ITEM 1 - COVER PAGE

Part 2A of Form ADV: Firm Brochure

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March 30, 2026

This brochure provides information about the qualifications and business practices of Financial Synergies Wealth Advisors, Inc.("FSWA"). If you have any questions about the contents of this brochure, please contact us at 713-623-6600 or mvillard@finsyn.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. FSWA is an investment adviser registered with the SEC Registration as an Investment Adviser does not imply any level of skill or training.

Additional information about FSWA is available on the SEC's website at https://adviserinfo.sec.gov/. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 105643.

ITEM 2 - MATERIAL CHANGES

The purpose of this page is to inform you of material changes to our brochure.

Since our last annual updating amendment dated, March 25, 2025, we have the following material changes:

1) The disclosure in Item 14 regarding FSWA's use of promoters was updated to reflect that the firm no longer compensates non-advisory personnel (solicitors/promoters) for client referrals.

Pursuant to applicable rules, FSWA will ensure that clients receive a summary of any material changes to this Brochure within 120 days of the close of the Firm's fiscal year. Additionally, as the Firm experiences material changes in the future, we will send you a summary of our "Material Changes" under separate cover or this Brochure in its entirety. FSWA's Brochure is available for free upon request and may be requested by contacting us at 713-623-6600 or marie@finsyn.com.

FSWA encourages each client to read this Brochure carefully and to contact us with any questions. For more information about our firm, please visit https://www.finsyn.com/.

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ITEM 4 - ADVISORY BUSINESS

Financial Synergies Wealth Advisors, Inc. (Financial Synergies) is an SEC-registered investment adviser with its principal place of business located in Houston, Texas. Financial Synergies began conducting business as a registered investment adviser in 1986. Financial Synergies also conducts business under the following names: Financial Synergies and Financial Synergies Pathway. Michael Minter, Heath Hightower and Bryan Zschiesche are 26.1% equal owners/shareholders of Financial Synergies. Marie Villard Schmoyer, William Goodson, and Kevin Nelson are minority shareholders. Financial Synergies offers the following advisory services to clients:

Investment Management Services

We manage investment advisory accounts using a diversified asset allocation approach. Each portfolio is designed to meet a particular investment goal. We manage these advisory accounts on a discretionary and non-discretionary basis - with account supervision guided by the stated objectives of the client (e.g., capital appreciation, growth, income, or growth and income).

Through discussions in which the client's goals and objectives are established, we will determine which portfolio allocation is best suited to the client's individual needs and circumstances. Once the appropriate allocation has been determined, the Investment Plan will be presented to the client, after which the assets will be invested accordingly. Clients will have the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Clients will retain individual ownership of all securities.

Each investment portfolio consists primarily of no-load mutual funds and exchange traded funds (ETFs). As appropriate, portfolios may also include individual equities, bonds, variable annuities, variable life insurance products and/or other investment products. Weighting among funds or other securities and asset classes is determined by the appropriate allocation.

In order to ensure that our initial determination of an appropriate portfolio continues to be suitable, and that the client's account continues to be managed in a manner fitting to the client's financial circumstances, we will seek to maintain client suitability information current at all times. To assist us in these efforts, we ask that clients notify us promptly of any change in their financial circumstances.

We monitor Investment Management Services accounts at least weekly and rebalance these accounts as needed. If we believe that a particular investment is performing inadequately, or that a different investment has become more suitable for the portfolio's goal, then we will recommend a different investment and reinvest the client's assets in accordance with the discretionary authority granted by the client. In the case of nondiscretionary accounts, the client will make the recommended changes. Clients may impose restrictions on investing in certain securities or types of securities.

We also offer Pathway®, a financial goals-based investment program designed for people in the early stages of building wealth.

Envestnet Platform: The Envestnet platform is a web-based managed account platform intended to assist financial advisors and financial institutions in managing their business through the Envestnet Platform tools. Through the Envestnet Platform, Financial Synergies can allocate an Advisory Client's assets among the separately managed account program ("SMA Program"), fund strategist portfolios program ("FSP Program"), and unified managed account program ("UMA Program") and determine the suitability of the asset allocation and investment options for each Advisory Client. The proposal generation tool provided by Envestnet is solely for the use of Financial Synergies in connection with Financial Synergies service to Advisory Clients.

Sub-advisory Arrangements: We have the following arrangements with Sub advisers under the Schwab Managed Account Platform where our selection criteria are based on facts and circumstances of the client relationship:

1) Parametric Portfolio Associates, LLC (“Subadvisor”) provide discretionary investment management services for designated Account assets upon the terms and conditions of the Agreement and each Investment Strategy Addendum between Subadvisor and Financial Synergies.
2) Third Party Advisory Agreements: We may choose other third-party advisors to provide sub-advisory services for a portion of the client’s portfolio. Clients will enter into an account agreement directly with the Subadvisor that describes the advisory fee and related expenses to be paid to the Subadvisor. FSWA will have access to client’s information at Subadvisor by access to downloads.

