# Shared Vision Wealth Group, LLC

Shared Vision Wrap Fee Program Brochure Form ADV: Part 2 A Appendix 1

This wrap fee program brochure provides information about the qualifications and business practices of Shared Vision Wealth Group, LLC ("Shared Vision"), an SEC registered investment advisory firm. Being registered is neither an endorsement nor an indication of expertise. If you have any questions about the contents of this brochure, please contact us at (206) 838-3680. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state's securities authority.

Additional information about Shared Vision also is available on the SEC's website at https://adviserinfo.sec.gov (under "investment adviser firm" and type in our Firm name).

We are a Registered Investment Adviser (RIA) Firm. Our registration as an RIA does not imply any level of skill or training. The oral and written communications we provide to you, including this brochure, are for you to evaluate us. Please use this information as factors in your decision to hire us or to continue our business relationship.

ITEM 1 – COVER PAGE

May 1, 2023

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# ITEM 2 – MATERIAL CHANGES

This brochure dated May 1, 2023 has been prepared by Shared Vision to meet SEC requirements. This brochure will be amended **anytime there** is a **material change** and this section will include a summary of any material changes.

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#### 4a: Services & Fees

Shared Vision was established in 2022 by Bradley Sayre, Carolina Ortiz, and Bryan Theall. Shared Vision became registered as an investment advisor in the State of California in 2023. Our main office is located in Carlsbad, California.

Shared Vision offers a wide range of investment advisory, planning and consulting services tailored to our clients' needs. For a description of all of these services, ask for a Shared Vision ADV Part 2A firm Brochure.

As Shared Vision is a new registered investment advisor, it does not have any reportable AUM.

# **Investment Management Services**

This brochure describes Shared Vision Wrap Fee Program. Shared Vision is the sponsor of the wrap fee program titled Shared Vision Wrap program. A wrap fee program allows our clients to pay a specified fee for investment advisory services and the execution of transactions. The advisory services may include portfolio management and/or advice concerning selection of other advisers, and the fee is not based directly upon transactions in their account.

The Shared Vision Wrap program is offered only through accounts held at our partner custodians. Shared Vision and the client will select a custodian and mutually agree on the investment strategy used by Shared Vision to manage the account. We will assist the client in determining their current financial situation, financial goals and attitudes toward risk, which will allow Shared Vision to implement appropriate asset allocations. We will continuously monitor client portfolios based on the individual needs of the client.

# **Investment Management Fees**

The program charges an asset-based fee for advisory services, which includes the cost of executing securities transactions. There is no separate charge for brokerage commissions; however, clients normally will be charged any mark-ups or mark-downs with respect to fixed income securities and other fees as described under 4c: Additional Fees.

We charge a fixed percentage of assets under management, a transaction fee or a flat fee. The maximum annual fee is 1.75%. Fees are negotiable. As a result, fees may range from no charge to the maximum annual fee of 1.75%.

Fees may differ based on a number of factors:

- Size of the relationship Larger accounts may receive more favorable pricing.
- Level of services needed Accounts requesting more services may have higher fees.
- Investment Strategy
- Trading activity and active portfolio management actively managed accounts generally have higher fees than fixed income accounts, buy and hold portfolios, and mutual fund or exchange traded fund accounts.
- Advisor expertise and experience

Although the firm's advisors may provide similar services, fees may differ from advisor to advisor. You may contact us at <a href="mailto:info@sharedvisionwealth.com">mailto:info@sharedvisionwealth.com</a> to request specific fee quotes for specific services from our investment advisor representatives.

Fee waivers or discounts which are not available to clients may be offered to Owners, Directors, Officers and Associated Persons of Shared Vision and our related as well as to family members and friends of associated persons of Shared Vision. It is important to note that it is possible that different investment advisor representatives may charge different asset management or account service fees or may waive certain custodian fees for providing the same types and level of service to clients. The specific level of services you will receive, and the asset management fees you will be charged will be specified in your investment advisory agreement

For purposes of determining value, securities and other instruments traded on a market for which actual transaction prices are publicly reported are valued at the last reported sale price on the principal market in which they are traded.

The fee includes the time and activities necessary to work with your attorney and/or accountant in reaching agreement on solutions, as well as assisting them in implementation of all appropriate documents. We are not responsible for attorney or accountant fees charged to you as a result of these activities.

