

## JEHM WEALTH & RETIREMENT, LLC

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FORM ADV PART 2A
FIRM BROCHURE
AUGUST 8, 2022

This brochure provides information about the qualifications and business practices JEHM Wealth & Retirement, LLC. If you have any question about the contents of this brochure, please contact us at (864) 527-0482. 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.

JEHM Wealth & Retirement, LLC is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about JEHM Wealth & Retirement, LLC is available on the SEC's website <a href="www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>. You can search this site by a unique identifying number, known as a CRD number. JEHM Wealth & Retirement, LLC's CRD number is 304253.

# Item 2 - Material Changes

We have one material change to report since our last annual update on February 25, 2022. Our fee schedule has been amended to include a fee range. Please see Item 5 below for the new fee schedule. We have no other material changes to report.

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## Item 4 – Advisory Business

## OWNERSHIP/ADVISORY HISTORY

JEHM Wealth & Retirement, LLC ("We") was established as a South Carolina Limited Liability Company in September 2016 and became registered as an investment adviser in August 2019. Prior to relocating and establishing JEHM Wealth & Retirement, LLC as a South Carolina Limited Liability Company, we operated under JEHM, LLC dba JEHM Wealth & Retirement Strategies which was founded in December 2012 as a Florida Limited Liability Company. Eric and Jennifer Lahaie are Managing Members with Jennifer Lahaie as our Chief Compliance Officer. Additional information about Eric and Jennifer Lahaie can be found under Item 19 along with their attached Supplemental Brochure.

## **ADVISORY SERVICES OFFERED**

#### FINANCIAL PLANNING SERVICES

#### **COMPREHENSIVE PLANNING**

Comprehensive financial planning services involve a review of your financial situation goals and risk tolerance. Our advice may cover any of the following topics:

## **Retirement Readiness:**

- SSI Analysis
- Pension Analysis
- Current Portfolio Analysis
  - Level of Market Risk
  - Diversification
  - o Fees
- Risk Tolerance
- Risk Capacity
- Tax return Diagnosis (Voluntary vs Mandatory)
- Existing Life Insurance & LTC Policy Review
- Existing Annuity Policy Review
- Beneficiary Review
- Personal Financial Website Access

## Portfolio Priorities:

- Level of Market Risk
- Diversification
- Fees
- Risk Tolerance risk Capacity
- Personal Financial Website Access

Through a series of personal interviews and/or the use of questionnaires we will collect pertinent data, identify goals, objectives, financial problems, and potential solutions. With this information, we tailor your financial plan and our advice to you. You will receive a written financial plan following the completion of our meetings.

#### **CONSULTING SERVICES**

Financial Consulting services are provided for specific areas of interest, such as:

- Investment Account Management/Monitoring
- Annuities
- Life Insurance

- LTC Risk Management
- Tax Efficiency Strategies
- Legacy Strategies
- Personal Financial Website Access

We meet with you to discuss your questions and conduct research to develop strategies based on desired goals and priorities that efficiently manage identified risks/challenges. We will present and discuss recommended strategies and potential alternative strategies as necessary. We work with you to create an action plan and complete any necessary paperwork to start the plan. This service generally does not involve creating a written financial plan.

#### PORTFOLIO MANAGEMENT SERVICES

We offer portfolio management services that involve assisting with the ongoing management of your investment accounts. We work with the client to formulate an individualized portfolio based upon your objectives, time frame, risk parameters and other investment considerations. Once we have this information, we generally create the client's portfolio on one of SEI Investment Management Corp.'s platforms ("SEI") (CRD# 105146).

SEI offers five platforms on which it acts as a subadvisor to us or co-advisor with us on behalf of your accounts: Private Client Strategies; SEI's Mutual Fund Portfolio; Separately Managed Account Program; ETF Strategies; and Income Strategies.