Financial Planning Services

We provide a variety of Financial Planning Services to individuals, families, and other clients regarding the management of their financial resources based upon discovery and analysis of the Client’s current situation, goals, and objectives. Advisor will prepare a written plan that may encompass one or more of the following areas: Investment Planning, Retirement Planning, Estate Planning, Charitable Planning, Education Planning, Personal Tax Planning,

The Advisor’s written financial plans rendered to the clients usually include general recommendations for a course of activity or specific actions to be taken by the clients. For example, recommendations may be made that the clients begin or revise investment programs, create or revise wills or trusts, obtain or revise insurance coverage, commence or alter retirement savings, or establish education or charitable giving programs. (It should also be noted that we may refer clients to an accountant, attorney, or other specialist as necessary for non-advisory related services.) For written financial planning engagements, we provide our clients with a written summary of their financial situation, and our firm’s observations and recommendations. Plans are typically completed within six (6) months of the client signing this contract, if all the information and documents we request from the Client are provided to us promptly. Implementation of the recommendations will be at the discretion of the client. Once the financial plan is delivered, clients have the option to engage Financial Synergies for Asset Management Services or updates as outlined in the General Consulting and Plan Update Agreement Addendum.

We provide investment advice to you regarding your retirement plan account or individual retirement account, We are a fiduciary 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 earn revenue 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 interest ahead of yours. Under this special rule’s provisions, we must:

- 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.

Held Away Account Services

We provide an additional service for accounts not under our Investment Management Service where it is not possible for us to enact trades through the normal custodian. These are primarily 401(k) accounts, 529 plans, and variable annuities. We meet with clients regularly to review the current holdings in these accounts, suggest and place appropriate trades, monitor the accounts, and provide statements and performance reporting on an ongoing basis.

Clients must agree to the Account Aggregation and Online Credentials policy from the applicable platform to enable these services. Clients must enter their credentials and or online account access information via the applicable platform with respect to their financial accounts. Clients must consent for and authorize the provider

to connect directly to their financial accounts at the applicable Financial Institution in order to access data, as applicable, and authorize Financial Synergies to communicate orders, as applicable.

We DO NOT participate in any wrap fee programs.

Amount of Managed Assets

We manage assets on either a discretionary basis or non-discretionary basis. As of December 31, 2025, the values of these assets are as follows:

Discretionary Assets:	$ 1,797,538,179
Non-Discretionary Assets:	$ 13,765,736
Total Assets Under Management:	$ 1,811,303,915

ITEM 5 - FEES AND COMPENSATION

We are compensated solely via a management fee for our advisory services.

Our fees are charged in one of two ways, as agreed in advance with the client: 1) an annual fee based on a percentage of assets under management, or 2) a performance-based fee.

Asset-Based Fee

Most of our clients compensate us through an asset-based fee. Under this approach, our management fee is calculated as a percentage of the value of our client's account(s) per year. We use a standardized scale to generate this percentage fee. This fee ranges from 0.75% to 1.50%. In limited cases and under special circumstances, we will depart from our standardized approach and negotiate a modified scaled fee or flat percentage fee.

For Clients utilizing the **Envestnet Platform**, the fee schedule is as follows:

Account Assets	Platform Fee*
First $5,000,000	4 basis points per account, per year
Next $5,000,000	3 basis points per account, per year
Over $10,000,000	2 basis points per account, per year

*This is in addition to the asset-based fee noted above.

- Custodial fees and portfolio manager fees (as applicable) are not included within the platform fee.
- Access to Envestnet | PMC Research Services included within the Platform Fee.
- Minimum annual per account fee: $50

Tax Overlay Services & Impact Overlay Services

Account Assets	Overlay Service Fee
First $10,000,000	10 basis points
Next $15,000,000	8 basis points
Over $25,000,000	5 basis points

*Accounts utilizing both Impact and Tax overlay service will be charged only one Overlay Service Fee.

Account Minimums

We typically require a minimum of $1,000,000 in assets for **Investment Management Services**. The minimum for the **Financial Synergies Pathway Program** is $500,000, and if the account balance falls below $500,000, a minimum fee of $395.00 will be paid monthly from an outside account. We can, however, choose to waive our minimum in certain situations. We may group certain related client accounts for the purposes of determining the annual fee. Our compensation is based only on a percentage of assets under management.

Subadvisory Arrangements

1) For each Account to which Parametric Portfolio Associates, LLC ("Subadvisor") provides services we shall pay a fee to them ranging from .05% to .035% depending on the size of the account. The client is not charged any fees above what is agreed to in the Asset Management Agreement with Financial Synergies. The fees and payment arrangements may be negotiable between Financial Synergies and Sub Adviser and may vary on a case-by-case basis.
2) For third-party advisory agreements, clients will enter into an agreement directly with the Subadvisor that describes the advisory fee and related expenses to be paid to the Subadvisor.

How Fees Are Billed

Unless otherwise agreed, fees are generally directly deducted from the client's custodial account, in advance, on a quarterly basis. The first payment is due at the beginning of the first full quarter after the client executes the Agreement. The first fee will include both the normal quarterly fee paid in advance and a pro-rated fee adjusted for contributions and withdrawals for the first partial quarter. Subsequent payments are due and will be assessed on the first day of each calendar quarter. The fee is based on the value of the account as of the close of business on the last business day of the preceding quarter as valued by the custodian. For additional contributions greater than or equal to $1,000 made to the accounts during the quarter, fees are pro-rated from that date to the last day of the quarter. For withdrawals greater than or equal to $1,000 from accounts during a quarter, fees are refunded on a pro-rata basis. No adjustments are made for additions or withdrawals less than $1,000. For account balances under $250,000, fees are debited monthly, in advance in accordance with the executed agreement.