Fees are paid quarterly in advance or arrears, as specified in the client contract. Either Shared Vision or our client may terminate the investment advisory relationship at any time for any reason. When an agreement is terminated, we will refund any pre-paid, unearned fees based on the number of days remaining in the quarter after termination. Refunds will be made in the month following the end of the quarter in which the contract was terminated.

When an agreement is terminated, we will no longer have access to your account. You will be responsible for paying all fees including full quarterly custodial administrative fees, account closure fees, mutual fund fees and all trading costs due to the termination. Custodian may assess additional fees for transfer of illiquid investments. If there is insufficient cash in the account, the liquidation of some securities may be used to pay the fees. Prior to termination of an agreement, we can provide a good-faith estimate of these fees.

Fees to outside portfolio managers may be included as part of the Shared Vision's fee outlined above with a portion of the fee charged going to the outside portfolio manager. The fee may also be charged in addition to Shared Vision fees outlined above. When the fee is charged separately, specific fees and other terms and conditions under which a client engages an outside portfolio manager will be set forth in a separate written agreement with the designated outside portfolio manager. Fees for outside portfolio managers range from

.2% to 1% of assets under management. Total fees will not exceed the industry standard of excessive fees which is 3%.

# Other Investment Compensation

Shared Vision does not accept commission for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

### **4b: Relative Cost of Services**

A wrap fee program allows our clients to pay a specified fee for investment advisory services and the execution of transactions. The advisory services may include portfolio management and/or advice concerning selection of other advisers, and the fee is not based directly upon transactions in your account. Your fee is bundled with our costs for executing transactions in your account(s). This may result in a higher advisory fee to you. We do not charge our clients higher advisory fees based on their trading activity, but you should be aware that we may have an incentive to limit our trading activities in your account(s) when we are charged for executed trades. By participating in a wrap fee program, you may end up paying more or less than you would through a non-wrap fee program where a lower advisory

fee is charged, but trade execution costs are passed directly through to you by the executing broker.

#### **4c: Additional Fees**

The program's quarterly fee does not include: (i) fees charged by outside portfolio managers (ii) annual account fees or other administrative fees, such as wire fees, charged by custodians; (iii) underwriting or dealer concessions or related compensation in connection with securities acquired in underwritten offerings; (iv) certain odd-lot differentials, transfer taxes, transaction fees mandated by the Securities Act of 1934, postage and handling fees, and charges imposed by law with regard to transaction in the client's account; and (v) advisory fees and expenses of mutual funds (including money market funds), ETFs, closed-end investment companies or other managed investments, if any are held in client's accounts.

When Shared Vision acts as the client's agent in purchasing securities (except in purchases in underwritten offerings other than for open-end mutual funds), the client should be aware that the quarterly fee does not cover certain cost associated with securities transactions in the over-the-counter market where Shared Vision must approach a dealer or market maker to purchase or sell the security. Such cost includes a mark- up, mark-down or spread and odd lot differentials or transfer taxes imposed by law. Because Shared Vision will be paying to the Custodian the transaction and execution costs of securities transactions a potential conflict of interest may arise creating a disincentive for Shared Vision to trade securities in client accounts.

# 4d: Referrals and Compensation

Our advisors receive a portion of the advisory fee that you pay us. This may create an incentive to recommend that you participate in a wrap fee program rather than a non-wrap fee program (where you would pay for trade execution costs) or brokerage account where commissions are charged. In some cases, our advisors may stand to earn more compensation from advisory fees paid to us through a wrap fee program arrangement than they might receive from a different advisory service.

### ITEM 5 – ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

Shared Vision caters primarily to affluent individuals and their retirement accounts, family offices and family investment vehicles who seek an approach to capital appreciation by investing in established stocks, exchange traded funds, mutual funds and fixed income. Shared Vision investment programs are also suitable for institutional investors such as pension and profit sharing plans, trust, estates and/or charitable

organizations and corporations. While there is no account minimum, Shared Vision may decline to accept accounts smaller than \$500,000.

Clients should carefully review the disclosure documents of outside portfolio managers and sub-advisers regarding account minimums and whether those account minimums are negotiable.

#### ITEM 6 - PORTFOLIO MANAGER SELECTION AND EVALUATION

# 6a: Selection of Managers

The specific terms and conditions under which a client engages an outside portfolio manager may be set forth in a separate written agreement with the designated outside portfolio manager. In addition to this brochure, clients may also receive the written disclosure documents of the respective outside portfolio manager engaged to manage their assets.

