

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

Keeler & Nadler Family Wealth does not accept nor charge performance-based fees, which are fees based on a share of capital gains or capital appreciation of the assets in a Client's account or any portion thereof. All fees charged by the Keeler & Nadler Family Wealth are asset-based, flat or hourly.

## Item 7 - Types of Clients

Keeler & Nadler Family Wealth provides Financial Planning, Portfolio Management, and Retirement Plan Advisory and Pension Consulting Services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, endowments and other business entities.

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

### Item 8(a) Investment Policy and Implementation Procedures and Methods

While each Client situation is different, wherever possible Investment Advisor Representatives (IAR's) will take certain steps to ensure a uniform process for creating investment recommendations, implementing and monitoring those recommendations. Keeler and Nadler believes that over the long-term Clients should invest in equities where their risk tolerance would allow it. Over the long term, equities have proven to have had a higher risk-adjusted real return than bonds or cash. But each situation is unique, and requires special attention to the creation of each Client's portfolio.

Keeler & Nadler will construct portfolios consisting primarily of mutual funds and exchange-traded funds. Keeler & Nadler does not follow or recommend individual stocks, but will work around them if the Client already holds them, the Client specifically requests it, or their situation necessitates it. In general, Keeler & Nadler does not recommend individual stocks to its Clients.

From time to time, the Client's situation may indicate the use of some other type of product. This could include, for example, a variable annuity contract with an income rider. Due to the higher expenses of these types of products, Keeler & Nadler does not typically recommend these contracts. Clients that are looking for income guarantees in retirement and are unwilling to except investment risk may have the desire to pay the insurance company to shoulder this risk. If, after explaining the higher cost of these contracts to the Client, and the Client is willing to accept the higher cost in exchange for the insurance company taking the risk, Keeler and Nadler may implement various types of annuity products.

If the products or vehicles available through Keeler & Nadler's custodian/broker-dealer, Purshe Kaplan Sterling ("PKS") are found to have advantages over those available through Charles Schwab, the IAR may choose to purchase these vehicles for the Client though PKS. In most cases, however, investment business is directed through the custodian Charles Schwab.

Before creating a Client's portfolio, careful consideration is given to the asset allocation. Factors that determine a Client's asset allocation include the following variables:

- The Client's time horizon;
- The Client's investment objectives;
- The Client's liquidity needs;