PERFORMANCE-BASED FEE:

Although rare, some clients may prefer a Performance-Based Fee rather than an Asset-Based Fee. We may enter into this fee arrangement with the client as permitted by applicable regulations. To qualify for a Performance-Based Fee arrangement, the client must have at least $1,100,000 under our management or a net worth of more than $2,200,000 – excluding primary residence.

Under a Performance-Based Fee arrangement, we may charge fees of up to 20% of the account's net profits generated per calendar quarter provided that such amount is only applied to the portion of the profits that exceeds any cumulative gains. The fee is calculated and charged on a quarterly basis in arrears using a "high watermark" methodology – which entails the establishment of a new "watermark" based on the highest level of cumulative portfolio gains at the end of any given calendar quarter. Contributions to an account increase the watermark by the amount of the contribution, and withdrawals from an account reduce the watermark by the amount of the withdrawal. A Performance-Based Fee is charged only if the most recent calendar quarter's watermark is higher than any previous quarter's watermark adjusted for any contributions or withdrawals. The initial period used for performance-based fees shall be from the date of the first buy through the last day of the calendar quarter.

Clients can qualify for Performance-Based Fee breakpoints based on the following chart:

Portfolio Value	Client Share of Gain	Our Share of Gain
$1.1 Mill - $5 Mill	80%	20%
$5 Mill - $10 Mill	85%	15%
$10 Mill & Up	90%	10%

Net profits mean all income or gain attributable to a client's account from any source including, but not limited to: interest, dividends, distributions, options and futures premiums, and realized and unrealized capital gains, less any expenses paid with respect to the client's account including but not limited to administrative charges, fees charged by Financial Synergies, margin interest and securities brokerage fees. Contributions or withdrawals by the client from the account are not included in the calculation of net profits, although income and gain resulting from additions are counted.

In addition, the client is charged a 0.25% Annual Administration Fee, which is assessed quarterly in advance. This administration fee is calculated as a percentage of assets under management and is subject to the same policies and procedures that are outlined in the Asset-Based Fee section. Financial Synergies reserves the right to waive this administration fee in certain circumstances.

The initial period used for calculating administration fees shall be from the initial date of engagement through the last day of the calendar quarter. Subsequent calculation periods shall be the next calendar quarter period and each quarter thereafter, unless earlier terminated.

To help clients understand the impact of paying a Performance-Based Fee versus a standard Asset-Based Fee, the following example is provided:

An account has a beginning value of $500,000 and during the quarter the account earns $50,000 and has an ending value of $550,000. If the client paid the standard 1.50% management fee, the client would have been charged at the beginning of the quarter a management fee of $1,875 ($500,000 x 1.50%) / 4). Under a Performance-Based Fee arrangement the client would owe $10,000 ($50,000 x 20%). On the other hand, if the account incurred a loss during the quarter, then Financial Synergies would not earn a Performance-Based Fee. However, if the client is paying a standard Asset-Based Fee, we would earn a fee regardless of if the account incurred a gain or loss.

****It is anticipated that over time the client's account value will increase, thus making the Performance Based Fee schedule more expensive than the Asset-Based Fee schedule.**

Financial Planning Services

We charge a fixed fee ranging from $3,000.00 to $10,000.00 depending on complexity, which will be based on the discovery/analysis and scope of the engagement. Advisor reserves the right to negotiate fees. We reserve the right to negotiate fees. The fee will be paid promptly as noted in the agreement.

If Client, within 30 days of completion of the financial plan, retains Advisor's Asset Management Services, Advisor will credit the Financial Planning Services fee to subsequent Asset Management fees. If Client does not decide to retain Asset Management Services, Client may instead elect to retain Advisor for ongoing plan maintenance based on Advisor's General Consulting Agreement Addendum. We charge a flat fee of $1000.00. The fee will be paid upon receipt of an invoice, as noted in the agreement.

Held Away Account Services

We charge an annual fee for services provided to these held away accounts, which is deducted from a non-IRA account under our Investment Management Service on a quarterly basis in advance. Fees are based on the assets within these accounts and are charged the same rate as the client's Asset Management Agreement fee schedule annually according to the valuation of the accounts at the close of the quarter as valued by the account custodian.

General Information

Negotiability of Fees

In certain circumstances, all fees may be negotiable. Financial Synergies reserves the right to adjust the fee schedule for accounts depending on the size and type of account and the services required. In some cases, negotiation of fees may result in different fees being charged for similar services and may be less than the stated fees. In addition, certain family members and personal acquaintances of Financial Synergies' affiliated persons may receive advisory services at a discounted rate which is not generally available to advisory clients.

Termination

A client agreement may be canceled at any time, by either party, for any reason upon notice to the other party. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be promptly refunded according to the number of days remaining in the billing period.

Other Fees and Expenses

All fees paid to Financial Synergies for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and ETFs to their shareholders. In the case of mutual funds, these fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. The client could invest in a fund directly, without the services of Financial Synergies. In that case, the client would not receive the services provided by Financial Synergies which are designed, among other things, to assist the client in determining which fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by Financial Synergies to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Additional Fees and Expenses

In addition to Financial Synergies' advisory fees, clients are responsible for the fees and expenses charged by custodians and imposed by broker-dealers.