We select and review outside portfolio managers based on the following factors:

- Past performance;
- Investment philosophy and style;
- Market outlook;
- Experience of portfolio managers and executive team;
- Disciplinary, legal and regulatory histories of the firm and its associates; and
- Review of ADV, including conflicts of interest

We do not calculate portfolio manager performance. Instead, we rely upon the performance figures based on client's monthly or quarterly statements or reports provided to us by outside portfolio managers. As a result, performance information may not be calculated on a uniform and consistent basis. You should be aware that our firm cannot actively monitor outside portfolio managers conflicts of interest, daily trading activity and other operational issues.

Since our firm and its in-house professionals also act as portfolio managers, this may create a conflict of interest in that other investment advisory firms may charge the same or lower fees than our firm for similar services. Our related person portfolio managers are not subject to the same selection and review as outside portfolio managers that participate in the wrap fee program.

#### 6b: Related Persons

Shared Vision utilizes its in-house professionals to act as portfolio managers.

# **6c: Additional Information**

### Types of Advisory Services

Shared Vision offers investment advisory services tailored to our clients' needs.

### **Investment Management**

We provide a customized approach to investment management. Our process includes defining goals, assessing risk, developing a strategy, implementing the strategy, monitoring progress. We provide ongoing reporting that can be accessed via the internet or provided through monthly statements. We understand that every client has unique goals and risk tolerance and we design an investment strategy for those unique circumstances. These may include a traditional and time tested strategic asset allocation approach or new and innovative active asset allocation strategies or a mix of other strategies.

We understand the challenges employers face in providing retirement plan benefits (401k, Profit Sharing, SIMPLE, SEP, etc.) for employees. Our goal is to simplify our clients' lives through a responsive, integrated approach and deliver to you the level of service and expertise that you need, no matter the size or complexity.

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 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. As fiduciaries we are obligated to do the following:

- · Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

# Performance Based Fees and Side-by-Side Management

Shared Vision does not charge advisory fees on the performance of funds or securities in your account.

# Methods of Analysis, Investment Strategies and Risk of Loss

#### Strategies and Analysis

Shared Vision uses multiple strategies in order to best meet the diverse needs of our clients. We use multiple sources of information in performing our research, including sources such as reports and articles in financial media, financial magazines, research prepared by others, industry publications, corporate rating services, prospectuses, company press releases and annual reports and filings with the SEC. Shared Vision generally uses fundamental analysis to evaluate securities and market conditions. Fundamental analysis does not attempt to anticipate market movements. Using this method of analysis presents a potential risk as prices of securities can move up or down due to company-specific circumstances as well as in line with the overall market regardless of the economic factors considered in evaluation.

We believe it is important that each client know that our strategy is tailored to best meet their goals and needs. Each client presents a unique profile, and we may employ one or more strategies or methods to meet their goals.

# Modern Portfolio Theory

Shared Vision generally adheres to the principles of Modern Portfolio Theory, which advocates investing across different asset classes to increase diversity and reduce risk. Based on our research and the research of others, we will generally diversify your assets among cash equivalents (money market funds); high-quality, short- term bonds; large and small company stocks; and growth (higher-priced) and value (lower-priced) stocks in the U.S. and foreign developed markets. In certain circumstances, large, small, growth, and value stocks in select emerging markets and/or shares of real estate investment trusts (REITs) and commodity indexes will be included in diversified portfolios.

### **Asset Allocations**

Shared Vision recommends a mix of asset classes for your portfolio based on an assessment of your long-term financial objectives. Where appropriate, we will recommend an allocation to high-quality, short-term

bonds (within a broadly diversified index or asset class mutual fund) to reduce overall portfolio risk, generate a more predictable cash flow (interest income), facilitate portfolio rebalancing, and provide a hedge against inflation.

If your objective is a higher annual expected return and you are willing to accept a higher degree of risk, we will recommend a portfolio with greater allocations to stocks in general and small company and value stocks specifically (using index or asset class mutual funds). Recommended stock allocations will generally be globally diversified among the U.S. and foreign developed markets. In certain circumstances, we may include emerging markets and REITs in limited percentages. Our recommended asset allocation is not influenced by current market conditions. This asset allocation (which becomes your written "Investment Policy") is altered only when your long-term investment objectives have changed.