- 1) Private Client Strategies range from 100% fixed income through 100% equity. They are available in both Tax-Managed and Non-Tax-Managed versions. These strategies use SEIs ongoing capital market research for strategic asset allocation along with tactical management designed to respond to a wide range of market conditions more effectively than traditional asset allocation approaches.
- 2) SEI"s Mutual Fund Portfolios include Stability-Focused Strategies designed for investors with shorter time horizons who want to minimize downside risk and risk of loss while also mitigating overall portfolio volatility, and Growth-Focused Strategies designed for wealth accumulation that seek to provide returns above broad market indices with similar levels of risk. These are available in both Tax-Managed and Non-Tax-Managed versions.
- 3) SEI's Separately Managed Accounts Program is comprised of specialist money managers with expertise in specific investment styles. These accounts normally have a lower investment turnover. Depending on the client's risk tolerance or goals, the separate account allocation works within growth, stability and income phases. These are available in both Tax-Managed and Non-Tax-Managed versions. The Tax-Managed strategies employ tax-smart tactics like tax lot accounting, loss harvesting, and the transition of low-cost basis stock.
- 4) SEI's Tactical ETF Strategies involve ETF selection to match client risk tolerance and goals. SEI actively selects ETFs to gain exposure to attractive asset classes through changing market conditions. There are four core ETF strategies: (1) Tactical ETF Conservative Strategy; (2) Tactical ETF Moderate Strategy; (3) Tactical ETF Market Growth Strategy; (4) Tactical ETF Equity Strategy.
- 5) SEI's Income Strategies include Distribution-Focused Strategies and SEI Fixed Income Portfolio Management. SEI's Distribution-Focused Strategies are diversified mutual fund

strategies designed to provide predictable cash flow over a specific time horizon. They use dynamic asset allocation and can be customized to reflect risk tolerance, cash flow needs, inflation concerns, time horizon, and tax situation. They are designed to maintain distribution ranges from 4% to 8% and are available in both Tax Managed and Non-Tax-Managed versions. SEI's Fixed Income Portfolio Management is a program specializing in fixed-income solutions. It offers a range of options, through due diligence and asset management, and a fee-based, no-markup pricing approach.

Within its various platforms, SEI offers several risk-adjusted standard portfolios. In addition to these standard portfolios, we can create custom asset allocation portfolios designed to meet specific client needs. Such custom asset allocation portfolios may include assets which are not SEI proprietary funds or offerings.

When appropriate we may construct a limited purpose investment portfolio to give a client exposure to non-traditional asset classes which would not be held by SEI Private Trust Company.

## RECOMMENDATION AND MONITORING OF THIRD-PARTY INVESTMENT ADVISERS

We recommend and monitor third-party investment advisers ("Third-Party Adviser"). We may recommend one or more Third-Party Advisers to the client. The recommendation will depend on your circumstances, goals and objectives, strategy desired, account size, risk tolerance, or other factors. We work with you to determine which Third-Party Adviser may be appropriate. You are never obligated to use a recommended Third-Party Adviser.

We review the Third-Party Advisers prior to making a recommendation to you. We consider the following factors during its review: fees, reputation, performance, financial strength, management, price, reporting capabilities, your financial situation, goals, needs, and investment objectives. After our review, we present you with one or more recommendations.

If you wish to proceed with the recommendation, we enter a relationship with the recommended Third-Party Adviser. Under these arrangements, the Third-Party Adviser is responsible for portfolio management, best execution, portfolio reporting, trading, trade error resolution, and custodian reconciliations. We maintain our relationship with you by monitoring the status of your accounts with the Third-Party Adviser, making recommendation about the Third-Party Adviser, usually meeting with you either in person or by telephone on an annual basis and acting as your primary financial adviser. All questions regarding the Third-Party Adviser's services and performance should be directed to us.

When you are referred to Third-Party Advisers, you will receive full disclosure, including services rendered and fee schedules, at the time of the referral, by delivery of a copy of the relevant Third-Party Adviser's Form ADV Part 2A or equivalent disclosure document before receiving investment advisory services from the Third-Party Adviser. The Third-Party Adviser offers separate services that are outlined in its ADV Part 2A.

