MOSS-ADAMS
WEALTH ADVISORS

Disclosure Documents and Privacy Policy

In Lieu of form ADV II
Pursuant to SEC Rule 206(4)-3
January 2010

Main Office:

999 Third Avenue, Suite 2800

Seattle, WA 98104

Phone: 206-302-6717

Please retain a copy of this brochure for your records

MOSS-ADAMS
WEALTH ADVISORS

ADDITIONAL BRANCH LOCATIONS

LOS ANGELES
11766 Wilshire Blvd., Ste. 900
Los Angeles, CA 90025
Phone: 310.481.1370

SANTA ROSA
3700 Old Redwood Hwy. Ste. 200
Santa Rosa, CA 95403
Phone: 707.535.4169

SACRAMENTO
3100 Zinfandel Drive, 5th Floor
Sacramento, CA 95670
Phone: 916.503.8100

SAN DIEGO
8889 Rio San Diego Drive, Ste 202
San Diego, CA 92108
Phone: 619.294.4800

PORTLAND
805 SW Broadway, Ste. 1200
Portland, OR 97205
Phone: 503.478.2295

EVERETT
2707 Colby Ave, Ste. 801
Everett, WA 98201
Phone: 425.259.7227

SPOKANE
601 W Riverside Ave, Ste. 1800
Spokane, WA 99201
Phone: 509.747.2600

TACOMA
1301 A Street, Ste. 600
Tacoma, WA 98402
Phone: 253.572.4100

YAKIMA
402 E. Yakima Ave, Ste. 110
Yakima, WA 98907
Phone: 509.248.7750

MOSS-ADAMS
WEALTH ADVISORS

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MOSS ADAMS
WEALTH ADVISORS

INTRODUCTION

Moss Adams Wealth Advisors LLC, an affiliate of Moss Adams LLP, is an independent investment advisory firm registered with the U.S. Securities and Exchange Commission (SEC) under the Investment Advisors Act of 1940. Moss Adams Wealth Advisors LLC has provided personal wealth management and financial planning services since 1988.

Moss Adams Wealth Advisors LLC is headquartered in Seattle, WA with offices throughout Washington, California and Oregon.

We provide a variety of services that are defined as:

- Investment Management and Consulting Services
- Personal Financial Planning
- Insurance Management and Consulting

This document is provided to prospective and existing clients as a means to facilitate a better understanding of our firm, our services and potential conflicts of interest that may arise. It should be reviewed in order to enable an informed choice by a client or potential client about selecting an advisory firm such as ours.

It should also be noted that separate and apart from their registration as Investment Advisor Representatives (IAR) of Moss Adams Wealth Advisors LLC, IAR's may also be Registered Representatives of Moss Adams Securities & Insurance LLC. Moss Adams Securities & Insurance LLC is a broker/dealer registered with the Financial Industry Regulatory Authority (FINRA).

Moss Adams Wealth Advisors LLC was formerly named Financial Security Group LLC.

OUR SERVICES AND FEES

OVERVIEW

Moss Adams Wealth Advisors LLC is an investment advisory firm providing Investment Management and Consulting Services, Personal Financial Planning Services, and Insurance Management and Consulting. Moss Adams Wealth Advisors LLC offers its services on a fee basis which may include fixed fees, hourly fees or fees based upon assets under management. Prior to engaging Moss Adams Wealth Advisors LLC to provide any of the foregoing services, the client will be required to enter into one or more written agreements setting the terms and conditions under which Moss Adams Wealth Advisors LLC shall render its services.

INVESTMENT MANAGEMENT SERVICES

Moss Adams Wealth Advisors LLC offers comprehensive wealth management services to help clients achieve their financial goals. This is done through a four step process integrating financial planning with investment management.

STEP 1: ORGANIZE.

We begin by consolidating all of your financial information, quantifying your goals, and developing a personal profile that establishes where you are now and the action steps necessary to reach your goals. The information we will gather includes, but is not limited to: your personal risk tolerance, marginal tax bracket, investment timeline, legal structure, and cash flow needs. Here are the steps we take during the organization phase:

- Complete detailed analysis of current position
- Establish clear and reasonable goals and objectives
- Translate objectives into qualitative and quantitative risk and return goals
- Determine time horizon
- Determine risk tolerance
- Assess cash flow needs
- Assess liquidity needs
- Consider liabilities
- Identify special circumstances or requirements
- Review performance objectives

Another important step in the process is the establishment of the client's familiarity with key assumptions such as inflation, and investment rates of return, and how these assumptions impact the results of our analysis. We may counsel the client as to the consistency of these assumptions with relevant historical data; however, we will not express any assurance as to the accuracy or reasonableness of any specific data and assumptions. Each client is ultimately responsible for the assumptions and personal data upon which our procedures and projections are based.

Clients provide relevant information, including their financial goals, a risk tolerance questionnaire, and other items that form the basis for our recommendations.

STEP 2: FORMALIZE

Formalizing your plan is an important next step. A well-written Investment Policy Statement is an essential roadmap for future investment decisions — one we review regularly and update as needed. The steps involved in formalizing this plan include:

- Determining strategic asset allocation model
- Determining rebalancing guidelines
- Determining manager structure and platform
- Developing strategies around:
  - Concentrated positions
  - Low basis legacy stock
  - Restricted securities
  - Stock options
  - Illiquid Investments
- Developing investment policy, spending policy and prepare Investment Policy Statement
- Documentation and support for the investment process

Clients are provided a written plan that includes certain projections. All such information and projections, and any related analyses, are intended exclusively for services provided by Moss Adams Wealth Advisors LLC. This financial information is not, and should not be considered, complete financial information for use by others. Because we are not an accounting firm, nor are we providing professional accounting services, this information and any analyses prepared by Moss Adams Wealth Advisors LLC cannot be used to obtain credit or for any purpose other than in connection with service performed by Moss Adams Wealth Advisors LLC. We do not audit (examine), review or compile financial statements or other such work as might be performed by an accounting firm. Further, it is likely that there will be differences between projected and actual results because events and circumstances frequently do not occur as expected and such differences may be material.

Moss Adams Wealth Advisors LLC may provide recommendations to clients regarding the use of programs offered by third party investment advisors/sponsors which provide individual portfolio advice through wrap fee and non-wrap fee programs, mutual fund/variable annuity allocation programs, model investment strategies and other types of investment advice. Moss Adams Wealth Advisors LLC may also assist clients in selecting individual portfolio managers through wrap fee programs and assist clients in selecting mutual funds, variable annuities or model portfolios or investment strategies in connection with certain other programs. Investment Advisor Representative's may utilize computer software programs provided by such third party investment advisors/sponsors in providing this advice to clients.