#### Rebalancing

Asset allocations for your portfolio will change as financial markets rise and fall and the specific assets of different parts of your portfolio change. This creates the opportunity to selectively rebalance your portfolio in order to bring asset class percentages back to your policy targets. Asset classes that have risen beyond predetermined limits are sold by an amount that brings the allocation back in line with policy targets, and those that have fallen in value are purchased in the same way. This is a method of buying low and selling high that is not based on trying to predict the direction of markets or asset returns.

This rebalancing has the effect of enhancing portfolio returns while maintaining the agreed-upon risk. In order to limit rebalancing transactions and the costs associated with buying and selling mutual funds through the chosen custodian, Shared Vision has pre-determined ranges in which allocations may vary and at which rebalancing is initiated.

### Specific Investments

While we generally select ETFs, mutual funds or similar securities, we may at times select individual securities for client portfolios. In these cases, Shared Vision examines each securities management, financial condition, and market position and ensures that any purchases of individual securities work towards the clients' portfolio goals, investment horizons and exposure to risk.

# **Investment Strategy Risks**

As recent global and domestic economic events have indicated, performance of any asset or asset class is not guaranteed, and can indeed be unpredictable. As a result, there is a risk of loss of the assets we manage as a result of both allocation and the status of the markets when we rebalance.

While all current research, academia and data allow us to understand and map asset classes and their risk and return, there is a risk that they, or our analysis, are wrong and will lead to losses. Additionally, correlations among asset classes may be judged incorrectly, which also may incur risk of loss as diversification may not be properly balanced. Additionally, minor or severe market conditions may significantly drive gains or losses in one assert class over another, causing unexpected losses. There is a risk that rebalancing at any moment in time will not match current market directions, leading to risk of loss.

### Risk of Loss

All investments include a risk of loss. In addition, as recent global and domestic economic events have indicated, performance of any investment is not guaranteed. As a result, there is a risk of loss of the assets we manage that may be out of our control. We use our best efforts as fiduciary to manage your assets. However, we cannot guarantee any level of performance or that you will not experience financial loss.

Shared Vision will use our best judgment and act as fiduciary in rendering services to you. We cannot warrant or guarantee any particular level of account performance, or that the account will be profitable over time. Not every investment decision or recommendation made by us will be profitable. You assume all market risk involved in the investment of account assets under the agreement and understand that investment decisions made for any accounts are subject to various market, currency, economic, political and business risks. Except as may otherwise be provided by law, we will not be liable to you for (a) any loss that you may suffer by reason of any investment decision made or other action taken or omitted in good faith by Shared Vision with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; (b) any loss arising from our adherence to your instructions; or (c) any act or failure to act by a custodian of your account. Nothing in this document shall relieve us from any responsibility or liability we may have under state or federal statutes.

# Sales Aggregation

We have adopted policies and procedures for aggregating and allocating client securities transactions. If each client participating in an aggregate order receives its full allocation, then each participating client generally receives the average price per share paid or received for the purchased or sold securities. If each client participating in an aggregated order receives less than its full allocation, then each participating client generally receives its pro rata share of the executed order.

# **Voting Client Securities**

Shared Vision does not vote proxy for any of its client. Each client is responsible for receiving and voting proxies for any and all securities maintained in their account. Clients may delegate proxy voting authority to a third-party representative (non-advisory personnel) by filing the appropriate custodial form(s). However, do not hesitate to contact us if you need any help or clarification regarding proxies.

# ITEM 7 – CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

Shared Vision will assist the client in determining their current financial situation, financial goals, reasonable restrictions and attitudes toward risk. The risk profile is used to help determine which portfolio manager(s) fits clients' investment needs. At least annually, Shared Vision will contact clients to determine whether they have had any changes to their profile. Should changes occur to a client's profile before the annual call or meeting, it is the client's responsibility to contact Shared Vision as soon as possible.

### ITEM 8 - CLIENT CONTACT WITH PORTFOLIO MANAGERS

Client access to Shared Vision portfolio managers is not restricted in any way.

#### ITEM 9 - ADDITIONAL INFORMATION

### 9.a: Disciplinary information

We do not have any legal, financial or other "disciplinary" items to report to you. We are obligated to disclose any disciplinary event that would be material to you when evaluating our Firm and its associated persons.

# 9.b: Broker Dealers, Registered Representatives and other Relationships Broker Dealers and Registered Representatives

Neither Shared Vision nor our employees hold any of the above registrations

**Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**Neither Shared Vision nor our employees hold any of the above registrations.

# Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Shared Vision does not accept commission for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

# Selection of Other Advisors and How this Adviser is Compensated for those Selections

Shared Vision may select outside portfolio managers or sub-advisors. We are not compensated for that selection. A portion of the fees you pay us may be used to compensate the outside portfolio manager or sub- advisor. The fees paid and parties involved are clearly set forth in the agreements between Shared Vision, our client and the outside portfolio manager or sub-advisor.

# 9c: Code of Ethics, Participation or Interest in Client Transactions

# Code of Ethics Description

We have adopted a Code of Ethics to which all investment advisor representatives and employees are bound to adhere. The key component of our Code of Ethics states that Shared Vision and its investment advisor representatives and employees shall always:

- Act with integrity, competence, dignity, and ethically when dealing with the public, clients, prospects, employers, and employees.
- Exercise its authority and responsibility for the benefit and interest of its clients first and to refrain from having
  outside interests that conflict with the interests of its clients. Shared Vision must avoid any circumstances that
  might adversely affect or appear to affect its duty of complete loyalty to its clients.
- Refrain from disclosing any nonpublic personal information about a client to any nonaffiliated third party
  unless the client expressly gives permission to Shared Vision to do so. All client information will otherwise be
  treated as confidential.
- Maintain the physical security of nonpublic information, including information stored on computers.

This Code of Ethics is in place to guide the personal conduct of our team and embodies our fiduciary duties and responsibilities to you and sets forth our practice of supervising the personal securities transactions of employees with prior or concurrent access to client trade information. A copy of the Shared Vision Code of Ethics is available, free of charge, upon request.

### Participation or Interest in Client Transactions

Shared Vision, or its employees, may buy and sell some of the same securities for our own accounts that we buy and sell for our clients. We will always buy or sell from our clients' accounts before we buy or sell from our accounts. In some cases Shared Vision, or its employees, may buy or sell securities for our own accounts and not for clients' accounts, as it may not meet the objectives or plans for the client. There are possible conflicts of interest, which our Code of Ethics addresses. We will always evaluate our activity from the view of our clients to ensure that any and all required disclosures are made. For example, we will disclose anything that would cause you to be unfairly influenced to make any decision regarding actions or inactions in your account.

We will not recommend securities or other investment products to our clients in which Shared Vision or any related person has an ownership or proprietary interest.

Shared Vision always tries to get the best price for the client. Shared Vision has in place internal controls and processes to allow contemporaneous trading (submitting Shared Vision or employee orders at the same time as client order) in block or aggregate trades. In other cases, except in the case of unaffiliated mutual funds, we will always trade individual securities in a client account before we trade Shared Vision or employee accounts.

### 9d: Review of Accounts

### Periodic Reviews

Accounts are reviewed by Bradley Sayre, CCO or qualified staff members. All reviews are either conducted or supervised by Bradley Sayre, CCO. The frequency of reviews is determined based on the client's investment objectives or plan, but no less than annually. More frequent reviews may also be triggered by a change in the client's

investment objectives; tax considerations; large deposits or withdrawals; large sales or purchases; loss of confidence in corporate management; or, changes in macro-economic climate.

# **Review Triggers**

More frequent reviews are triggered by a change in client's investment objectives; tax considerations; large deposits or withdrawals; large sales or purchases; loss of confidence in corporate management; or, changes in economic climate.

# **Regular Reports**

All investment advisory clients receive reports as needed, but no less than annually, on representative investments recommended specifically by the Shared Vision . Investment advisory clients also receive standard account statements from the custodian of their accounts on a monthly basis.

# 9.e: Client Referrals and Other Compensation

#### Economic Benefits Provided by Third Parties for Advice Rendered to Clients

Shared Vision participates in and may recommend to clients' broker-dealers for custody and brokerage services. Adviser may receive from broker-dealers certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment Advisers participating in the program.

The custodian may provide Additional Services to Adviser in its sole discretion and at its own expense, and Adviser does not pay any fees for the Additional Services. Adviser may have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Shared Vision participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Shared Vision by third party vendors.

Adviser's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to Adviser, custodian most likely considers the amount and profitability of the assets in, and trades placed for, Adviser's Client accounts. The custodian or broker dealer always has the right to terminate the Additional Services Addendum with Adviser, in its sole discretion, provided certain conditions are or are not met. Consequently, in order to continue to obtain the Additional Services, Adviser may have an incentive to recommend to its Clients that the assets under management by Adviser be held in custody with and to place transactions for Client accounts. Adviser's receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including seeking best execution of trades for Client accounts.

