

Odyssey Wealth Management, LLC

(Odyssey Wealth)

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July 21, 2017

**FORM ADV PART 2A
BROCHURE**

This brochure provides information about the qualifications and business practices of Odyssey Wealth. If you have any questions about the contents of this brochure, please contact us at 972-636-5037. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Odyssey Wealth is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Odyssey Wealth is 139943.

Odyssey Wealth is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Material Changes

At least annually, this section will discuss only specific material changes that are made to the Odyssey Wealth Management, LLC Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

Our last annual amendment occurred on March 27, 2017. Since that date, we made the following changes:

July 2017

- We revised our Brochure and Brochure Supplements to reflect our new address:
2500 N Dallas Parkway, Ste. 496, Plano, TX 75093.

A copy of our updated Brochure and Brochure Supplements is available to you free of charge and may be requested by contacting us at 972-636-5037.

Additional information about Odyssey Wealth is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD number for Odyssey Wealth is 139943. The SEC's website also provides information about any persons affiliated with Odyssey Wealth who are registered, or are required to be registered, as Advisory Representatives of Odyssey Wealth.

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Advisory Business

Form ADV Part 2A

Odyssey Wealth's registration was granted on April 18, 2006. Brent W. Little is Manager and principal owner of the firm.

The following paragraphs describe our services and fees. As used in this brochure, the words "we", "our", "us" and "firm" refer to Odyssey Wealth Management, LLC and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm. Also, you may see the term Associated Person throughout this brochure. As used in this brochure, our Associated Persons are our firm's officers, employees, and all individuals providing investment advice on behalf of our firm.

Financial Planning/Business Planning Services

Our firm offers financial planning services on an ongoing basis. Financial planning will typically involve providing a variety of services, principally advisory in nature, regarding the management of your financial resources based on an analysis of your individual needs. The topics frequently covered include retirement planning, investment advice on asset allocation and investment selections, risk management, tax planning, planning for children's and grandchildren's educations, gifting programs, wealth transfer planning, business tax and succession planning and estate planning. Financial planning services may include consultations and/or written plans that analyze your financial situation and make appropriate recommendations for strategies. Assistance with implementing the strategies may be provided as well.

Financial plans are based on your financial situation at the time the plan is presented and are based on financial information you disclose to Odyssey Wealth. You are responsible for providing complete and accurate information about your financial situation and circumstances. We advise clients that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performances of the market and economy. **Odyssey Wealth cannot offer any guarantees or promises that your financial goals and objectives will be met. As your financial situation, goals, objectives or needs change, you must notify Odyssey Wealth promptly.**

Asset Allocation and Third-Party Manager Selection and Monitoring Service

Our firm offers asset allocation and third-party manager selection and monitoring services in which we provide investment advice tailored to meet your individual investment needs. Our service involves an initial asset allocation of your investments into investments appropriate for your stated goals and objectives. Thereafter, we will monitor and review your portfolio either on an annual/bi-annual basis or on an event-driven basis as a result of a change in the economy or your personal situation.

We will recommend a third-party platform based upon an investment strategy we believe to be consistent with your financial needs, investment goals, risk tolerance, and stated investment objectives. We may exercise discretionary authority to approve a third-party manager's recommendations regarding changes to the asset allocation within your investment portfolio. We will follow an investment strategy that is consistent with your investment objectives when making any adjustments to your portfolio. Rebalancing and adjustments may be made whenever it is deemed necessary to maintain your investment objective. Once your portfolio is constructed, we provide advice on an intermittent or periodic basis such as upon your request, in response to a market event, or on a specific date (e.g., reviewed annually).

We may recommend the use of individual stocks and bonds in your investment portfolio through the use of Separately Managed Accounts, Unified Managed Accounts, or other third-party manager/sub-advisor accounts. We would recommend a third-party manager (sub-advisor) to you whose investment style/strategy is believed to be consistent with your financial needs, investment goals, and stated investment objectives. If one of these accounts is chosen as a strategy for your investment portfolio, a Manager's disclosure form is provided listing the Manager's fees associated with the separately managed account.

Please refer to Item 5, Fees and Compensation, for further information regarding the Third-Party Managers.

Tailored Advisory Services

Our firm tailors our advisory services to meet your individualized needs. Reviews are offered, typically annually or bi-annually dependent upon your situation, but more often if needed.