STEP 3: IMPLEMENT

The Investment Policy Statement (IPS) provides a logical guide for implementation of the investment strategy and serves as a reminder to the client of the goals, objectives, and design of their portfolio. The firm reviews, approves, and monitors the Investment Policy Statement as part of the firm's investment management services.

Moss Adams Wealth Advisors LLC may manage its clients' portfolios by allocating the portfolio assets among various money managers, internal private portfolio management or mutual funds on a discretionary or nondiscretionary basis using a common strategy which may result in similarly managed accounts. In so doing, Moss Adams Wealth Advisors LLC employs a consistent investment management strategy, whereby Moss Adams Wealth Advisors LLC shall exchange and/or transfer mutual funds among different asset categories based upon its strategic and tactical investment strategy.

Moss Adams Wealth Advisors LLC recommends third party advisors and programs based on research reports and analyses of performance provided by third party advisors. Publicly available research and reports regarding investment strategies and programs generally offered by a variety of third party investment advisors are also taken into consideration.

STEP 4: MONITOR

Investment professionals schedule client meetings on a periodic basis, or request basis, to review the following:

- Monitor economic and market environment
- Implement tactical allocation adjustments
- Monitor trading costs
- Monitor tax liability
- Monitor manager performance
- Review performance measurement and reporting procedures
- Consider changes in client circumstances
- Make program refinements as needed
- Confirm the client's Investment Policy Statement is consistent with the client's objectives and goals

Depending upon their needs, each client is encouraged to meet with their IAR either quarterly, semi-annually, or annually to review any changes that would affect the client's status, investment objective or risk tolerance. The client portfolio is rebalanced periodically to adhere to the current Investment Policy Statement. Moss Adams Wealth Advisors LLC follows the practice of diversification through asset classes to try to meet the optimal portfolio for the client.

Moss Adams Wealth Advisors LLC provides periodic investment management service reports to clients which include information about a client's financial situation, portfolio holdings, values and portfolio performance.

Clients may receive different levels of service (frequency of reviews, recognition of holidays and birthdays) based on factors considered by Moss Adams Wealth Advisors LLC. These factors include, but are not limited to: complications involved in managing a client's account, the client's level of sophistication, client preferences, and total assets under management.

FEES FOR INVESTMENT MANAGEMENT SERVICES – PRIVATE CLIENT

Moss Adams Wealth Advisors LLC provides investment supervisory services for private client portfolios on an individualized basis. Each portfolio is managed according to the clients' Investment Policy Statement.

Moss Adams Wealth Advisors LLC's asset management fees are based upon assets under management as follows:

ASSETS UNDER MANAGEMENT			
$2,000,000 and under			1.25%
$2,000,001	to	$5,000,000	0.75%
$5,000,001	to	$10,000,000	0.50%
$10,000,001	and above		0.25%

Fees on portfolios are calculated on a graduated basis, e.g., an account with a value of $3,000,000 will pay an annual fee of 1.25% on the first $2,000,000 and 0.75% on the asset value from $2,000,001 to $3,000,000.

FEES FOR INVESTMENT MANAGEMENT SERVICES – INSTITUTIONAL

Moss Adams Wealth Advisors LLC provides investment supervisory services for pension and profit sharing plans, tribal governments and enterprises, and charitable organizations and endowments. Asset management fees are based upon assets under management as follows:

ASSETS UNDER MANAGEMENT	
$10,000,000 and under	0.50%
Over $10 Million	0.25%

Fees on portfolios are calculated on a graduated basis, e.g., an account with a value of $13,000,000 will pay an annual fee of 0.50% on the first $10,000,000 and 0.25% on the asset value from $10,000,001 to $13,000,000.

Fees will be payable in arrears or advanced for each calendar quarter on a prorated basis. The fee will be a percentage of the market value of all assets in the account on the last trading day of each calendar quarter. This fee may be amended from time to time with affirmative written notice. Please refer to your Investment Advisory Agreement, including attached addendums and schedules to determine the manner in which your advisory fees will be calculated and billed. In any partial advisory fee cycle, your advisory fee will be pro-rated based on the number of days your assets are under management for the applicable period.

Certain clients may qualify as an "attest" or audit client for our affiliate company, Moss Adams LLP, and will therefore be billed based on a percentage of the market value of all assets in the account on the first trading day of each calendar quarter.

In some cases fees are adjusted to compensate for special circumstances and additional services provided. All fees and transaction costs charged by the custodian are not included in above fees. Third Party Money Managers provide investment management services for an additional fee. These fees vary based on such factors as the manager selected, underlying investment strategy and size of the account. If a Third Party Money Manager is used in your portfolio, a separate fee disclosure will be provided to you.

Client understands that investments in mutual funds or investment companies ("funds") will be included in calculating the value of the account for purposes of computing Moss Adams Wealth Advisors LLC fees and the same assets will also be subject to additional advisory and other fees and expenses, as set forth in the prospectuses of those funds, paid by the funds but ultimately borne by the investor. In addition, some funds held by the client when opening an account with Moss Adams Wealth Advisors LLC may have imposed an initial sales charge; you could still be subject to deferred sales charges (we do not participate in the sales charges charged by mutual funds). Similar investment advisory services may be available from other investment advisors for a lower fee,

Fees are prorated from the date of inception through the date of termination. For Moss Adams Wealth Advisors LLC managed accounts at Schwab and Fidelity, accounts will be prorated for each day of the current quarter until the date the written termination notice is effective. Either party may terminate the Investment Advisory Agreement at any time by providing written notice. The Client may terminate the Investment Advisory Agreement at any time with written notice to the advisor.

PRIVATE PORTFOLIO MANAGEMENT

Moss Adams Wealth Advisors LLC may internally manage its clients' portfolios by allocating the portfolio assets among the Private Portfolio Management Target Strategies. The following portfolio strategies are offered:

Target Fixed Income Strategies: The fixed income strategy has, as its primary objective, current income and capital preservation, with capital appreciation as a secondary objective. Customized target income strategies help clients achieve their cash flow and safety of capital goals as part of their overall financial plan. Our strategy to accomplish these goals is to select a diversified portfolio of highly rated income securities such as corporate bonds, government agency and US treasury notes, short term money market securities and cash, and tax-exempt municipal bonds. Our goal is to create flexibility and limit interest rate volatility by structuring a portfolio with laddered maturities.