#### TAILORED SERVICES

The goals and objectives for each client are documented before any investing takes place. Clients may impose restrictions on investing in certain securities or types of securities.

#### Wrap Program

We do not sponsor a wrap program.

## **CLIENT ASSETS MANAGED**

As of January 1, 2022, we manage \$31,466,500 in client assets on a discretionary basis.

## Item 5 – Fees and Compensation

## **FINANCIAL PLANNING SERVICES**

#### **COMPREHENSIVE PLANNING SERVICES**

Comprehensive Planning Services are offered on a fixed fee basis that range from \$500 to \$5,000. The fixed fee varies depending on the nature and complexity of your individual circumstances and the number of areas covered by the written financial plan. Your Financial Planning Agreement will show what you will be charged to complete the Scope of Services as defined in the agreement. The fixed fee is negotiable. We will collect the first half of the agreed upon fees upon engagement and the second half at the delivery of the written financial plan.

## **CONSULTING SERVICES**

Consulting Services are provided on an hourly rate of \$150. At the beginning of engagement, we will provide you with a written estimate of the number of hours we believe the services will take. We collect the first half of the estimated fee upon engagement and the remaining balance at the final meeting. However, we track the time we spend collecting your information, analyzing and researching the chosen topics, and time presenting the findings to you. The final fee may be more or less than the estimate. We will present you with a final accounting of our time and the final fee.

You may cancel the Financial Planning Agreement for any reason during the first five (5) business days from the date of signing the agreement and will receive a 100% refund of all fees paid without cost of penalty. After the first five (5) business days you may cancel the agreement by giving ten (10) days written notice. To cancel the agreement, you must notify us in writing at JEHM Wealth & Retirement, LLC, 117 Woodruff Place Circle, Suite A, Simpsonville, SC 29681. Upon receipt of termination, you will receive a prorated refund of any unearned fees based on the percentage of work completed on the plan.

## PORTFOLIO MANAGEMENT AND RECOMMENDATION OF THIRD-PARTY INVESTMENT ADVISER

We charge an annual management fee based on a percentage of assets under management in your account. Our annual management fee is based on the following fee schedule:

<u>Custodian Reported</u> <u>Account Value</u>	Annual Management Fee
Up to \$1,000,000	1.00% - 1.50%
\$1,000,001 and Above	0.80% - 1.30%

The fee is negotiable at the firm's discretion. Our management fee is billed monthly, in arrears,

meaning that we collect the management fee at the end of the monthly billing period. The management fee will be based on the account value as of the last business day of the month as reported by the account's custodian. Our management fee does not include SEI's platform fee.

When we use the services of a Third-Party Adviser, our management fee will be collected by the Third-Party Adviser based on the Third-Party Adviser's collection schedule and then paid to us. The collection schedule will be disclosed in the investment management agreement and the Third-Party Adviser's ADV Part 2A.

Our fee is separate from the Third-Party Advisers fee and does not include brokerage commissions, transaction fees, and other related costs and expenses that are incurred by you. You may incur certain charges imposed by custodians, brokers, third-party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee and we will not receive any portion of these commissions, fees, and costs.

We will ask you to authorize us or the Third-Party Adviser with the ability to directly deduct the management fee from your account. Please see Item 15 for additional details.

## **TERMINATION OF SERVICES**

You may terminate this service for any reason within the first five (5) business days after signing the contract without any cost or penalty. Thereafter, the contract may be terminated at any time by giving ten (10) days written notice to JEHM Wealth & Retirement, LLC, 117 Woodruff Place Circle, Suite A, Simpsonville, SC 29681 or the client may contact the Third-Party Adviser directly at the address located on its ADV Part 2A and Investment Management Agreement. Upon written notice of termination, any prepaid fees will be prorated for the number of days those services were rendered based on the Account's custodian reported value as of the termination date.