Client Assets Under Management

Our firm does not provide “continuous and regular supervisory or management services” and therefore does not have any reportable Client Assets Under Management. Rather, we provide financial planning and overall wealth management services with accounts being reviewed on a periodic basis.

Fees and Compensation

Financial Planning Fees

An initial planning fee will be determined based on your individual needs and planning complexity and is due before financial planning begins. The typical initial planning fee generally ranges between \$1,500–\$7,500. Your specific fee will be stated in your advisory contract.

An ongoing planning fee may also be determined and is also dependent upon your needs and complexity. The typical ongoing financial planning fee generally ranges between \$1,000–\$2,500 per quarter. This fee is billed quarterly in advance. Your specific fee will be stated in your advisory contract.

Business Planning Fees

Business planning services may be offered as a part of the financial planning process. This service has a separate fee which is dependent upon your business planning needs and complexity. The typical ongoing business planning fee generally ranges between \$1,000–\$2,500 per quarter. This fee is billed quarterly in advance. Your specific fee will be stated in your advisory contract.

Asset Allocation and Third-Party Manager Selection and Monitoring Service Fees

The fees for our asset allocation and third-party manager selection and monitoring services are billed quarterly in advance. If the service begins at any time other than the first day of a calendar quarter, the initial quarterly fee will be assessed pro-rata based on the prior quarter's ending portfolio value (or the most recent value provided by you if the quarterly statement is not accessible) and the effective date on your contract. The fee is based on a percentage of the assets under advisement by the third-party manager(s)/platform and typically ranges from ½ of 1% to 1.25% per year, depending on the size and complexity of the accounts.

This fee range is a guideline for the typical client strategy. Odyssey Wealth reserves the right to negotiate fees, higher or lower, depending on unique circumstances. The above fees apply to most client situations, however there may be exceptions. Minimum fees typically apply (usually \$7,500/year) and are determined by services provided. At our discretion, we may allow accounts of members of the same household to be aggregated for purposes of determining the advisory fee. We may allow such aggregation, for example, where the firm services accounts on behalf of minor children of current clients, individual and joint accounts for a spouse, and certain other types of related accounts. This consolidation practice is designed to allow clients the benefit of an increased asset base which could potentially enable the accounts to be assessed a reduced advisory fee based on the larger asset base.

Other Fees

Clients are advised that all fees paid to Odyssey Wealth for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds, ETFs, REITs, UITs, limited partnerships and third-party money managers. The fees for these investments may include a management fee and other internal expenses. Mutual fund fees are described in the fund's prospectus, which the custodian mails directly to the

client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's website. At your request, at any time, Odyssey Wealth will direct you to the appropriate Web page to access the prospectus.

In addition, the custodian may charge you a brokerage fee to purchase or sell securities, including mutual funds. Odyssey Wealth does **not** share in any brokerage fee that may be charged by the custodian.

We suggest you review all fees charged by the investment companies, Odyssey Wealth and the custodian to fully understand the total amount of fees you will pay.

Termination

You may terminate the client services agreement within 5 days of the date of acceptance without penalty to you. However, there will be a pro-rata charge for bona fide financial planning and/or consulting services rendered prior to such termination. After the 5-day period, either party may terminate the agreement by providing written notice to the other party. If there are any prepaid unearned fees, Odyssey Wealth will promptly refund the unearned fees to you. Any asset allocation/portfolio monitoring/third-party management service fee that has been earned for the current quarter will be pro-rated for the portion of the quarter in which the assets were advised before the cancellation notice was received.

Performance-Based Fees and Side-By-Side Management

Performance-based fees are fees that are based on a share of capital gains or capital appreciation of your account. We do not accept performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while managing accounts that are not charged performance-based fees. Our fees are calculated as described in the *Advisory Business* section above and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Types of Clients

We offer services to individuals, trusts, estates, charitable organizations, corporations and other businesses.

Methods of Analysis, Investment Strategies and Risk of Loss

The method of securities analysis we use is fundamental analysis, which refers to financial attributes of a company, such as revenue growth, debt-to-equity ratio, inventory turnover, etc.

Advice offered by Odyssey Wealth may involve investments in mutual funds, ETFs, REITs, UITs, limited partnerships and individual securities. When suitable, we may recommend the use of third-party separate managers for asset management services.