One of the Target Fixed Income Strategies is called Short Term Income, a specialized strategy for investment funds that require short term liquidity. A different fee applies to this program than for other target income strategies.

Additional Customized Investment Services: Moss Adams Wealth Advisors LLC does provide other more customized strategies including a covered call writing strategy and a concentrated position collar hedging strategy.

FEES FOR PRIVATE PORTFOLIO MANAGEMENT

Private Portfolio Management services are provided for a fee that is in addition to our standard Investment Management Fee described above. These fees vary based on such factors as the underlying investment strategy and complexity of the services provided. If Private Portfolio Management is used in your portfolio, an additional schedule of fees (Schedule C in the Investment Advisory agreement) will be provided to you. The following fees are assessed as a percentage of the market value of all assets in the account:

1. Target Income Strategies 0.25%
2. Short Term Income 0.10%
3. Covered Call Writing 0.50%

Prime Brokerage Arrangements: For clients participating in Private Portfolio Management, Moss Adams Wealth Advisors LLC may use discretionary authority to trade away from your broker custodian when purchasing or selling fixed income securities. It is not used in all cases. Each trade placed at a broker other than your custodian has an additional cost which is charged by your custodian to settle the trade. This is in addition to any mark up or mark down that you may pay to the broker-dealer Moss Adams Wealth Advisors LLC selects to purchase or sell your security.

FEES AND CUSTODY

Fee schedules are periodically reviewed to be fair, current and competitive. Fees are generally non-negotiable unless specifically approved by management.

For multiple accounts under the control of the client, client's spouse, and relatives residing in the same household, accounts will generally be aggregated for fee purposes. The custodian holding the clients funds and securities will make payment of fees directly to Moss Adams Wealth Advisors LLC, unless otherwise directed.

PRICING

Proper valuations are necessary for accurate performance calculations and fee billing purposes, among others. Because of the many possible investments, various pricing services and sources and diverse characteristics of many investment vehicles, independent sources, periodic reviews and testing, exception reporting, and approvals and documentation or pricing changes are necessary with appropriate summary disclosures as to the firm's pricing policy and practices. Therefore, independent custodians of client accounts serve as the primary pricing source.

INVESTMENT CONSULTING SERVICES

Rather than managing any funds directly, Moss Adams Wealth Advisors LLC may act as the facilitator of the investment management process in accordance with the terms of an investment consulting services engagement letter, which sets forth the details of the actual services to be provided and the fees charged in connection with such services. Services may include:

- Development of mission statement and investment objectives
- Determination of risk tolerance levels and time horizons
- Review of cash flow and liquidity needs
- Development of a comprehensive Investment Policy Statement (IPS) that provides long term structure and guidance for investment decisions.
- Development of strategic asset allocation models, including rebalancing strategy
- Investment manager due diligence, fee negotiation, selection, monitoring and replacement recommendations
- Review of custodial platforms and expense controls
- Performance evaluation and benchmark review
- Development of strategies to address low cost basis stock, concentrated positions, and restricted assets
- Report education and fiduciary data to your plan trustees (Institutional clients)
- Inform and educate your plan participants (Institutional clients)

We cannot be responsible for the acts, omissions, or solvency of any broker, agent, or independent contractor or other advisor selected in good faith to take any action to negotiate or consummate a transaction for a consulting service we provide. Our services are not designed and should not be relied upon as a substitute for individual business judgment, nor are they meant to mitigate the necessity of personal review and analysis of a particular investment. Our services are designed to supplement a person's own planning analysis and aid them in fulfilling their personal and/or business financial goals and objectives.

Any analysis provided will rely upon individual representations and financial information regarding the client's existing investments. It will not express any form of assurance on the achievability of the projections or reasonableness of the underlying performance or assumptions. The client is responsible for providing current and accurate financial information and communicating to us any significant information that might affect the ultimate realization of the projected results. All reports, financial statement projections and analyses are intended exclusively for use in developing and implementing the above mentioned engagement. Accordingly, such reports may not be used to obtain credit or for any other such purpose. We will not compile, review or audit such statements and we will not express our opinion or other forms of assurance on them, including the reasonableness of assumptions and other data on which any prospective financial statements are based.

In addition, these services are not designed to discover fraud, irregularities or misrepresentations made in materials provided to us concerning potential investments or insurance coverage.

FEES FOR INVESTMENT CONSULTING SERVICES - HOURLY & PROJECT CONSULTING

Clients may retain Moss Adams Wealth Advisors LLC to provide financial consulting services for an hourly fee generally ranging from $100 to $500 per hour, depending on the complexity and risk of the service. Fees may also be set on a project basis. The actual consulting services to be performed and an estimate of the total fee will typically be set forth in a written service agreement with the client. The actual fee charged may be higher than this estimate. The client will typically be billed for the total fee after the services are rendered and the total is due upon receipt of the bill by the client. In certain circumstances, a portion of the entire fee may be collected in advance.

PERSONAL FINANCIAL PLANNING

Moss Adams Wealth Advisors LLC provides personal financial planning in accordance with the terms of a personal financial planning engagement letter, which sets forth the details of the actual services to be provided and the fees charged in connection with such services.

PERSONAL FINANCIAL PLANNING PROCESS

The personal financial plan begins by establishing and defining the relationship between Moss Adams Wealth Advisors LLC and the client. Upon acceptance of the relationship, all relevant client data is gathered and client goals and assumptions are determined. Moss Adams Wealth Advisors LLC will analyze and evaluate the client's current financial status, then develop and present to the client written recommendations explaining the impact these recommendations will have on the ability of the client to meet their goals and objectives. The client will have the ability to accept, reject or modify the recommendations as presented. The client can hire Moss Adams Wealth Advisors LLC to implement and monitor the recommendations as presented under a separate engagement.

The Personal Financial Plan will not express any form of assurance on the achievability of the projections or reasonableness of the underlying assumptions. Each individual is responsible for providing current and accurate financial information and communicating to us any significant information that might affect the ultimate realization of the projected results. All reports, financial statement projections and analyses are intended exclusively for use in developing and implementing the financial plan. Accordingly, such reports may not be used to obtain credit or for any purpose other than developing the personal financial plan. We will not compile, review or audit such statements and we will not express our opinion or other forms of assurance on them, including the reasonableness of assumptions and other data on which any prospective financial statements are based. It is likely that there will be differences between projected and actual results because events and circumstances frequently do not occur as projected and such differences may be material.