Broker-dealers may also have paid for business consulting and professional services received by Shared Vision 's related persons. Some of the products and services made available by broker-dealers through the program may benefit us but may not benefit our client accounts. These products or services may assist us in managing and administering client accounts, including accounts not maintained at the broker-dealer. Other services made available are intended to help us manage and further develop our business enterprise.

The benefits received by Shared Vision or our personnel through participation in the program does not depend on the amount of brokerage transactions directed. As part of our fiduciary duties to clients, Shared Vision endeavors at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by Shared Vision or our related persons in and of itself creates a potential conflict of interest and may indirectly influence the our choice of broker-dealer for custody and brokerage services.

Shared Vision will always act in accordance with all applicable federal and state regulations governing registered investment advisory practices.

#### Services that Benefit You.

You gain access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through some brokers include some to which might not otherwise be available or would require a significantly higher minimum initial investment by our clients.

### Services that May Not Directly Benefit You.

Other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both from the broker and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at the broker from which we received benefit. In addition to investment research, brokers may also make available software or other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts;
- assist with back-office functions, recordkeeping and client reporting;
- reports, publications and data on matters such as the economy, industries, sectors and individual companies or issuers, statistical information, account and law interpretations, technical market actions, credit analyses, risk management and analyses of corporate responsibility issues; and
- on-line news services and financial and market database services.

# Services that Generally Benefit Only Us.

Some services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events;
- seminars;
- technology, compliance, legal, marketing and business consulting and assistance;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

These services may come directly from a custodian/broker or in other cases, it will be arranged by third-party vendors. The broker may also discount or waive its fees for some of these services or pay all or a part of a third party's fees or us with other benefits such as occasional business entertainment of our personnel.

The availability of these services benefits us because we do not have to produce or purchase them, which may be a conflict of interest. We believe, however, that our selection of our custodians and brokers is in the best interests of

our clients. It is primarily supported by the scope, quality and price of services and not just those services that benefit only us. In cases where minimum asset balances are required, we believe we will have no difficulties maintaining minimum valuation in order to avoid paying service fees or that maintaining them presents a material conflict of interest.

#### **Charles Schwab**

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at Schwab. The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

# Your Custody and Brokerage Costs

To provide this wrap program, we are charged a percentage of the dollar amount of assets or a transaction fee per trade in the account in lieu of commissions. These rates may be determined by committing a certain value of assets at a particular custodian/broker. This commitment benefits you because the overall rates you pay may be lower than they would be if we had not made the commitment.

# Compensation to Non-Advisory Personnel for Client Referrals

Shared Vision does not compensate anyone for client referrals.

#### Custody

Qualified custodians, Schwab Institutional, Fidelity Investments and/or other custodians, hold clients' accounts. Shared Vision may have custody of Client assets (i) where we have authority to withdraw advisory fees advisory fees upon our instruction to the custodian and (ii) where we request Client funds to be disbursed pursuant to a standing letter of authorization. With the exception aforementioned custody, and other than to withdraw advisory fees or to disburse funds or securities pursuant to a standing letter of authorization, Shared Vision shall have no liability to the client for any loss or other harm to any property in the account, including any harm to any property in the account resulting from the insolvency of the custodian or any acts of the agents or associated persons of the custodian and whether or not the full amount or such loss is covered by the Securities Investor Protection Corporation ("SIPC") or any other insurance which may be carried by the custodian. The client understands that SIPC provides only limited protection for the loss of property held by a broker-dealer.

#### **Investment Discretion**

# Investment Management

Though our custodians, our clients provide signed permission to grant Shared Vision ongoing and continual discretionary access to their accounts. This discretionary authority allows us to manage your account

according to the investment strategies without calling you in advance of appropriate transactions. In the cases where we are not given discretion, we must receive permission from the client to make any trades on a non-discretionary basis.

# 9.f: Financial Information

We do not solicit prepayment of more than \$1,200, six or more months in advance.

Shared Vision, LLC is not currently experiencing, and does not currently anticipate, any financial condition that it believes is reasonably likely to impair its ability to meet contractual commitments to clients.

We have not been the subject of a bankruptcy petition in the last ten (10) years.