We do not represent, warrant, guarantee or imply that the services or methods of analysis we can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. **Past performance is no guarantee of future performance.** Market values of investments will always fluctuate based on market conditions. Clients are reminded that investing in any security entails risk of loss which they should be willing to bear.

Disciplinary Information

Neither Odyssey Wealth nor any of its associated persons have any reportable disciplinary information.

Other Financial Industry Activities and Affiliations

Brent Little, Manager, is a Certified Public Accountant (CPA) by training and education and he maintains the CPA license; however, he does not act in that capacity for purposes of providing tax return preparation or accounting services. Mr. Little does provide personal and business tax planning advice as a part of the client's financial planning process. For clients needing tax preparation and accounting services, OWM can facilitate the collection of information and refer you to a non-affiliated accounting firm.

We may also enter into direct relationships with third-party managers to provide appropriate investment advice and execution for your investment accounts (ex., separately managed accounts). In the event that another advisor is responsible for the implementation of some portion of your investment account, the arrangement and any fees associated with the arrangement will be fully discussed with you and will be appropriately disclosed.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Our firm has adopted a written Code of Ethics. This Code of Ethics discusses the required professional behavior imposed by us upon all associated persons and access persons. The governing principle by which our firm conducts business is that we are a fiduciary to our clients. As a fiduciary, we have a duty of care, loyalty, honesty and good faith to our clients. Compliance with this duty can be achieved by trying to avoid conflicts of interests and by fully disclosing all material facts concerning any conflict that does arise with a client. As a fiduciary, we must put our clients' interests before our own.

A copy of the firm's Code of Ethics is available to you and prospective clients upon request.

Our firm may recommend publicly traded securities to you which employees of our firm own in their personal accounts. At times our firm and our related persons may hold positions in securities that may also be recommended to our clients. However, at no time will we or any related person receive preferential treatment over clients. We enforce applicable rules including the prohibition against insider trading. Our firm's policy manual discusses Odyssey Wealth's policies and procedures regarding employee securities trades in their personal accounts. We maintain the required personal securities transaction and holdings records for all employees, which are reviewed on a quarterly basis to ensure compliance with our firm's policies.

Brokerage Practices

Broker Recommendations

If you desire, we will recommend a broker and this recommendation will be based on the broker's costs, skills, reputation, dependability and compatibility with the client. You may be able to obtain lower commissions and fees from other brokers. The value of products, research and services provided to us by the broker, if any, is not a factor in determining the selection of broker-dealers.

Research and Other Soft-Dollar Benefits

Our firm currently has no formal soft-dollar arrangements, where specific products or services are paid for with soft dollars generated for our firm by individual trades we place in client accounts. However, the custodian provides our firm with certain brokerage and research products and services that may qualify as "brokerage or research services" under Texas regulations.

Brokerage for Client Referrals

We do not receive referrals from a broker-dealer or third party providing service to our firm.

Review of Accounts

Your Advisory Representative will review your accounts following your financial plan or portfolio update, usually annually or bi-annually. Such reviews entail looking at the holdings in each of your portfolios in light of your investment objective. Although we encourage annual or bi-annual financial plan updates, clients may and often do defer their updates until they feel they have a need to meet. To address this situation, we may review your accounts more often. Events that may trigger a special review include a request by you or receipt of information from you of a substantial change in your financial circumstances or investment objectives or extraordinary market events.

You will receive written monthly or quarterly statements from your custodians, mutual funds and other money managers, as required. Other than the initial plan or analysis, most often no other reports will be issued. Generally, all recommendations will be made and discussed with you during our meetings.

Client Referrals and Other Compensation

Our firm does not receive any compensation from any third party in connection with providing investment advice to you nor does it compensate any individual or firm for client referrals.

Custody

Custody is defined as having access to your funds or securities. As paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our advisory fees, if you have authorized them to do so. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities.

Odyssey Wealth does not have physical custody of any your funds and/or securities. Your funds and securities are held with a bank, broker-dealer or other independent, qualified custodian. You will receive account statements from the independent, qualified custodian(s) at least quarterly. The account statements from the custodian(s) indicate the amount of advisory fees deducted from your account(s) each billing period. We suggest you carefully review account statements for accuracy.

Investment Discretion

We may have discretionary authority, under a limited power of attorney assigned to Odyssey Wealth, which means that we may exercise discretionary authority to approve a third-party manager's recommendations regarding changes to the asset allocation within your investment portfolio. We will follow an investment strategy that is consistent with your investment objectives when making any adjustments to your portfolio.