## **OTHER SECURITIES COMPENSATION**

We do not receive any additional securities compensation. The item is not applicable.

## RETIREMENT ROLLOVER CONFLICTS OF INTEREST

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts of interest with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interests ahead of yours.

## Item 6 – Performance-Based Fees and Side by Side Management

We do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) or provide side by side management.

## Item 7 – Types of Clients

We offer our services to individuals and high net worth individuals. We require a \$50,000 minimum account size. This is waivable at our discretion.

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

#### METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

When we create your portfolio, we begin with an asset allocation based on your risk tolerance and financial goals. After the asset allocation is created, we rely upon fundamental and technical analysis investment strategies to monitor and review your portfolio.

Asset allocation is an investment strategy that aims to balance risk and reward by apportioning a portfolio's assets according to an individual's goals, risk tolerance and investment horizon. The asset classes typically include equities, fixed-income, international equity or fixed-income securities, and cash and equivalents and possibly alternative assets. The benefit of asset allocation is that each class has different levels of risk and return, so each will behave differently over time. The risk associated with asset allocation is that there is no guarantee that diversification among asset classes will grow a portfolio.

Fundamental analysis is a technique that attempts to determine a security's value by focusing on underlying factors that affect a company's actual business and its future prospects. The analysis is performed on historical and present data. On a broader scope, one can perform fundamental analysis on industries or the economy as a whole. The term refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements. The risk associated with fundamental analysis that despite that appearance that a security is undervalued, it may not rise in value as predicted.

Technical analysis is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. The risk associated with technical analysis is that there is no broad consensus among technical traders on the best method of identifying future price movements.

For recommendation of Third-Party Advisers, we attempt to match your individualized needs, goals and objectives with a Third-Party Adviser's method of investment analysis and investment strategies. Please refer to the Third-Party Adviser's ADV Part 2A – Item 8.A for a full description of the Third-Party Adviser's Methods of Analysis and Investment Strategies.

## **INVESTMENT RISKS**

All investment programs have certain risks that are borne by the client and <u>investing in securities</u> <u>involves risk of loss that clients should be prepared to bear</u>. Our goal is to reduce the risk of loss, but not at the expense of portfolio growth. The client should feel free to ask questions about risks that he or she does not understand; we would be pleased to discuss them.

#### **RECOMMENDED SECURITIES**

We use several types of securities in client portfolios including but not limited to exchange traded funds (ETFs). Some of the risks associated with these securities include:

- **Credit Risk:** This is the risk that an issuer of a bond could suffer an adverse change in financial condition that results in a payment default, security downgrade, or inability to meet a financial obligation.
- **Inflation Risk:** This is the risk that inflation will undermine the performance of an investment and/or the future purchasing power of a client's assets.
- Interest Rate Risk: The chance that bond prices overall will decline because of rising interest rates.
- International Investing Risk: Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition, foreign investments are subject to settlement practices, as well as regulatory and financial reporting standards, which differ from those of the U.S.
- Investment Style Risk: Different investment styles tend to shift in and out of favor, depending on market conditions and investor sentiment. Growth stocks tend to be more volatile than value stocks and their prices usually fluctuate more dramatically than the overall stock market. A stock with growth characteristics can have sharp price declines due to decreases in current or expected earnings and may lack dividends that can help cushion its share price in a declining market.
- Manager Risk: The chance that the proportions allocated to the various securities will cause the client's account to underperform relevant to benchmarks or other accounts with a similar investment objective.
- **Principal Risk**: There is no guarantee that a stock will go up in value. A stock's price fluctuates, which means a client could lose money by investing in an equity security.
- **Stock Market Risk:** The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.

## Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would-be material to your evaluation of each supervised person providing investment advice. We do not have information applicable to this item.

# Item 10 – Other Financial Industry Activities and Affiliations Broker Dealer Affiliation

We are not affiliated with a broker-dealer.

## **FUTURES/COMMODITIES FIRM AFFILIATION**

We are not affiliated with a futures or commodities broker.