The suggestions and recommendations included in a financial plan will be advisory in nature, and we cannot guarantee the performance of any investment or insurance product which may be purchased to implement recommendations in a plan. The plan will include financial projections based on assumptions about future events and we cannot vouch for the achievability of such projections as the assumptions about future events may not be accurate. The assumptions are made with the agreement that they are sound and reasonable.

Investment recommendations developed as part of the financial plan should be implemented by registered investment advisors or other properly licensed investment professionals. We are not responsible for the success or failure of any specific investment or investment strategy recommended by other advisors.

Clients who receive personal financial planning services also have the option, under a separate engagement, to hire Moss Adams Wealth Advisors LLC for investment management services or purchase securities and insurance products offered through Moss Adams Securities & Insurance LLC. It is agreed and understood that Moss Adams Wealth Advisors will accept or receive fees, commissions, or other remuneration or compensation as the investment advisor or from originators, sponsors, syndicates, or distributors of investment or insurance products purchased by a plan recipient, if so engaged.

Clients are under no obligation to act upon the written recommendations; however, if they do act on any of the recommendations, the client is under no obligation to purchase products recommended through Moss Adams Wealth Advisors LLC.

FEES FOR PERSONAL FINANCIAL PLANNING

Fees for personal financial planning services will be based on the criteria listed below and will be fully disclosed in the separate personal financial planning engagement letter that the client will sign and agree to. Monitoring and future plan updates are separate engagements and will be billed separately.

Personal financial plan costs are broken down by engagement:

- A new planning client or groups from 1-4 employees will be charged a minimum planning fee of $2,500.
- An existing client with assets under management is able to receive a financial plan for no additional cost.
- A new planning client who allows us to manage their assets immediately following the delivery of their financial plan will have their planning fee waived.
- Group planning fees between 5 and 10 employees will received discounted plan fees of $2,000 each and group plans larger than 10 employees are customized and the fee may vary due to complexity but will generally not fall below the $2,000 per plan fee amount.

INSURANCE MANAGEMENT AND CONSULTING

Moss Adams Wealth Advisors LLC, in conjunction with its affiliate, Moss Adams Securities & Insurance LLC, may be engaged to provide a review of the current life, disability, annuity, life settlement and/or Long Term Care insurance for clients. In this review, the licensed IAR may suggest insurance products, if the licensed IAR feels the product would be in the best interest of the client. Moss Adams Wealth Advisors LLC may also be engaged on a consulting basis by clients to provide reviews, analysis and recommendations for insurance, including Life, Disability, Long Term Care, Life Settlements and Annuities (excluding health insurance). During the recommendation phase of the engagement, the licensed IAR may suggest alternative solutions for insurance currently owned by the client.

Clients may also retain Moss Adams Wealth Advisors LLC to provide an analysis of client's insurance needs and policies known as an Insurance Performance Evaluation, provided this analysis is not prohibited by state statute. The Performance Evaluation is a client-driven process focused on evaluating the performance of Client's life insurance policy to determine whether the current policy is performing based on original premium outlay and planning expectations and evaluating whether the market has a product to offer the client that better suits their needs. This analysis will be done at no cost to the client if so prohibited, and implementation of recommended solution is facilitated outside of Moss Adams Securities & Insurance LLC. If provided for by state statue, the advisor may receive commissions in lieu of fees, paid directly by a third party.

Licensed Investment Advisor Representatives typically receive commissions as registered broker/dealer representatives or insurance agents in connection with such transactions. The licensed Investment Advisor Representative may have a conflict of interest when recommending insurance products or certain insurance sub-account securities because they may receive additional compensation, on behalf of the firm, if the client chooses to execute transactions through them in their capacity as broker/dealer representatives or insurance agents as a result of such services. This commission is paid directly to the firm, not the Registered Representative. This financial incentive to execute a transaction creates a conflict of interest between Moss Adams Wealth Advisors LLC and the client.

FEES FOR INSURANCE MANAGEMENT AND CONSULTING

Clients may retain Moss Adams Wealth Advisors LLC to provide Insurance Management and Consulting for an hourly fee generally ranging from $100 to $500 per hour, depending on the complexity and risk of the service (if not prohibited by state stature). Fees may also be set on a project basis. The actual consulting services to be performed and an estimate of the total fee will typically be set forth in a written service agreement with the client. The actual fee charged may be higher than this estimate. The client will typically be billed for the total fee after the services are rendered and the total is due upon receipt of the bill by the client. In certain circumstances, a portion of the entire fee may be collected in advance.

Fees for this service will not be charged if the client retains a licensed Registered Representative of our affiliate broker/dealer, Moss Adams Securities & Insurance LLC, to complete a placement of an insurance product. In such cases, commissions may be received in lieu of fees, paid directly by the third party. Any and all commissions received are payable through the separate broker/dealer entity, Moss Adams Securities & Insurance LLC.

TERMINATION

Agreements for any of the above-referenced services provided by Moss Adams Wealth Advisors LLC may be terminated by either party by written notice to the other. Termination will only take effect upon the receipt of written termination instruction at Moss Adams Wealth Advisors LLC's corporate offices, located at 999 Third Avenue, Suite 2800, Seattle, WA 98104. Termination of this Agreement will not affect (i) the validity of any action previously taken by Moss Adams Wealth Advisors LLC or its affiliates under this Agreement; (ii) liabilities or obligations of the parties from transactions initiated before termination of this Agreement; or (iii) Client's obligation to pay fees (pro rated through the date of termination).

TYPES OF CLIENTS

Moss Adams Wealth Advisors LLC will generally provide investment advice to high net worth individuals, individual pension and profit sharing plans, trusts, estates or Not-For-Profit charitable organizations, corporations or business entities and Tribal government enterprises.

TYPES OF INVESTMENTS

Moss Adams Wealth Advisors LLC offers advice on a wide spectrum of investments and investment programs, including short term money market securities; corporate, municipal and US government fixed income securities; exchange listed, over-the-counter and foreign equities; investment company securities such as mutual funds and variable life insurance and annuities; derivative securities such as warrants and options; and direct participation partnerships. Investments such as commodities and futures contracts will be provided as part of a mutual fund.

Moss Adams Wealth Advisors LLC may recommend that "accredited investors" as defined under Rule 501 of the Securities Act of 1933, as amended, invest in private placement securities, which may include debt, equity, and/or pooled investment vehicles when consistent with the client's investment objectives.

Moss Adams Wealth Advisors LLC may also provide advice about any type of preexisting investment held in a client's portfolio when opening an account with Moss Adams Wealth Advisors LLC.