Voting Client Securities

We do not vote proxy statements on behalf of advisory clients. You may contact us about questions you may have and opinions on how to vote the proxies. However, the decision to vote and how you vote the proxies is solely up to you.

Financial Information

We do not charge any fees more than 6 months in advance. As such, no financial information is required to be included in this narrative. We are financially stable. There is no financial condition that is likely to impair our ability to meet our contract actual commitment to you or any other client.

Requirements for State-Registered Advisers

Neither our firm nor any of its associated persons are compensated for advisory services with performance-based fees. Please refer to the *Performance-Based Fees and Side-By-Side Management* section above for additional information on this topic.

Neither our firm nor any of its associated persons have any reportable arbitration claims, civil, self-regulatory organization proceeding or administrative proceeding.

Neither our firm nor any of its associated persons have a material relationship or arrangement with any issuer of securities.

Please refer to Part(s) 2B background information about management personnel and those giving advice on behalf of our firm.

Additional Information

Odyssey Wealth is entirely independent, does not share in any fees or commissions charged by any custodian, and does not accept compensation from any custodian.

Independent third-party custodians are used for all your investment accounts. The independent third-party custodian relationship is strictly between you and the custodian. Generally, Securities Investor Protection Corporation (SIPC) and certain private insurance provided by custodians are available to protect most of your accounts with the custodian. Nevertheless, if the custodian were to become financially insolvent you may be subject to risk of loss.

Odyssey Wealth cannot guarantee any custodian's financial situation or its ability to honor its commitments to its clients.

Business Continuity and Disaster Recovery Plan

Our firm has adopted a *Business Continuity and Disaster Recovery Plan* and will provide a copy to you or prospective client upon request.

Brent W. Little

Odyssey Wealth Management, LLC

(Odyssey Wealth)

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July 21, 2017

**FORM ADV PART 2B
BROCHURE SUPPLEMENT**

This brochure supplement provides information about Brent W. Little that supplements the Odyssey Wealth brochure. You should have received a copy of that brochure. Please contact Brent W. Little, Manager, if you did not receive Odyssey Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Brent W. Little is available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Brent W. Little is 4636957.

Educational Background and Business Experience

Form ADV Part 2B

Brent Wilson Little
Year of Birth: 1973

Formal Education:

B.A., Business Administration – Management, Texas Christian University, 1997
B.A., Business Administration – Finance and Accounting, Texas Christian University, 2000
Masters – Accounting, Texas Christian University, 2000

Business Background for the Previous 5 Years:

Odyssey Wealth Management, LLC (formerly Odyssey Wealth Management, LP),
Manager, 2006–Present
Brent W. Little, PC, President, 2004–2009

Professional Designations:

Certified Public Accountant (CPA), 2000
Certified Financial Planner (CFP®), 2003
Personal Financial Specialist (PFS), 2004

Certified Financial Planner (CFP®)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a 2-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real-world circumstances;
- Experience – Complete at least 3 years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year) and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every 2 years, including 2 hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Certified Public Accountant (CPA)

CPAs are licensed and regulated by their state boards of accountancy. Although state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least 1 year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA) and successful passage of the Uniform CPA Examination. To maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a 2-year period or 120 hours over a 3-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

Personal Financial Specialist (PFS)

The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's Code of Professional Conduct and is encouraged to follow AICPA's Statement on Responsibilities in Financial Planning Practice. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every 3 years. The PFS credential is administered through the AICPA.

Disciplinary Information

Mr. Little does not have any reportable disciplinary disclosure.

Other Business Activities

Mr. Little is not involved in any business activities outside of Odyssey Wealth Management, LLC.

Additional Compensation

Mr. Little does not receive any additional compensation from providing advisory services beyond that received as a result of his capacity as owner of Odyssey Wealth Management, LLC.

Supervision

As owner of Odyssey Wealth Management, LLC, Mr. Little is not supervised by others.

Brent W. Little, principal owner, Chief Compliance Officer, and Advisory Representative, supervises all activities conducted through Odyssey Wealth Management, LLC. He maintains policies and procedures to guide his activities and adheres to a Code of Ethics. Brent's contact information may be found on the Cover Page of this Brochure Supplement.