Advisory Fees in General

Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisors for similar or lower fees.

ERISA Clients

Financial Synergies provides all prospective clients subject to Section 408(b)(2) of the Employee Retirement Income Security Act of 1974 (ERISA) with a Section 408(b)(2) Fee and Services Disclosure.
Additionally, the Agreement executed between any ERISA plan and Financial Synergies includes both a description of services that the firm will provide each ERISA plan, and whether such services are provided by Financial Synergies as a fiduciary or a non-fiduciary.

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 interest ahead of yours. Under this special rule's provisions, we must:

- 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.

Fiduciary Status – FSWA is registered as an investment adviser under the Investment Advisers Act of 1940 and represents that it is not subject to any disqualification as set forth in Section 411 of ERISA. In performing fiduciary services, we are acting either as a non-discretionary fiduciary of the Plan as defined in Section 3(21) under ERISA and may also act as a discretionary fiduciary of the plan as defined in Section 3(38) under ERISA, as set forth in the arrangement with each plan sponsor.

ITEM 6 - PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

As we disclosed in the previous section of this Brochure, our firm enters Performance-Based Fee arrangements with certain clients as appropriate. This means that we manage accounts paying us on a performance basis side-by-side with accounts not paying performance fees.

Since we always endeavor to put the interest of our clients first as part of our fiduciary duty as a registered investment adviser, we take the following steps to address any conflicts that may arise with a Performance- Based Fee arrangement:

1) We disclose to clients the existence of all material conflicts of interest.
2) We collect, maintain and document accurate, complete, and relevant client background information, including the client's financial goals, objectives, and risk tolerance.
3) Our management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances and have implemented policies and procedures for fair and consistent allocation of investment opportunities among all client accounts as appropriate.
4) On a quarterly basis, we compare holdings and performance of all accounts with similar strategies to identify significant performance disparities indicative of possible favorable treatment.
5) On a quarterly basis, we review trading frequency and portfolio turnover rates to identify possible patterns of "window dressing," "portfolio churning," or any intent to manipulate trading to boost performance near the reporting period.
6) We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients and equitable treatment of all clients, regardless of the fee arrangement.

Performance-Based Fees will only be charged in accordance with the provisions of Rule 205-3 of the Investment Advisers Act of 1940 and/or applicable state regulations. The fees will not be offered to any client residing in a state in which such fees are prohibited.

The client must understand the Performance-Based Fee method of compensation and its risks prior to entering into a management contract with us.

**To be clear – we have no intention of treating or investing our Performance-Based Fee clients any differently than we do our Asset-Based Fee clients.

ITEM 7 - TYPES OF CLIENTS

Financial Synergies provides advisory services to individuals, including high net worth individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and other businesses.

ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Financial Synergies constructs portfolios for our clients using a mix of individual stocks, bonds, ETFs, exchange traded notes, closed-end funds, mutual funds, structured products, alternative investments, and cryptocurrencies.

Methods of Analysis

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Fund Analysis

When selecting a mutual fund or exchange-traded fund (ETF) for our portfolios, we analyze many different factors including conversations with the fund manager; performance history and consistency; fund category; track record; investment objectives; composition and focus; and stewardship; and fee structure and expenses. We want to see that the manager has demonstrated an ability to invest successfully over a long period of time and in different economic conditions. We also look at the underlying securities in a fund to determine if there is significant overlap in the underlying investments held in other funds in client portfolios. We also monitor the funds regularly to determine if they are continuing to follow their stated investment strategy.

A risk of fund analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund, which could make the fund less suitable for the client's portfolio. It is our job to monitor this and adjust the portfolio as needed – which we do on a regular basis.

Legacy Holdings

Investment advice may be offered on any investment held by a client at the start of the advisory relationship. In general, depending on tax considerations and client sentiment, these investments will be sold over time and the assets invested in the appropriate Financial Synergies strategy. As with any investment decision, there is the risk that Financial Synergies' timing with respect to the sale and reinvestment of these assets will be less than ideal or even result in a loss to the client.

Risks for all forms of analysis

Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Investment Strategies

We use the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Asset Allocation

The primary investment strategy used by Financial Synergies is based on diversification of the client's assets among a variety of investment vehicles and asset classes, popularly termed "Asset Allocation". The focus of Financial Synergies' recommendations is primarily to achieve a diversified portfolio of investment assets with desirable risk and return characteristics. Financial Synergies' Investment Committee meets regularly to evaluate new and reevaluate existing investment opportunities. During these meetings we deliberate issues regarding the proper allocation of client assets based on current conditions.

Long-term purchases

In general, we purchase securities with the idea of holding them in the client's account long-term (longer than one year). In extreme circumstances, we may be forced to sell a fund completely, within a year of buying it. An example would be a fund manager resigns, and we do not have confidence in the new management. Also, fund positions may be trimmed occasionally to rebalance the portfolio.
A risk in a long-term purchase strategy is that by holding the security for this length of time, it may decline in value before we make the decision to sell. Financial Synergies does not guarantee the future performance of the account or any specific level of performance, the success of any investment decision or strategy that the Firm may use, or the success of the Firm's overall management of the account. The client understands that the investment decisions we make for the client's account are subject to various market, currency, economic, political, and business risks, and that those investment decisions will not always be profitable. Clients are reminded that investing in any security entails risk of loss which they should be willing to bear.