METHODS OF ANALYSIS, SOURCES OF INFORMATION AND INVESTMENT STRATEGIES

Moss Adams Wealth Advisors LLC utilizes a variety of resources to conduct an analysis for the investment strategies particular to our clients. These include, but are not limited to:

- Fundamental and technical analysis including charting as well as some cyclical weighting based on macroeconomic analysis
- Financial newspapers and magazines
- Research services prepared by others, such as Schwab Institutional, Fidelity Investments, Morningstar® and Fiduciary 360™
- Corporate rating services
- Commercially available services regarding investments and taxation of investments
- Annual reports, prospectuses, filings with the SEC
- Company press releases
- Internal analysis and research

With respect to the purchase or sale of securities, Moss Adams Wealth Advisors LLC's investment approach is long term in focus and centered on asset allocation and Modern Portfolio Theory. Securities purchases are generally made with the intent that they will be held long term. We may employ short sales, margin and options transactions as appropriate to the client.

EDUCATION AND BUSINESS STANDARDS

Investment Advisor Representatives of Moss Adams Wealth Advisors LLC are required to have a bachelor degree or at least two years of investment or financial planning related experience. Attaining advanced designations are encouraged of all Investment Advisor Representatives.

EDUCATION AND BUSINESS BACKGROUND

WASHINGTON

EVERETT

Ryan Blume

- Born: Seattle, WA, 1975
- Bachelor of Arts degree in Accounting, Magna Cum Laude from Western Washington University
- CERTIFIED FINANCIAL PLANNER™ Practitioner
- American Institute of Certified Public Accountants' Personal Financial Specialist designation
- Has worked in the areas of finance, tax and personal wealth planning since 1998

Lars Landrie, Partner

- Born: Columbus, MT, 1959
- Bachelor of Science degree in Finance from Central Washington University
- CERTIFIED FINANCIAL PLANNER™ Practitioner
- Has worked in the financial services industry since 1989

SEATTLE

Erica Coogan, Partner

- Born: Seattle, WA, 1976
- Bachelor of Arts degree in Communication, Magna Cum Laude from the University of Arizona
- CERTIFIED FINANCIAL PLANNER™ Practitioner
- Certified Fund Specialist
- Has worked in the financial services industry since 1998

Gidget Furness

- Born: Tucson, AZ, 1974
- Bachelor of Arts degree in Social Sciences, Magna Cum Laude from Washington State University
- Investment Adviser Certified Compliance Professional℠ (IACCP℠)
- Has worked in the financial services industry since 1995
- Ms. Furness serves as Chief Compliance Officer for the firm

Kathryn Haggitt Garrison

- Born: Memphis, TN, 1968
- Bachelor of Arts degree in American Studies, Stanford University
- Post Graduate studies, Southern Studies, University of Mississippi
- CERTIFIED FINANCIAL PLANNER™ Practitioner
- Has worked in the financial services industry since 1995

Aaron McFarland

- Born: Bellevue, WA, 1982
- Bachelor of Science Degree, Finance, Linfield College
- ACCREDITED INVESTMENT FIDUCIARY™ designee
- Has worked in the areas of finance and personal wealth planning since 2005

Rebecca Pomering, Partner

- Born: Normal, IL, 1974
- Bachelor of Science Degree, Finance, University of Illinois
- Senior Professional of Human Resources (SPHR)
- Has worked in the financial and accounting services industry since 1996
- Ms. Pomering serves as Chief Executive Officer for the firm

George Taylor

- Born, Spokane, WA, 1957
- Bachelor of Arts degree, Business Administration and Finance, University of Washington
- Has worked in the financial services industry since 1983

Marie Taylor

- Born: Seattle, WA,1956
- Bachelor of Science degree, University of Washington
- Has worked in the financial services industry since 1980

TACOMA

Justin Fisher

- Born: Tacoma, WA, 1979
- Bachelor of Science, Business Management, United States Air Force Academy
- Master of Business Administration, Portfolio Theory & Financial Analysis, University of Washington - Tacoma
- Has worked in the financial and accounting services industry since 2006

YAKIMA

Ryan Franklin

- Born: Richland, WA, 1975
- Bachelor of Arts in Business Administration with an emphasis in Accounting from Washington State University
- CERTIFIED FINANCIAL PLANNER™ practitioner
- Has worked in the areas of finance, tax and personal wealth planning since 1998

SPOKANE

David Green, Partner

- Born: Vicksburg, MS, 1957
- Bachelor of Science in Foreign Service degree in International Economics from Georgetown University
- Juris Doctor degree, Case Western Reserve University School of Law
- Master of Laws in Taxation degree, with Distinction, from the Georgetown University Law Center
- American Institute of Certified Public Accountants' Personal Financial Specialist designation
- CERTIFIED FINANCIAL PLANNER™ practitioner
- Licensed as a certified public accountant in California, Montana, Ohio, Oregon, Pennsylvania, Washington and Wyoming and has practice privileges in Idaho
- Has worked in the areas of finance, tax and personal wealth planning since 1982

OREGON

PORTLAND / VANCOUVER

Heather Kinney

- Born: Lincoln City, OR, 1983
- Bachelor of Science Degree in Business from Western Oregon University
- CERTIFIED FINANCIAL PLANNER™ Practitioner
- ACCREDITED INVESTMENT FIDUCIARY™ designee
- Has worked in the areas of finance and personal wealth planning since 2006

CALIFORNIA

SANTA ROSA

John Whiting, Partner

- Born: San Mateo, CA, 1958
- Bachelor of Sciences degree in Business Administration from California State University at Humboldt
- CERTIFIED FINANCIAL PLANNER™ practitioner
- ACCREDITED INVESTMENT FIDUCIARY™ designee

- Has worked in the financial services industry 1998.