Requirements for State-Registered Advisers

Mr. Little has not been involved in any arbitration claim or civil, self-regulatory organization, or administrative proceeding involving an investment or investment-related business or activity, fraud, false statement(s), or omissions, theft, embezzlement, or other wrongful taking of property, bribery, forgery, counterfeiting, or extortion, or dishonest, unfair, or unethical practices.

Additionally, he has not been the subject of a bankruptcy petition.

Allen G. Kozel

Odyssey Wealth Management, LLC

(Odyssey Wealth)

2500 N Dallas Parkway, Ste. 496, Plano, TX 75093

Phone: 972-636-5037

Fax: 866-636-1119

Web Site: www.odysseywealth.com

July 21, 2017

**FORM ADV PART 2B
BROCHURE SUPPLEMENT**

This brochure supplement provides information about Allen G. Kozel that supplements the Odyssey Wealth brochure. You should have received a copy of that brochure. Please contact Brent W. Little, Manager, if you did not receive Odyssey Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Allen G. Kozel is available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Allen G. Kozel is 5975930.

Educational Background and Business Experience

Form ADV Part 2B

Allen Gerard Koziel
Year of Birth: 1985

Formal Education:

B.S., Personal Financial Planning, Texas Tech University, 2007

Business Background for the Previous 5 Years:

Odyssey Wealth Management, LLC; Associate Planner, 2015–Present; Investment Adviser Representative
2016–Present

First Allied Securities, Inc., Registered Representative, 2011–2015

First Allied Advisory Services, Inc., Investment Adviser Representative, 2014–2015

Professional Designations:

Certified Financial Planner (CFP®), 2014

Certified Financial Planner (CFP®)

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The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a 2-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real-world circumstances;
- Experience – Complete at least 3 years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year) and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every 2 years, including 2 hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field and

• Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Disciplinary Information

Mr. Kozel does not have any reportable disciplinary disclosure.

Other Business Activities

Mr. Kozel is not involved in any business activities outside of Odyssey Wealth Management, LLC.

Additional Compensation

Mr. Kozel does not receive any additional compensation from providing advisory services beyond that received as a result of his capacity as an investment adviser representative of Odyssey Wealth Management, LLC.

Supervision

Brent W. Little, principal owner, Chief Compliance Officer, and Advisory Representative, supervises all activities conducted through Odyssey Wealth Management, LLC. He maintains policies and procedures to guide his activities and adheres to a Code of Ethics. Mr. Little's contact information may be found on the Cover Page of this Brochure Supplement.

Requirements for State-Registered Advisers


Mr. Kozel has not been involved in any arbitration claim or civil, self-regulatory organization, or administrative proceeding involving an investment or investment-related business or activity, fraud, false statement(s), or omissions, theft, embezzlement, or other wrongful taking of property, bribery, forgery, counterfeiting, or extortion, or dishonest, unfair, or unethical practices.

Additionally, he has not been the subject of a bankruptcy petition.

Asset Dedication, LLC

(A Registered Investment Adviser)

Disclosure Brochure
Updated March 2017



This brochure provides information about the investment advisory business and employee backgrounds of Asset Dedication, LLC. If you have any questions about the contents of this brochure, please contact **Brent Burns at (866) 535-0897**. 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.

Additional information about Asset Dedication can be found on the Internet at www.adviserinfo.sec.gov, or by searching for “Asset Dedication, LLC”, or the Firm’s CRD number, which is **151988**.

Registration as an investment advisor does not imply a certain level of skill or training.

220 Montgomery Street, Suite 450
San Francisco, CA 94104
866-535-0897
www.assetdedication.com

Item 2 – Material Changes

Since the last annual update was filed in March 2016, there are no material changes to our brochure.

Asset Dedication may provide additional disclosure information when deemed material.

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Item 4 – Advisory Business

Description of Advisory Firm

Asset Dedication, LLC (Asset Dedication) is an investment advisor registered with the United States Securities and Exchange Commission (“SEC”) and is a Limited Liability Company formed under the laws of the State of Delaware. Headquartered in San Francisco, California, Asset Dedication was founded by Steve Huxley and Brent Burns, and has been registered as an investment advisor since 2002. The Firm is owned and operated by Steve Huxley, Chief Investment Strategist (31.7% owner); Brent Burns, President and Chief Compliance Officer (31.7% owner); Jeremy Fletcher (18.3% owner); and Dan Yeoman (18.3% owner).