General Risks

Investing in securities involves a risk of loss that you should be prepared to bear, including loss of your original principal. Past performance is not indicative of future results; therefore, you should not assume that future performance of any specific investment or investment strategy will be profitable. We do not provide any representation or guarantee that your goals will be achieved.

Digital Assets – We may invest client accounts in virtual currencies, crypto-currencies, and digital coins and tokens ("Digital Assets"). The investment characteristics of Digital Assets generally differ from those of traditional currencies, commodities, or securities. Importantly, Digital Assets are not backed by a central bank or a national, supra-national or quasi-national organization, any hard assets, human capital, or other form of credit. Rather, Digital Assets are market-based: a Digital Asset's value is determined by (and fluctuates often, according to) supply and demand factors, the number of merchants that accept it, and/or the value that various market participants place on it through their mutual agreement, barter, or transactions.

Price Volatility of Digital Assets – A principal risk in trading Digital Assets is the rapid fluctuation of market price. High price volatility undermines Digital Assets' role as a medium of exchange as consumers or retailers are much less likely to accept them as a form of payment. The value of client portfolios relates in part to the value of the Digital Assets held in the client portfolio and fluctuations in the price of Digital Assets could adversely affect the value of a client's portfolio. There is no guarantee that a client will be able to achieve a better than average market price for Digital Assets or will purchase Digital Assets at the most favorable price available. The price of Digital Assets achieved by a client may be affected generally by a wide variety of complex and difficult to predict factors such as Digital Asset supply and demand; rewards and transaction fees for the recording of transactions on the blockchain; availability and access to Digital Asset service providers (such as payment processors), exchanges, miners or other Digital Asset users and market participants; perceived or actual Digital Asset

network or Digital Asset security vulnerability; inflation levels; fiscal policy; interest rates; and political, natural and economic events.

Digital Asset Service Providers – Several companies and financial institutions provide services related to the buying, selling, payment processing and storing of virtual currency (i.e., banks, accountants, exchanges, digital wallet providers, and payment processors). However, there is no assurance that the virtual currency market, or the service providers necessary to accommodate it, will continue to support Digital Assets, continue in existence, or grow. Further, there is no assurance that the availability of and access to virtual currency service providers will not be negatively affected by government regulation or supply and demand of Digital Assets. Accordingly, companies or financial institutions that currently support virtual currency may not do so in the future.

Custody of Digital Assets – Under the Advisers Act, SEC registered investment advisers are required to hold securities with "qualified custodians," among other requirements. Certain Digital Assets may be deemed to be securities. Currently, many of the companies providing Digital Assets custodial services fall outside of the SEC's definition of "qualified custodian", and many long-standing, prominent qualified custodians do not provide custodial services for Digital Assets or otherwise provide such services only with respect to a limited number of actively traded Digital Assets. Accordingly, clients may use non-qualified custodians to hold all or a portion of their Digital Assets.

Government Oversight of Digital Assets – The regulatory schemes—both foreign and domestic—possibly affecting Digital Assets or a Digital Asset network may not be fully developed and subject to change. It is possible that any jurisdiction may, in the near or distant future, adopt laws, regulations, policies or rules directly or indirectly affecting a Digital Asset network, generally, or restricting the right to acquire, own, hold, sell, convert, trade, or use Digital Assets, or to exchange Digital Assets for either fiat currency or other virtual currency. It is also possible that government authorities may take direct, or indirect investigative or prosecutorial action related to, among other things, the use, ownership, or transfer of Digital Assets, resulting in a change to its value or to the development of a Digital Asset network.

Structured Products - A structured product, also known as a market-linked product, is generally a prepackaged investment strategy based on derivatives, such as a single security, a basket of securities, options, indices, commodities, debt issuances, and/or foreign currencies, and to a lesser extent, swaps. Structured products are usually issued by investment banks or affiliates thereof. They have a fixed maturity and have two components: a note and a derivative. The derivative component is often an option. The note provides for periodic interest payments to the investor at a predetermined rate, and the derivative component provides for the payment at maturity. Some products use the derivative component as a put option written by the investor that gives the buyer of the put option the right to sell to the investor the security or securities at a predetermined price. Other products use the derivative component to provide a call option written by the investor that gives the buyer of the call option the right to buy the security or securities from the investor at a predetermined price. A feature of some structured products is a "principal guarantee" function, which offers protection of principal if held to maturity. However, these products are not always Federal Deposit Insurance Corporation insured; they may only be insured by the issuer, and thus have the potential for loss of principal in the case of a liquidity crisis, or other solvency problems with the issuing company. Investing in structured products involves a number of risks including but not limited to: fluctuations in the price, level or yield of underlying instruments, interest rates, currency values and credit quality; substantial loss of principal; limits on participation in any appreciation of the underlying instrument; limited liquidity; credit risk of the issuer; conflicts of interest; and other events that are difficult to predict.

