant or accounting firm, (5) lawyer or law firm, (6) pension consultant, (7) real estate broker or dealer, or (8) sponsor or syndicator of limited partnerships.

Other Registration Disclosures

No representative of the firm is registered as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

No representative of the firm recommends other investment advisors for clients and receives compensation therein.

Item 11 – Code of Ethics, Impartial Conduct Standard, Participation in Client Transactions and Personal Trading

Code of Ethics Summary

The firm has established a Code of Ethics that applies to all personnel. It is an investment advisor's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each client at all times. The firm has a fiduciary duty to all clients and conducts business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. The firm has the responsibility to make sure that the interests of all clients are placed ahead of the firm's and any supervised person's own investment interest. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to any services being conducted.

The firm and representatives of the firm must conduct business in an honest, ethical and fair manner and avoid all circumstances that might negatively affect or appear to affect the duty of complete loyalty to all clients.

The firm has a Code of Ethics disclosure brochure available with additional details. A copy of this disclosure is provided to all new clients. A copy of the firm's Code of Ethics will be provided to any client or prospective client upon request.

Department of Labor Impartial Conduct Standard

Owl and Ore Wealth Planning and its advisors operate as fiduciaries under the Employee Retirement Income Security Act (ERISA) and the 'Best Interest Standard' defined as a firm that *reflects the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims, based on the investment objectives, risk tolerance, financial circumstances, and needs of the Retirement Investor, and does not place the financial or other interest of the Investment Professional, Financial Institution or any affiliate, related entity or other party ahead of the interests of the Retirement Investor, or subordinate the Retirement Investor's interests to their own.*

The firm also conforms to the reasonable compensation standard, providing pricing options prudently designed to ensure that the Financial Institution and its Investment Professionals comply with the reasonable compensation standard in connection with covered fiduciary advice and transactions.

Personal Securities Transactions Disclosure

The personnel of the firm may buy or sell securities or have an interest or position in a security for their personal account(s) which are also recommended to clients. As these situations may represent a potential conflict of interest, the firm has developed several procedures designed to control for the conflict of interest.

Any person associated with the firm must be in compliance with The Insider Trading and Securities Fraud Enforcement Act of 1988. He/She cannot prefer their own interest to that of any advisory clients. He/She is not permitted to purchase or sell securities prior to a transaction or transactions being implemented for an advisory account (Front-Running). He/She may not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of their employment unless the information is also available to the investing public upon reasonable inquiry.

The firm maintains a list of holdings of all personnel associated with the firm. The list of holdings is available to clients upon request.

Item 12 – Brokerage Practices

The firm does not have any affiliation with product sales firms.

Client Directed Brokerage Arrangements

For clients that want to manage their accounts, the firm allows for client directed brokerage arrangements, which are arrangements where the client gets to pick the broker/dealer to use. For clients who choose client directed brokerage agreements, the firm is unable to achieve most favorable execution of client transactions. Client directed brokerage may cost clients commissions.

The firm reviews the execution of trades at each custodian regularly. Trading fees charged by the custodians are also reviewed on a regular basis. The firm does not receive any portion of the trading fees.

Specific custodian recommendations are made to clients based on their need for such services. The firm recommends custodians based on the proven integrity and financial responsibility of the firm, best execution of orders at reasonable commission rates, and the quality of the client service. The firm recommends discount brokerage firms and trust companies (qualified custodians).

The firm does not receive fees or commissions from any of these arrangements, although the firm may benefit from electronic delivery of client information, electronic trading platforms and other services provided by a custodian for the benefit of clients. In addition, the firm may also benefit from other 'soft dollar' services provided by a custodian, such as research, continuing education, discounts on software or other affinity programs, and practice management advice. These benefits are standard in a relationship with these custodians and are not in return for client recommendations or transactions.

Please note that the firm and its representatives do not have to produce or pay for the research, products and/or services provided by broker dealers or custodians for the use of their service. This may create a conflict of interest, as the firm may choose a broker-dealer or custodian based on the benefits of affiliation, rather than the client's interest in most favorable execution. It may also cause clients to pay commissions (or markups or markdowns) higher than those charged by other broker-dealers in return for the soft dollar benefits. Soft dollar benefits are used for all clients' and client accounts, not just those who pay for the benefits.

Aggregation of Client Orders-Block Trading Policy

The firm is to implement all client orders on an individual basis. Therefore, the firm does not aggregate or “block” client transactions. Considering the types of investments held in advisory client accounts, the firm does not believe clients are hindered in any way because accounts are traded individually. This is because the firm develops individualized investment strategies for clients and holdings will vary. Further, the investments the firm is responsible for trading in client accounts are typically limited to mutual funds, ETFs, and other broadly traded positions. The firm’s strategies are primarily developed for the long-term and minor differences in price execution are not material to the overall investment strategy.

Item 13 – Review of Accounts

Account Reviews and Financial Planning Review

All clients participate in the financial planning process, and the firm is proactive in meeting with clients on a regular basis, as deemed necessary to the client's goals. Clients may request reviews and can request a meeting at any time for any reason. At each review meeting clients are provided with an action list of tasks needed to maintain a satisfactory path to meet their financial goals. Meetings may also include a performance review of any accounts under the management of the firm. Annual performance reporting would also include any pertinent tax information. The client receives a written summary of the meeting discussion with action items and next steps after every meeting, regardless of its purpose or content.