Wes Read

- Born: Payson, UT,1978
- Bachelor of Science, Accounting, with minors in Information Systems and Political Science, Brigham Young University
- Master of Accounting, Brigham Young University
- CERTIFIED FINANCIAL PLANNER™ Practitioner
- CERTIFIED PUBLIC ACCOUNTANT
- Has worked in the areas of finance, tax and personal wealth planning since 2005

CALIFORNIA CENTRAL VALLEY

Michael Altobell

- Born: San Jose, CA, 1972
- Bachelor of Science degree in Business Administration from St. Mary's College of California, Moraga
- CERTIFIED FINANCIAL PLANNER™ practitioner
- Has worked in the financial and insurance services industry since 1994

LOS ANGELES

Aimee Kwain

- Born: Sault Ste. Marie, Ontario, Canada 1972
- Bachelor of Arts, Sociology and Criminology, University of Toronto with Honors
- Juris Doctor, Southwestern University School of Law, Los Angeles
- Has worked in the financial and insurance services industry since 2002

Thomas Imhof

- Born: Los Angeles, CA, 1970
- Bachelor of Sciences degree in Business Administration from California State University at Northridge
- CERTIFIED FINANCIAL PLANNER™ practitioner
- He has worked in the financial services industry since 1995

Anneliese Johnson

- Born: Los Angeles, CA, 1973
- Bachelor of Arts degree in Psychology from Pepperdine University
- Accredited Asset Management Specialist℠
- ACCREDITED INVESTMENT FIDUCIARY™ designee
- Has worked in the financial services industry since 1996

Jason Romano, Partner

- Born: Detroit, MI, 1971
- Bachelor of Arts degree in Psychology from University of California, Los Angeles
- CERTIFIED FINANCIAL PLANNER™ practitioner
- ACCREDITED INVESTMENT FIDUCIARY™ designee
- Has been in the financial services industry since 1994

James Schlager, Partner

- Born: Long Branch, NJ, 1963
- Bachelor of Science degree from Washington State University
- Master of Science degree in Financial Planning
- CERTIFIED FINANCIAL PLANNER™ practitioner
- Chartered Life Underwriter (CLU®)
- Has worked in the insurance and securities industry since 1987

SAN DIEGO

Sheryl L. Rowling, Partner

- Born: Detroit, MI, 1956
- Bachelor of Arts degree in Accounting from San Diego State University
- Master of Business Administration in Finance from San Diego State University
- American Institute of Certified Public Accountants' Personal Financial Specialist designation
- Has worked in the areas of finance, tax and personal wealth planning since 1979

Lisa A. Saxton

- Born: Fresno, CA, 1977
- Bachelor of Science degree in Business Administration from San Diego State University
- CERTIFIED FINANCIAL PLANNER™ practitioner
- Has worked in the financial services industry since 1999

Amanda Baker

- Born: Laconia, NH, 1977
- She attended Saint Michael's College, Colchester, Vermont
- Has worked in the financial services industry since 2000

OTHER BUSINESS ACTIVITIES

Moss Adams Wealth Advisors LLC is an investment advisory firm providing financial planning, consulting and investment advisory services to clients. Some of the Investment Advisor Representatives of Moss Adams Wealth Advisors LLC are also Registered Representatives of a FINRA member Broker/Dealer (Moss Adams Securities & Insurance LLC) and/or insurance agents. When acting as a Registered Representative or insurance agent, they may, from time to time, recommend to clients, transactions in open ended mutual funds, 529s plans or variable and fixed life insurance products. The representative, on behalf of the company, may earn a commission on such transactions. This commission is payable to the firm, not the Registered Representative. This financial incentive creates a conflict of interest between the client and the Investment Advisor Representatives of Moss Adams Wealth Advisors LLC.

Some of the Investment Advisor Representatives of Moss Adams Wealth Advisors LLC are active as partners of Moss Adams LLP.

OTHER FINANCIAL INDUSTRY ACTIVITIES OR AFFILIATIONS

BROKER/DEALER & INSURANCE AGENCY:

Investment Advisor Representatives of Moss Adams Wealth Advisors LLC may also be Registered Representatives or insurance agents of Moss Adams Securities & Insurance LLC, a FINRA member broker/dealer and general insurance agency. From time to time, Registered Representatives who are also Investment Advisor Representatives will execute or recommend the purchase of an insurance product. The Registered Representative, on behalf of the firm, may be paid a portion of the commission charged to the client on the execution of the transaction or a commission on the sale of an insurance product. This commission is paid directly to the firm, not the Registered Representative. This financial incentive to execute a transaction creates a conflict of interest between Moss Adams Wealth Advisors LLC and the client.

Any transactions resulting in commissions paid to representatives are not covered by an advisory agreement with Moss Adams Wealth Advisors LLC. Any fees or commissions paid by a client are in addition to investment advisory fees. Clients are not obligated to choose a representative of Moss Adams Wealth Advisors LLC to assist them in executing a transaction. Similar services are available from other vendors.

Moss Adams Wealth Advisors LLC may advise clients to open general securities accounts at Schwab Institutional and Fidelity Investments. Moss Adams Wealth Advisors LLC is not compensated directly for recommending Schwab or Fidelity. Schwab and Fidelity do provide software and internet access to monitor client accounts and provide research on securities; however, these are not conditioned upon business referrals.

Moss Adams Wealth Advisors LLC's Investment Advisor Representatives may refer clients to Moss Adams Securities & Insurance LLC, a limited broker-dealer registered with the SEC, and member of the FINRA and a general insurance agency. As a limited broker/dealer, Moss Adams Securities & Insurance LLC provides services for open ended mutual funds, 529 plans and variable or fixed insurance and may render advice as to the value and/or advisability of purchasing or selling said products.

Moss Adams Wealth Advisors LLC is a wholly owned subsidiary of Moss Adams Financial Services LLC which is wholly owned by Moss Adams LLP, a public accounting firm with offices in the Western United States. Pursuant to certain service agreements, Moss Adams Wealth Advisors LLC provides services to Moss Adams LLP and Moss Adams LLP provides services to Moss Adams Wealth Advisors LLC's clients. However, clients are never under any obligation to use Moss Adams LLP for any accounting services. Moss Adams LLP also provides office space, services and other miscellaneous overhead items to Moss Adams Wealth Advisors LLC for a fee determined on an annual basis. Moss Adams Wealth Advisors LLC does not provide accounting or legal advice.

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

Moss Adams Wealth Advisors LLC receives referrals of potential clients from partners and/or other Certified Public Accountants of Moss Adams LLP, an accounting firm. Moss Adams Wealth Advisors LLC is a wholly owned subsidiary of Moss Adams Financial Services LLC that is wholly owned by Moss Adams LLP, a public accounting firm. This affiliation creates a financial incentive for Moss Adams LLP professionals to refer clients to Moss Adams Wealth Advisors LLC. This financial incentive creates a conflict of interest between the potential clients and Moss Adams LLP professionals.

CONDITIONS FOR MANAGING ACCOUNTS

Clients will be expected to notify their IAR of any changes in their financial situation, investment objectives or account restrictions. Moss Adams Wealth Advisors LLC does not necessarily require a minimum amount to be invested. However, Moss Adams Wealth Advisors LLC may impose minimum fees for certain financial planning, consulting and investment advisory services.