ITEM 9 - DISCIPLINARY INFORMATION

Registered investment advisers such as FSWA are required to disclose all material facts regarding any legal or disciplinary events that are or would be material to a client's or prospective client's evaluation of FSWA or the integrity of its management.

FSWA has one disciplinary report involving a regulatory action, the details of which are summarized below. Should you have any questions, please contact our Chief Compliance Officer.

Undertaking Pursuant to SEC Administrative Proceeding

On September 17, 2024, FSWA consented to the entry of an Order Instituting Administrative and Cease-and-Desist Proceedings pursuant to Section 21C of the Securities Exchange Act of 1934 and Section 203(e) of the Investment Advisers Act of 1940, Making Findings, and Imposing Remedial Sanctions and a Cease-and-Desist Order ("Order"), *In the Matter of Financial Synergies Wealth Advisors, Inc.,* (https://www.sec.gov/files/litigation/admin/2024/34-101057.pdf). The SEC found that from December 2019 to April 2024, FSWA had investment discretion over at least $100 million of reportable 13F securities and was therefore obligated to file quarterly Forms 13F beginning by at least 2020. However, FSWA failed to file Forms 13F until April 2024. As a result, FSWA entered into an Offer of Settlement and agreed to, among other things, pay a civil monetary penalty of $225,000. The SEC took into account certain remedial acts that FSWA promptly undertook and continues to undertake.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Financial Synergies nor any of its employees have other external affiliations to report to you.

ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Financial Synergies and our personnel owe a duty of loyalty, fairness, and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of employee securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's employees. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement, and recordkeeping provisions.

Financial Synergies' Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

Financial Synergies and individuals associated with our firm are prohibited from engaging in principal or agency cross transactions.

Our Code of Ethics is designed to ensure that the personal securities transactions, activities, and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts' securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security, which may also be recommended to a client.

It is the expressed policy of our firm that no person employed by us may purchase or sell an individual stock prior to a transaction being implemented for an advisory account, thereby preventing such employee from benefiting from transactions placed on behalf of advisory clients. As these situations present conflicts of interest, we have established the following to ensure their fiduciary responsibilities:

1) No director, officer or employee of Financial Synergies shall buy or sell securities for his/her personal portfolio when the decision is substantially derived, in whole or in part, by reason of his/her employment unless the information is also available to the investing public on reasonable inquiry. No person of Financial Synergies shall prefer his/her own interest to that of the advisory client.
2) Financial Synergies maintains a list of all securities holdings for itself, and anyone associated with this advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by the Portfolio Manager.
3) Financial Synergies emphasizes the unrestricted right of the client to decline to implement any advice rendered.
4) Financial Synergies requires that all firm individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
5) Any firm individual not in observance of the above may be subject to disciplinary action up to and including termination.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy from us at any time**.**

ITEM 12 - BROKERAGE PRACTICES

Investment Management Services

The custodian and brokers we use Financial Synergies ("we"/"our") do not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15 - Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (Schwab) or Fidelity Brokerage Services (Fidelity), registered broker-dealers, member SIPC, as the qualified custodian(s).
We are independently owned and operated and are not affiliated with Schwab or Fidelity. Schwab or Fidelity will hold your assets in a brokerage account and buy and sell securities when we/you instruct them to. While we recommend that you use Schwab or Fidelity as custodian/broker, you will decide whether to do so and will open your account with Schwab or Fidelity by entering into an account agreement directly with them. Conflicts of interest associated with this arrangement are described below as well as in Item 14 (Client referrals and other compensation). You should consider these conflicts of interest when selecting your custodian.

We reserve the right to decline acceptance of any client account for which the client directs the use of a broker-dealer other than Schwab or Fidelity if we believe that the client's choice would hinder our ability to service the account. In directing the use of Schwab or Fidelity, or any other broker-dealer, Financial Synergies will not have authority to negotiate commissions on a trade-by-trade basis, or to necessarily obtain volume discounts, and best execution may not be achieved.

How we select brokers/custodians

We recommend the use of Schwab or Fidelity, a custodian/broker, to hold your assets and execute transactions. When considering whether the terms that Schwab or Fidelity provides are, overall, most advantageous to you when compared with other available providers and their services, we consider a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions

- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to
- Reputation, financial strength, security, and stability
- Prior service to us and our clients
- Services delivered or paid for by Schwab or Fidelity
- Availability of other products and services that benefit us, as discussed below (see "Products and services available to us from Schwab or Fidelity")

Your brokerage and custody costs

For our clients' accounts that are maintained by Schwab or Fidelity, Schwab or Fidelity generally do not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab or Fidelity account. Certain trades (for example, mutual funds and ETFs) do not incur Schwab or Fidelity commissions or transaction fees. This commitment benefits clients because the overall commission rates clients pay are lower than they would be otherwise. In addition, to commissions, Schwab / Fidelity charges clients a flat dollar amount as prime broker or trade away fee for each trade that we have executed by a different broker dealer but where securities bought or the funds from the securities sold are deposited (settled) into the clients Schwab or Fidelity account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, to minimize your trading costs, we have Schwab or Fidelity execute most trades for your account.

We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers. Although we are not required to execute all trades through Schwab or Fidelity, we have determined that having Schwab or Fidelity execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How we select brokers/custodians"). By using another broker or dealer you may pay lower transaction costs.