#### OTHER INDUSTRY AFFILIATIONS

Our owners and associates are licensed insurance agents of JEHM Wealth & Retirement, LLC. They may recommend insurance products to you. This other business activity pays them commissions that are separate from the fees describe in Item 5, above. This is a conflict of interest because the commissions give them a financial incentive to recommend and sell insurance products to you. However, they attempt to mitigate any conflicts of interest to the best of their ability by placing your interests ahead of their own and through the implementation of policies and procedures that address the conflict. Additionally, you are informed that you always have the right to choose whether to act on the recommendation and the right to purchase recommended insurance through any licensed insurance agent or agency.

## RECOMMENDATION AND SELECTION OF THIRD-PARTY INVESTMENT ADVISERS

We recommend the services of third-party investment advisers. This information can be found under Items 4 and 5. We will ensure that the Third-Party Adviser is properly registered or exempt from registration in the client's state of residence prior to making any recommendation.

# Item 11 – Code of Ethics, Participation or Interest in Client Transaction and Personal Trading

## **DESCRIPTION**

Our Code of Ethics establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

Our Code of Ethics covers all supervised persons, and it describes our high standard of business conduct and fiduciary duty to our clients. The Code of Ethics includes, among other things, provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition on rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All supervised persons must acknowledge the terms of the Code of Ethics annually or as amended.

## MATERIAL INTEREST IN SECURITIES

We do not have a material interest in any securities.

#### INVESTING IN OR RECOMMENDING THE SAME SECURITIES

Our owner may buy or sell for his or her own account the same securities at or about the same time that he or she recommends those securities or purchase them for your accounts. A conflict of interest may exist because they can trade ahead of your trades. We mitigate any conflict of interests in two ways. First, our Code of Ethics requires employees to: report personal securities transactions on at least a quarterly basis and provide us with a detailed summary of certain holding (both initially upon commencement of employment and quarterly thereafter) in which

employees have a direct or indirect beneficial interest. The reports are reviewed to ensure that we do not trade ahead of your accounts. Second, we require your transactions be placed ahead of our associates' personal trades or our associates can place personal trades as part of a block trade (please see Item 12.B for details on our block trading practices). The records of all associates' personal and client trading activities are reviewed and made available to regulators to review on the premises.

## Item 12 – Brokerage Practices

## RECOMMENDATION CRITERIA

We currently recommend the clearing and custody services of SEI. Some of the primary considerations in determining reasonableness of commissions are: rates charged by other brokers that provide clearing or custody services for registered investment advisers; reputation and financial strength; breadth and depth of available products, with an important factor being the broker's non-transaction-fee mutual fund universe; accuracy with which transactions are processed; customer service responsiveness; availability of technology solutions interoperable with our systems and suitable for managing multiple accounts; as well as client satisfaction. We periodically evaluate the foregoing factors, and while we may conclude based on our review that commission rates paid by clients are reasonable, lower commissions may be available from other brokers or in conjunction with retail (non-advisory) accounts, and certain mutual funds that carry a transaction fee may be available on a no-transaction-fee basis form other brokers or directly from the fund company.

#### RESEARCH AND SOFT DOLLARS

"Soft dollars" are defined as a form of payment investment firms can use to pay for goods and services such as news subscriptions or research. When an investment firm gives its business to particular brokerage firm, the brokerage firm in return can agree to use some of its revenue to pay for these types of services. Our current custodian, SEI Private Trust Co, does cover the cost of our CRM subscription as a result of our IARs participating in a training class. This benefit is not related to client securities transactions.

#### **BROKERAGE FOR CLIENT REFERRALS**

We do not receive client referrals or any other incentive from any broker-dealer or custodian.

## **DIRECTED BROKERAGE**

We do not allow for directed brokerage.