Description of Advisory Services

Asset Dedication offers investment management and financial planning services (“Financial Planning”) using the Asset Dedication® strategy. The Asset Dedication® strategy seeks to achieve a client’s long-term goals by synchronizing equity securities with investment-grade fixed income securities that match the client’s cash flow needs.

Asset Dedication provides sub-advisory investment management services to clients of unaffiliated investment advisors (“Unaffiliated Advisors”) who have contractually engaged with Asset Dedication. Asset Dedication also provides advisory investment management and financial planning services through Investment Advisor Representatives of Asset Dedication, (“Affiliated Advisors”). Unaffiliated Advisors and Affiliated Advisors may be referred to collectively in this document as Advisors (“Advisors”). Asset Dedication only provides Financial Planning services when a client is working with an Affiliated Advisor.

Clients who engage in Asset Dedication’s services will work with an Advisor who will provide financial planning services specific to the client. Financial Planning can be described as helping individuals determine and set their long-term financial goals, through investments, tax planning, asset allocation, risk management, retirement and estate planning, and other areas.

Working with Asset Dedication

The following process is applicable to Asset Dedication’s management of client assets:

1. **Investment Advisory Agreement** – Prior to Asset Dedication providing investment management services, the end-client and/or the Advisor will be required to enter into a formal agreement with Asset Dedication, setting forth the terms and conditions under which assets will be managed. The investment advisory agreement may authorize the broker-dealer/custodian to debit the account for the amount of Asset Dedication’s investment management fee and to directly remit that management fee to Asset Dedication;
2. **Custodial (Separate Account) Agreement** – Prior to Asset Dedication providing investment management services, the end-client will be required to enter into a separate account custodial/clearing agreement with the broker-dealer/custodian (“custodian agreement”) in order for the broker-dealer/custodian to custody the client’s account assets. The custodian agreement may authorize the broker-dealer/custodian to debit the account for the amount of Asset Dedication’s investment management fee and to directly remit that management fee to Asset Dedication;

3. **Financial Planning** – Before having Asset Dedication manage an account for a client, the client's Advisor will obtain information sufficient to determine the client's financial situation and investment objectives;
4. **Portfolio Based on Client's Plan** – The Advisor will direct Asset Dedication to implement a portfolio strategy that they determine is the best fit for the client's financial plan;
5. **No Verification of Information** - In performing its services, Asset Dedication is not required to verify any information (such as investment objectives and limitations) received from the client, their Advisor, or other professionals; and Asset Dedication is authorized to rely on the information provided;
6. **Annual Contact with Advisor** - At least annually, the client's Advisor, shall contact the client to evaluate whether the client's financial situation or investment objectives have changed, or if they want to modify or impose any reasonable restrictions on the management of the client's account(s);
7. **Consultation Available** - Asset Dedication and the client's Advisor shall be reasonably available to consult with the client relative to the status of their account(s);
8. **Changes to Financial Situation** - It is the client's and/or their Advisor's responsibility to advise Asset Dedication when the client's financial situation or investment objectives have changed;
9. **Quarterly Statement from Custodian** – The client shall be provided with a statement, at least quarterly, that is prepared by the custodian and directly delivered from the custodian. That statement shall contain a description of all trade activity in the client's account(s) during the preceding period;
10. **Termination** -- The investment advisory agreement between Asset Dedication and the client and/or Advisor will continue in effect unless terminated by either party by written notice in accordance with the terms and conditions of the investment advisory agreement. Any investment management fee shall be prorated through the date of termination.

Types of Investments

Asset Dedication provides investment strategies using the following types of securities:

- U.S. government and agency bonds, including inflation-indexed bonds
- Investment-grade municipal bonds
- Investment-grade corporate bonds
- Equity securities (i.e. stocks)
- Exchange traded funds (ETFs)
- Mutual fund shares
- Certificates of deposit
- Money market mutual fund shares for cash equivalent positions

We generally do not provide advice on warrants, commercial paper, variable life insurance, variable annuities, options contracts on securities or commodities (other than index-based mutual fund), futures contracts on tangibles or intangibles, or interests in partnerships investing in real estate, oil and gas interests or hedge funds and other types of private (i.e. non-registered) securities.