Products and services available to us from Schwab and Fidelity

Schwab and Fidelity provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab or Fidelity retail customers. Schwab and Fidelity also make available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab and Fidelity's support services are generally available on an unsolicited basis (we do not have to request them) and at no charge to us. Following is a more detailed description of Schwab's support services:

Services that benefit you.

Schwab and Fidelity’s brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab and Fidelity include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab and Fidelity's services described in this paragraph generally benefit you and your account.

Services that do not directly benefit you.

Schwab and Fidelity also make available to us other products and services that benefit us but do not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts and operating our firm. They include investment research, both Schwab and Fidelity s own and that of third parties. We use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab and Fidelity. In addition to investment research, Schwab and Fidelity also makes available software and 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

Block trades

In general, Financial Synergies will not block trades except when adding a new fund across client portfolios, eliminating a fund from all accounts, or changing the percentages of an allocation for many accounts, as applicable. When blocking trades, we trade an aggregate block of securities composed of assets from multiple client accounts. Depending on the security traded, failure to aggregate a trade may result in clients paying a different price for the same security on the same or a different trading day.

Financial Synergies' block trading policy and procedures are as follows:

1) Financial Synergies' policies for the aggregation of transactions shall be fully disclosed in this Form ADV.
2) Financial Synergies will not aggregate transactions unless it believes that aggregation is consistent with our fiduciary duty to our clients and is consistent with the terms of Financial Synergies 's investment advisory agreement with each client for which trades are being aggregated.
3) No advisory client will be favored over any other client; each client that participates in an aggregated order will participate at the average share price for all Financial Synergies' transactions in a given security on a given business day. Transaction costs will be based on the number of shares traded for each client (Schwab and Fidelity charge on an account-by-account basis).
4) Financial Synergies will prepare, before entering an aggregated order, a trade blotter specifying the participating client accounts and how it intends to allocate the order among those clients.
5) Financial Synergies' books and records will separately reflect, for each client account, the orders of which are aggregated, the securities held by, and bought and sold for that account.
6) Funds and securities of clients whose orders are aggregated will be deposited with one or more banks or broker-dealers, and neither the clients' cash nor their securities will be held collectively any longer than is necessary to settle the purchase or sale in question on a delivery versus payment basis; cash or securities held collectively for clients will be delivered out to the custodian bank or broker-dealer as soon as practicable following the settlement.
7) Financial Synergies will receive no additional compensation or remuneration of any kind because of the proposed aggregation; and
8) Financial Synergies' employees may participate in block trades with clients.

Client Directed Brokerage

Clients can direct Financial Synergies to use specific broker- dealer(s) for all or a portion of their account transactions. If a client directs us to use a specific broker-dealer, the price, commission rate, or transaction costs of its account transactions may be less favorable than our non-directed brokerage orders, and we may be unable to achieve the most favorable execution. Directing us to use a particular broker-dealer might also affect the timing of a client's transaction. There may be times when we may not trade with a client's directed broker- dealer until all non-directed brokerage orders are completed and this can result in the client's order being executed on less favorable terms than we obtain for non-directed orders and performance of such accounts may also differ.

Because client-directed trades often cannot be aggregated with non-directed trades, such designations may adversely affect Financial Synergies' ability to obtain volume discounts on aggregated orders or to obtain best price and execution by affecting certain transactions directly with the market maker.

ITEM 13 - REVIEW OF ACCOUNTS

Investment Management Services

While the underlying securities within Investment Management Services accounts are continuously monitored, these accounts are reviewed at least monthly by one or more members of the Investment Committee, which includes Heath Hightower, Bryan Zschiesche, Michael Minter, Will Goodson, and Kevin Nelson. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

Investment Management Services clients receive monthly statements and confirmations of transactions from their broker-dealer. In addition, Financial Synergies will provide quarterly reports summarizing account performance, balances, and holdings.

Held Away Account Services

We review these accounts daily as data is refreshed by the custodian. We provide quarterly statements showing account performance, balances and holdings as reported by the account custodian.

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

Referral Arrangements

FSWA does not compensate non-advisory personnel (solicitors or promoters) for client referrals outside of third-party referral programs described below.

Finder's Fees and Related Costs for FSWA

1) **Participation Fees**
   We receive client referrals from Charles Schwab & Co., Inc. ("Schwab) through participation in Schwab Advisor Network ("the Service"). The Service is designed to help investors find an independent investment advisor.

   Schwab is a broker-dealer independent of and unaffiliated with Financial Synergies. Schwab does not supervise Financial Synergies and has no responsibility for Financial Synergies' management of clients' portfolios or our other advice or services. Financial Synergies pays Schwab fees to receive client referrals through the Service.