## **TRADE AGGREGATION**

We may aggregate transactions (trades) in securities for you with other clients to improve the quality of execution. When transactions are so aggregated, the actual prices applicable to the aggregated transactions will be average, and your account will be deemed to have purchased or sold its proportionate share of the securities involved at the average price obtained. We may determine not to aggregate transactions, for example, based on the size of the trades, the number of client accounts, the timing of the trades, the liquidity of the securities and the discretionary nature of the trades. If we do not aggregate orders, some clients purchasing

securities around the same time may receive less favorable prices than other clients. This means that this practice of not aggregating may cost you more money.

## Item 13 – Review of Accounts

#### PERIODIC REVIEWS

Our owners meet with portfolio management and third-party investment adviser clients on a semi-annual basis. They also conduct monthly account performance reviews.

Our owners review financial plan on an annual basis and provide any necessary updates during a client review meeting.

## **OTHER REVIEWS**

Additional reviews are conducted periodically depending on market conditions, economic or political events, or by changes in a client's financial situation (such as retirement, termination of employment, physical move or inheritance).

#### **REPORTS**

Our financial planning clients will receive a written report. You will also receive at least quarterly account-statements from the account's custodian. We urge you to carefully review such statements.

## Item 14 – Client Referrals and Other Compensation

## **OTHER COMPENSATION**

We do not receive any other compensation.

## **CLIENT REFERRALS**

We do not pay for client referrals or use solicitors.

# Item 15 – Custody

All client funds, securities and accounts are held at SEI Private Trust Company or the custodian of the Third-Party Adviser. We do not take possession of a client's securities. You will receive at least quarterly account statements from the broker dealer, bank or other qualified custodian that holds and maintains your assets. We urge you to carefully review these statements.

## Item 16 – Investment Discretion

We offer discretionary management services. You must sign the investment management agreement to grant us discretionary power over your account. Our investment management agreement contains a limited power of attorney that allows us to select the security, the amount, and the time of the purchase or sale in your account. It also allows us to place each trade without your prior approval. In addition to our investment management agreement, your custodian may request that you sign the custodian's limited power of attorney. This varies with each custodian. We discuss all limited powers of attorney with you prior to their execution. In all cases, however,

our discretion will be exercised in a manner consistent with the stated investment objectives for your account and any other investment policies, limitations or restrictions.

When we recommend a Third-Party adviser, we do not manage your accounts on a discretionary or non-discretionary basis. The recommended Third-Party Advisers will have discretion over your account.

## Item 17 – Voting Client Securities

We do not vote proxy votes for any client. All proxy materials are mailed or emailed directly to the client from the account's custodian. Any proxy materials received by us will be forwarded to you for response and voting. In the event you have a question about a proxy solicitation, please feel free to contact us.

## Item 18 – Financial Information

## **BALANCE SHEET**

We do not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. Therefore, we are not required to provide a balance sheet.

## FINANCIAL CONDITION

We are required in this Item to provide you with certain financial information or disclosures about our financial condition if we have a financial commitment that impairs our ability to service you. We do not have a financial commitment that impairs our ability to service our clients.

#### **BANKRUPTCY**

We have not been the subject of a bankruptcy proceeding.

## Item 19 – Requirements for State-Registered Advisers

We have two principal executive officers, Eric Lahaie ("Mr. Lahaie") and Jennifer Lahaie ("Mrs. Lahaie"). Mr. and Mrs. Lahaie's biographical information is provided in the attached Brochure Supplements.

Mr. and Mrs. Lahaie are required to disclose additional information if they have other business activities. Both, Mr. and Mrs. Lahaie are independent insurance agents and may receive commissions for the sale of insurance products. Also, Mrs. Lahaie is president of Laurel Lake Homeowners Association. These activities and any conflicts of interest associated therewith are discussed in Item 10 of this brochure and their brochure supplement.

Mr. and Mrs. Lahaie are also required to disclose additional information if they receive performance-based fees, have any relationship or arrangement with an issuer of securities, or was ever found liable in an arbitration, civil, self-regulatory organization or administrative proceeding. They do not have any information to report on these topics because none of these apply to them.