REVIEW OF ACCOUNTS

Moss Adams Wealth Advisors LLC monitors portfolios for those clients within the investment management program on an ongoing basis while regular account reviews are conducted at least annually. For those clients whom Moss Adams Wealth Advisors LLC has provided personal financial planning, investment consulting services and/or insurance management and consulting, reviews are conducted on an as needed basis. These reviews are conducted by one of Moss Adams Wealth Advisors LLC's IARs. All clients are encouraged to discuss their needs, goals and objectives with Moss Adams Wealth Advisors LLC and to keep Moss Adams Wealth Advisors LLC informed of any changes. Moss Adams Wealth Advisors LLC shall contact the ongoing investment management clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the clients' financial situation and/or investment objectives.

Unless otherwise agreed upon, clients are provided with transaction confirmation notices and regular summary account statements from the broker/dealer or custodian for the client accounts. Those clients whom Moss Adams Wealth Advisors LLC provides investment management services will also receive a report from Moss Adams Wealth Advisors LLC that may include such relevant account and/or market-related information such as an inventory of account holdings and account performance on a quarterly basis. In addition to these quarterly reports, Moss Adams Wealth Advisors LLC shall provide its clients with tax reporting on an annual basis. Clients may opt out of receiving their Moss Adams Wealth Advisors quarterly reports, or may elect to receive them electronically.

Clients to whom Moss Adams Wealth Advisors LLC provides personal financial planning, investment consulting services and/or insurance management and consulting will receive reports from the Moss Adams Wealth Advisors LLC summarizing its analysis and conclusions as requested by the client or otherwise agreed to in writing by Moss Adams Wealth Advisors LLC.

INVESTMENT OR BROKERAGE DISCRETION

RECOMMENDATION OF A BROKER/DEALER (CUSTODIAN)

Moss Adams Wealth Advisors LLC will arrange for the execution of securities transactions for the account through a broker-dealer (Schwab Institutional or Fidelity Investments) that Moss Adams Wealth Advisors LLC reasonably believes will provide best execution. In selecting a broker-dealer, Moss Adams Wealth Advisors LLC may consider, among other things, the custodian's execution capabilities, reputation, respective financial strength, pricing, research and service. Schwab and Fidelity enable Moss Adams Wealth Advisors LLC to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commission and/or transaction fees charged by Schwab and/or Fidelity may be higher or lower than those charged by other broker/dealers.

The commissions paid by the Client shall comply with Moss Adams Wealth Advisors LLC's duty to obtain best execution. In seeking best execution, determination factors are not limited to just the lowest possible cost; other factors include, but are not limited to the range of services, including the value of research provided, execution capability, commission rates and responsiveness. Therefore, Moss Adams Wealth Advisors LLC will generally seek competitive transaction fees; however, Moss Adams Wealth Advisors LLC may not necessarily attempt to obtain the lowest possible fees for transactions for the account

Brokerage commissions and commission equivalent rates may, from time to time, be individually negotiated, and thus a client may be charged different commissions and commission equivalent rates than those charged to other clients for identical transactions. These different rates may be due to, among other things, differences in the size and nature of the respective accounts.

Moss Adams Wealth Advisors LLC may (but is not obligated to) bunch several clients' trades in the same security in a single order in an effort to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among Moss Adams Wealth Advisors LLC's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. If a bunched order is filled at several prices, an average price will be calculated and all participants in the bunched order will receive the average price. The average price to a particular client could be higher or lower than the actual price that would otherwise be paid by the client in the absence of bunching. The transaction costs incurred in the transaction will be prorated based on each client's participation in the transaction. Moss Adams Wealth Advisors LLC does not receive any additional compensation or remuneration as a result of bunching.

DIRECTED BROKERAGE

Moss Adams Wealth Advisors LLC's policy of prohibiting the acceptance of client instruction for the direction of brokerage has been communicated to relevant individuals including management, traders, and portfolio managers, among others.

The firm's advisory agreements and this disclosure document provide that the firm has discretion as to the selection of broker-dealers and may disclose the firm's policy of not accepting client directed brokerage instructions.

DISCRETIONARY ACCOUNT MANAGEMENT

Moss Adams Wealth Advisors LLC manages client accounts on both a Discretionary and Non-Discretionary basis. Two types of investment advisory agreements (IAA's) are currently available: 1) an agreement with two options: a fully discretionary or non-discretionary (which became available in IAAs executed after 1/1/05) and 2) a non-discretionary, attest agreement – which has additional management limitations.

Material investment restrictions that would cause an account to be deemed not fully discretionary and therefore not eligible for inclusion include, but are not limited to:

- Restricting trading activities conditioned upon client approval
- Limiting sale of legacy stock (low cost basis, or marked as client restricted)
- Restricting the purchase of certain securities or types of securities (socially responsible investing limitations, etc)

Each client enters into an investment advisory agreement with Moss Adams Wealth Advisors LLC whereby the client authorizes Moss Adams Wealth Advisors LLC to manage the client's investment account on either a discretionary or non-discretionary basis. All client accounts are managed on a "discretionary" basis unless specifically documented in the investment advisory agreement. After the client signs a written Investment Policy Statement, all securities transactions (unless otherwise restricted) that are determined to be appropriate to implement the clients policy will be executed without any further consultation with the client. All investment decisions will be guided by the client's Investment Policy Statement.

If the client's account is managed on a non-discretionary basis, the client may receive different execution prices (higher or lower) on securities bought or sold and may receive different transaction charges than if the account was managed on a discretionary basis, due to bunching/aggregated trades for fully discretionary accounts.

All fees and transactions costs charged by the broker/dealer (custodian) will be in addition to the advisory fees charged by Moss Adams Wealth Advisors LLC. These fees may include any mark up or mark down that the client may pay to the broker/dealer Moss Adams Wealth Advisors LLC selects to purchase or sell a security.

When exercising investment discretion, Moss Adams Wealth Advisors LLC will not invest in Initial Public Offerings (IPO's).

ADDITIONAL COMPENSATION

Investment Advisor Representatives of Moss Adams Wealth Advisors LLC in their individual capacity as a Registered Representative of the FINRA Broker/Dealer Moss Adams Securities & Insurance LLC and affiliated entities may receive commissions on securities transactions that a client places through them. These commissions are payable directly to the firm, not the individual Registered Representative.

Some clients with pre-existing mutual fund C shares may have their fees adjusted to account for 12b-1 compensation received.