   Financial Synergies pays Schwab a Participation Fee on all referred clients' accounts that are maintained in custody at Schwab and a Non-Schwab Custody Fee on all accounts that are maintained at, or transferred to, another custodian. The Participation Fee paid by Financial Synergies is a percentage of the value of the assets in the client's account. Financial Synergies pays Schwab the Participation Fee for so long as the preferred client's account remains in custody at Schwab. The Participation Fees are billed to Financial Synergies quarterly and may be increased, decreased or waived by Schwab from time to time. The Participation Fees are paid by Financial Synergies and not by the client. **Financial Synergies does not charge clients referred through the Service fees or costs greater than the fees or costs Financial Synergies charges clients with similar portfolios who were not referred through the Service.**

2) **Non-Schwab Custody Fees**

Financial Synergies would pay Schwab a Non-Schwab Custody Fee if custody of a referred client's account was not maintained by, or assets in the account were transferred from Schwab. The Non-Schwab Custody Fee is a one-time payment equal to a percentage of the assets placed with a custodian other than Schwab. The Non- Schwab Custody Fee is higher than the Participation Fees the Advisor generally would pay in a single year. Thus, the Non-Schwab Custody Fee route presents a conflict of interest because Financial Synergies has an incentive to recommend that client accounts be held in custody at Schwab.

The Participation and Non-Schwab Custody Fees are based on the amount of assets in accounts of Financial Synergies clients who were referred by Schwab and those referred clients' family members living in the same household. Thus, the Non-Schwab Custody Fee route presents a conflict of interest because Financial Synergies has an incentive to encourage household members of clients referred through the Service to maintain custody of their accounts at Schwab.

Economic Benefits

FSWA receives an economic benefit from Schwab and Fidelity in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab and Fidelity. In addition, Schwab and Fidelity have also agreed to pay for certain products and services for which we would otherwise have to pay once the value of our clients' assets in accounts at Schwab and Fidelity reaches a certain size. You do not pay more for assets maintained at Schwab and Fidelity as a result of these arrangements. However, we benefit from the arrangement because the cost of these services would otherwise be borne directly by us. You should consider these conflicts of interest when selecting a custodian. The products and services provided by Schwab and Fidelity, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices).

Indirect Compensation from Mutual Fund Companies

Financial Synergies receives some financial assistance from mutual fund companies with whom we have placed some client assets. This assistance is applied only to client events and seminars. Accepting these funds puts us in a conflict of interest with our clients, as we normally would pay for client events and seminars directly.

Thus, the receipt of this assistance presents a conflict of interest because Financial Synergies has an incentive to place client assets in these funds. We monitor this conflict in our regular reviews of client portfolios to ensure that they remain suitable and appropriate.

ITEM 15 - CUSTODY

Invoicing: Financial Synergies is deemed to have custody of the funds and securities due to its authority to make withdrawals from client accounts to pay its advisory fee. However, a surprise examination is not required because Financial Synergies has written authorization from each client to deduct advisory fees from the account held with the qualified custodian and each time a fee is directly deducted from a client account, we send the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account.

Standing Letters of Authority: Financial Synergies has been deemed to have inadvertent custody because of you providing us with Standing Letters of Authorization ("SLOA(s)") to withdraw funds from your portfolio account to pay third parties. Notwithstanding that, a surprise examination is not required as we are relying on the conditions set forth in the No-Action letter issued by the Securities and Exchange Commission on February 21, 2017. Pursuant to the conditions set forth in the No-Action Letter, Financial Synergies confirms that:

(1) you provide an instruction to the qualified custodian, in writing, that includes your signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed;

(2) you authorize us, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time;
(3) The custodian performs appropriate verification of the instruction, such as a signature review or other method to verify your authorization, and the custodian provides a transfer of funds notice to you promptly after each transfer;
(4) you have the ability to terminate or change the instruction to the custodian;
(5) we have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in your instruction;
(6) we maintain records showing that the third party is not a related party of Financial Synergies or located at the same address as Financial Synergies; and
(7) the custodian sends you, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

The Custodian maintains custody of the client's assets. Therefore, each client must select a custodian and may be required to pay custodian fees. Also, clients will incur brokerage and other transaction costs during our management of their accounts. Clients will receive account statements from one or more qualified custodians covering the funds and securities in their account(s). We encourage you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you.

ITEM 16 - INVESTMENT DISCRETION

Most of our Investment Management Services are provided on a discretionary basis, which means that we will place trades in a client's account as we deem appropriate based on the information previously gathered, without contacting the client prior to each trade to obtain the client's permission. Under these circumstances our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell.

Clients give us discretionary authority when they sign a discretionary investment management agreement with our firm (which grants us a limited power of attorney) and may reasonably limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

ITEM 17 - VOTING CLIENT SECURITIES

Without exception, we will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

ITEM 18 - FINANCIAL INFORMATION

Financial Synergies have no financial circumstances to report. Under no circumstances do we require or solicit payment of fees in excess of $1,200 per client more than six months in advance nor have we filed a bankruptcy petition at any time in the past ten years. Therefore, we are not required to include a financial statement with this brochure.

April 8, 2020, Financial Synergies received a Paycheck Protection Plan (PPP) Loan through the Small Business Administration (SBA) in conjunction with the relief afforded from the Coronavirus Aid, Relief, and Economic Security (CARES) Act. The firm used this loan to fund payroll for firm employees similarly situated in respective States where we are registered, and the firm has not experienced and does not anticipate any interruptions of service. The PPP Loan was forgiven on November 2, 2020, in accordance with the rules set forth by the SBA.

ITEM 19 – ADDITIONAL INFORMATION

Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure. We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees who need that information in order to provide products or services for you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, the trade error will be corrected in the trade error account of the executing broker-dealer, and you will not keep the profit.

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.