Review Triggers

Account reviews can be done more frequently at the request of the firm when market conditions dictate, or when a client's investment objective changes or when the client experiences a life event. A review may also be triggered by a client request, changes in the tax laws, new information about an investment, political events, changes regarding the client's employer, or other important information.

Account reviews are conducted by Investment Advisor Representatives of the firm, and when applicable by the Chief Compliance Officer.

Item 14 – Client Referrals and Other Compensation

The firm loves receiving referrals from clients, friends and other professionals. Referrals are the lifeblood of the firm's growth.

The firm does not receive any compensation for these referrals and does not have any relation with an individual or organization where referrals are given for compensation.

Item 15 – Custody

The firm is not deemed to have custody of client funds because the firm does not deduct fees more than sixth months in advance. Fees are not deducted until the firm receives written authorization from the client to deduct advisory fees held with a qualified custodian.

Each time a fee is directly deducted from a client account, the investment advisor concurrently; sends the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and sends the client an invoice or statement itemizing the fee.

To mitigate any potential conflicts of interest, all client account assets are maintained with an independent qualified custodian, who provides account statements directly to clients at their address of record at least quarterly. Clients are encouraged to carefully review the statements provided by their custodians.

Clients are provided with account statements, net worth statements (personal balance sheets), and net worth graphs that are generated from the firm's financial planning or portfolio accounting software. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land, real estate, limited partnerships, outside businesses, and other hard-to-price assets. The net worth statements are used for long-term financial planning where the exact values of assets are not material to the financial planning tasks. The book values of hard to price assets are reviewed whenever supplemental information relating to valuation is received. Otherwise, these assets are priced at client cost. Clients are urged to compare the statements they receive from us to those they receive from their qualified custodians.

Item 16 – Investment Discretion

Through the firm's Portfolio Management services and upon receiving written authorization from a client, the firm will maintain trading authorization over client accounts. Trading authorization must be provided to us through the firm's agreement for services, usually through a written agreement with a custodian. The firm may implement trades on a discretionary basis (as provided by each client in the agreement for services). When discretionary authority is granted, the firm will have the authority to determine the type of securities and the number of securities that can be bought or sold for the client's portfolio without obtaining the client's consent for each transaction. However, the client will still be consulted before making significant changes in the account's holdings or risk profile even when discretionary trading authority is granted by the client.

If the client decides to grant trading authorization on a non-discretionary basis, the firm will contact the client prior to implementing changes in any account. If clients request that their accounts are managed on a non-discretionary basis, they will be made aware that if they are not able to be reached or are slow to respond to requests, it can have an adverse impact on the timing of trade implementations and may not achieve the optimal trading price.

All clients can place reasonable restrictions on the types of investments that may be purchased in an account. Clients may also place reasonable limitations on the discretionary power granted by the firm so long as the limitations are specifically set forth or included as an attachment to the client agreement.

Item 17 – Voting Client Securities

The firm will not vote proxies on behalf of client account. While there are some investment advisors that will vote proxies and other corporate decisions on behalf of their clients, the firm has determined that taking on the responsibility for voting client securities does not add enough value to the services provided to clients to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is the client's responsibility to vote all proxies for securities held in accounts managed by the firm.

Clients will receive proxies directly from their custodian or transfer agent and such documents will not be delivered by the firm. Although the firm does not vote client proxies, if there are questions about a particular proxy the client can contact the firm.

Item 18 – Financial Information

This item is not applicable to this brochure because the firm does not solicit prepayment of more than $1,200 in fees per client, six months or more in advance. The firm does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

The firm has not been the subject of a bankruptcy petition over the past ten years.

Item 19 – Requirements for State-Registered Advisers

Executive Officer and Management Personnel

Greg Gorski is sole management personnel. Refer to the next section for details regarding education and business background.

Other Business Activities

The firm and all personnel do not currently have any outside business activities.

No Performance Based

Fees, as previously disclosed in Item 6, the firm does not charge performance-based fees.

Arbitrations

The firm and all personnel have not been involved in an arbitration claim alleging damages of more than $2,500 resulting in an award or otherwise being found liable. The firm and all personnel have not been involved in a civil, self-regulatory organization, or administrative proceeding resulting in an award or otherwise being found liable.

Issuer of Securities

The firm and all personnel do not have relationships with any issuer of securities.

Business Continuity Plan

The firm maintains a written business continuity plan which is provided to new clients and is available on request by writing to the firm.

Outside Business Activity, Performance-Based Fees, Disciplinary Information, and Arrangements with Issuers of Securities

Pursuant to CCR Section 260.238(k), the firm must state that it has disclosed all material conflicts of interest relating to the firm, its representatives and employees that could be reasonably expected to impair the rendering of unbiased or objective advice. Please see Item 10 of this firm's Brochure for any other business in which representatives of the firm are actively engaged. Please note the firm does not

have any arrangements with any issuers of securities. As referenced in Item 6 above, the firm does not charge performance-based fees. The firm and management persons have not been involved in any arbitration awards, nor found liable by any civil or self-regulatory organization or in any administrative proceedings.