Moss Adams Wealth Advisors LLC may recommend that clients establish brokerage accounts with the Schwab institutional division of Charles Schwab & Co., Inc (Schwab), a registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Moss Adams Wealth Advisors LLC is independently owned and operated and not affiliated with Schwab. Schwab provides Moss Adams Wealth Advisors LLC with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as the total of at least $10 million of the advisors clients' assets is maintained in accounts at Schwab Institutional and is not otherwise contingent upon Moss Adams Wealth Advisors LLC committing to Schwab any specific amount of business (assets in custody or trading). Schwab's services include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For Moss Adams Wealth Advisors LLC's clients' accounts maintained in its custody, Schwab generally does not charge separately for custody but is compensated by account holders through commission or other transaction-related fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to Moss Adams Wealth Advisors LLC other products and services that benefit Moss Adams Wealth Advisors LLC, but may not benefit its clients' accounts. Some of these other products and services assist the firm in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of Moss Adams Wealth Advisors LLC's fees from its clients' accounts; and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of Moss Adams Wealth Advisors LLC accounts, including accounts not maintained at Schwab institutional. Schwab Institutional also makes available to Moss Adams Wealth Advisors LLC other services intended to help the firm manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, Schwab may make available, arrange and /or pay for these services rendered to Moss Adams Wealth Advisors LLC by independent third parties. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third party providing these services to Moss Adams Wealth Advisors LLC. While as a fiduciary, Moss Adams Wealth Advisors LLC endeavors to act in its clients' best interests and the firm's recommendation that clients maintain their assets in accounts at Schwab may be based in part on the benefit to the firm of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create potential conflict of interest.

Moss Adams Wealth Advisors LLC may also recommend that clients establish brokerage accounts with Fidelity Investments. Moss Adams Wealth Advisors is independently owned and operated and not affiliated with Fidelity. Moss Adams Wealth Advisors LLC's clients may receive benefits that they would not receive if Moss Adams Wealth Advisors LLC did not provide investment advice to clients, similar to those described above for Schwab.

CODE OF ETHICS SUMMARY

Moss Adams Wealth Advisors LLC has established rules of conduct for all employees which are designed to, among other things; govern personal securities trading activities in the accounts of employees. The Code is based upon the principle that Moss Adams Wealth Advisors LLC and its employees owe a fiduciary duty to Moss Adams Wealth Advisors LLC's clients to conduct their affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

The Code is designed to ensure that the high ethical standards long maintained by Moss Adams Wealth Advisors LLC continues to be applied. The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. The excellent name and reputation of our firm continues to be a direct reflection of the conduct of each employee.

Pursuant to Section 206 of the Advisers Act, both Moss Adams Wealth Advisors LLC and its employees are prohibited from engaging in fraudulent, deceptive or manipulative conduct. Compliance with this section involves more than acting with honesty and good faith alone. It means that the Moss Adams Wealth Advisors LLC has an affirmative duty of utmost good faith to act solely in the best interest of its clients.

Clients may contact our main office for a full copy of our Code of Ethics policy.

PROXY VOTING POLICY

Proxy voting is an important right of shareholders and reasonable care and diligence must be undertaken to ensure that such rights are properly and timely exercised.

Moss Adams Wealth Advisors LLC, as a matter of policy and as a fiduciary to our clients, has responsibility for voting proxies for portfolio securities consistent with the best economic interests of the clients. Our firm maintains written policies and procedures as to the handling, research, voting and reporting of proxy voting and makes appropriate disclosures about our firm's proxy policies and practices. Our policy and practice includes the responsibility to monitor corporate actions, receive and vote client proxies and disclose any potential conflicts of interest as well as making information available to clients about the voting of proxies for their portfolio securities and maintaining relevant and required records.

For a complete copy of the policy or guidelines and inquiries regarding how a specific proxy proposal was voted, please contact our main office.

PRIVACY POLICY

Moss Adams Wealth Advisors LLC, an independent investment advisory firm, is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence.

These records include all personal information that we collect from you in connection with any of the services provided by Moss Adams Wealth Advisors LLC. We have not disclosed information to nonaffiliated third parties, except as permitted by law, and do not anticipate doing so in the future. If we were to anticipate such a change in firm policy, we would be prohibited under the law from doing so without advising you first. As you know, we use health and financial information that you provide to us to help you meet your personal financial goals while guarding against any real or perceived infringements of your rights of privacy. Our policy with respect to personal information about you is listed below.

1) We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities' transactions on your behalf or so that our firm can discuss your financial situation with your accountant or lawyer.)
2) We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
3) The categories of nonpublic personal information that we collect from a client depend upon the scope of the client engagement. It will include information about your personal finances, information about your health to the extent that it is needed for the planning process, information about transactions between you and third parties, and information from consumer reporting agencies.

PRIVACY POLICY (CONTINUED)

4) For unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law.
5) We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.
6) Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws, and consistent with the CFP Board Code of Ethics and Professional Responsibility. After this required period of record retention, all such information will be destroyed.

This privacy policy applies to Moss Adams Wealth Advisors LLC, Moss Adams Financial Services LLC and Moss Adams Securities & Insurance LLC.

Important Privacy Choice for California Residents:

You have the right to control whether we share some of your personal information. You can restrict the sharing of personal and financial information with our affiliates and outside companies that we do business with. To exercise this choice, you must notify us in writing that you wish to opt out. Notifications may be sent to the Seattle Main office.

BUSINESS CONTINUITY PROGRAM

Since the terrorist activities of 9/11/2001, all advisory firms need to establish written disaster recovery and business continuity plans for the firm's business. This will allow advisers to meet their responsibilities to clients as a fiduciary in managing client assets, among other things. It also allows a firm to meet its regulatory requirements in the event of any kind of an emergency or disaster, such as a bombing, fire, flood, earthquake, power failure or any other event that may disable the firm or prevent access to our office(s).

As part of its fiduciary duty to its clients and as a matter of best business practices, Moss Adams Wealth Advisors LLC, has adopted policies and procedures for disaster recovery and for continuing Moss Adams Wealth Advisors LLC's business in the event of an emergency or a disaster. These policies are designed to allow Moss Adams Wealth Advisors LLC to resume providing service to its clients in as short a period of time as possible. These policies are, to the extent practicable, designed to address those specific types of disasters that Moss Adams Wealth Advisors LLC might reasonably face given its business and location.

Clients may contact our main office for a full copy of our Disaster Recovery Program.