Client Assets Managed by Asset Dedication, LLC

The amount of client assets managed by Asset Dedication totaled \$594,526,335 as of January 31, 2017, and managed on a discretionary basis.

Item 5 – Fees and Compensation***Fee Schedule***

Asset Dedication charges clients an investment management fee based upon a percentage of the market value of the assets being managed by Asset Dedication. The annual investment management fee rate charged will vary depending upon the market value of assets under management and the specific type of investment management services and strategy selected.

- For clients of Unaffiliated Advisors that do not have us manage the custodial paperwork process, the maximum investment management fee is 0.35%.
- For clients of Unaffiliated Advisors that have us manage the custodial paperwork process, the maximum investment management fee is 0.45%.
- For clients of Affiliated Advisors, the maximum fee schedule is 1.85% of assets under management. Affiliated Advisors may charge clients additional flat fees for financial planning and other services in addition to or in lieu of the investment management fees.

Investment management fees are negotiable, subject to volume discounts, and may be modified on a case-by-case basis.

Fees are usually payable at the beginning of each quarter, commonly referred to as *in advance*, and deducted directly from the client's account. As an accommodation, Asset Dedication may bill the client's account at the end of the quarter, commonly referred to as *in arrears*, if that is the agreement with the client's Advisor.

Asset Dedication uses the value of each account on the first day of the quarter to calculate the quarterly fee. Fees for the initial quarter are pro-rated based upon the number of days that services are provided.

The client's Advisor may charge investment management fees that are different from other Advisors that use the services of Asset Dedication. Variations in Advisor compensation may be due to the level of services the Advisor provides to the client. Such arrangements, and the terms and conditions thereof, are determined between the client and their Advisor.

Payment of Fees

Asset Dedication is responsible for the calculation of its portion of the management fees it charges. Management fees are paid via one of the following three ways:

1. Asset Dedication bills the client's account(s) for its management fees, and the payment is debited from the client's account(s) by the custodian, and then sent to Asset Dedication by the custodian.
2. Asset Dedication bills the client's account(s) for its management fees, as well as the Advisor's fees, and the payment is debited from the client's account(s) by the custodian, and then sent to Asset Dedication by the custodian. Asset Dedication then sends the Advisor's portion of the management fees to the Advisor.
3. The client's Advisor bills the client's account(s) or invoices the client for its management fees, as well as Asset Dedication's fees. The Advisor then send Asset Dedication's portion of the management fees to Asset Dedication.

Other Costs of Investing

- ✓ In addition to Asset Dedication's investment management fee, each client's Advisor charges advisory or other related fees.
- ✓ Clients with assets held in mutual fund shares and exchange traded funds (ETFs) will be charged expenses that include mutual fund management fees and potential other fund expenses.
- ✓ Clients are charged by their account custodian for transactions in their account(s). These charges may come in the form of commissions, mark-ups, and redemption fees. Clients may also be charged fees and expenses for certain types of accounts, such as IRA and other qualified retirement plan fees.
- ✓ Asset Dedication does not receive any portion of the brokerage commissions or transaction fees charged, or any of the fees assessed by the third-parties listed above.

Item 6 – Performance-based Fees

Asset Dedication does not charge or accept performance-based fees. For example, Asset Dedication does not share in capital gains or capital appreciation of the assets held within a client's account(s).

Item 7 – Types of Clients

Asset Dedication services the following types of clients:

- Individuals
- Trusts, Estates or Charitable Organizations
- Small Institutions

Affiliated Advisors may have minimum asset size requirements in order to service accounts.

Item 8 – Methods of Analysis and Investment Strategies

Asset Dedication utilizes the Asset Dedication® approach as explained in the book "Asset Dedication" (McGraw Hill, 2005) written by Stephen Huxley and Brent Burns, Asset Dedication's Chief Investment Strategist and President/Chief Compliance Officer, respectively. This approach is based on the principle of cash-matching a client's income needs using fixed income securities.

Asset Dedication primarily uses an asset class-based approach to investment analysis. Asset class-based analysis is a method of evaluating assets based on their type (stocks, bonds, commodities, REITs), and other risk factors including size (market capitalization) and style (value or growth). In other words, portfolios are constructed based on the long-term expected return characteristics of the underlying asset class. Each asset class is designed to be broadly diversified to reduce risks associated with individual issues. Asset classes are over or underweighted relative to the broad market to adjust the long-term return characteristics of the portfolio.

Our investment approach is long-term in nature which means clients should expect to hold a portfolio of securities over a number of years that is based on the client's long-term investment plans.

Risks of Investing

Clients must understand that past performance is not indicative of future results. Therefore, current and prospective clients should not assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds) involves the

risk of loss. Further, depending on the different types of investments, there may be varying degrees of risk. Clients and prospective clients should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, Asset Dedication does not represent, guarantee, or imply that its services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated when investing in securities that include:

Market and Liquidity Risks. Where the portfolio needs to be liquidated at a point when interest rates have risen, causing prices to fall for the bond portion of the portfolio, or prices have fallen for the stock portion of the portfolio. In addition, stocks, bonds, and ETFs may have a wide (bid-ask) spread between the current price at which the sellers are willing to sell the security and the price at which buyers are willing to buy the security.

Planning Risk. Where the actual cash flows needed by the client exceed the cash flows planned in the portfolio, which can lead to unsustainable withdrawal rates and may expose the portfolio to market risk as described above

Fixed Income Risks. When investing in bonds, there is the risk that issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors often receive set, regular payments that face the same inflation risk.

Interest Rate Risk. Although the Asset Dedication Income Portfolio is designed to hold individual bonds to maturity, if clients need to sell individual bond holdings before maturity and interest rates have risen, the bonds will likely lose value.

Equity (Stock) Market Risks. Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater price volatility than if you held preferred stocks and debt obligations of the issuer.

Individual Company Risks. When investing in stock and bond positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.

ETF and Mutual Fund Risks. Owning Exchanged Traded Funds (ETFs) or mutual funds generally reflects the risks of owning the underlying securities holdings in the ETFs or mutual funds. When investing in ETFs or mutual funds, clients incurs expenses based on the pro rata share of the ETFs' or mutual funds' operating expenses, and may also incur brokerage costs.

Management Risk of Investment Advisor. An investment varies with the success and failure of the Investment Advisor's investment strategies, research, analysis and determination of portfolio securities. If the investment strategies do not produce the expected returns, the value of the investment will decrease or lag an appropriate investment benchmark.

Item 9 – Disciplinary Information

There are no legal or disciplinary events that are material to the Firm or its employees.

Item 10 – Industry Activities and Affiliations

Asset Dedication is an independent investment advisory firm and only provides investment advisory services. The Firm is not engaged in any other business activities and offers no other services than those described in this Disclosure Brochure.

When requested, Asset Dedication may refer clients to Advisors for financial planning or other investment related services. Asset Dedication does not receive any compensation for these referrals from Advisors.

Asset Dedication is not and does not have a related company that is a (1) broker/dealer, municipal securities dealer, government securities dealer or broker, (2) investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund), (3) other investment adviser or financial planner, (4) futures commission merchant, commodity pool operator, or commodity trading advisor, (5) banking or thrift institution, (6) accountant or accounting firm, (7) pension consultant, (8) real estate broker or dealer, (9) sponsor or syndicator of limited partnerships, (10) insurance company, or (11) law firm.

Independent Insurance Agents

Some of Asset Dedication’s affiliated investment advisor representatives are licensed as insurance agents and can provide insurance services to clients. Clients are under no obligation to purchase insurance products through our investment advisor representatives. However, when acting as an insurance agent, our investment advisor representatives can help you purchase insurance products and will receive separate compensation (i.e. insurance commissions) in addition to the investment management fees charged through Asset Dedication. Clients that choose to purchase insurance products should be aware our investment advisor representatives will generally only recommend insurance products of those companies for whom the investment advisor representative is a sales agent and with which he/she is familiar with the benefits, exclusions and other terms.

Because our investment advisor representatives will receive commissions for selling insurance products, there is a conflict of interest in that our representatives may recommend policies to clients that do not require or need insurance. To address this potential conflict, and consistent with the Firm’s fiduciary duty, affiliated investment advisor representatives who are registered insurance agents are instructed to only recommend insurance products to those clients who need new or additional policies.

Item 11 – Code of Ethics

Asset Dedication has established a Code of Ethics that apply to all of its associated persons. An investment adviser is a fiduciary that has a responsibility to all clients to provide fair and full disclosure of all material facts and to act solely in the best interests of its clients at all times. This fiduciary duty is considered the core underlying principle for the Code of Ethics which also covers Insider Trading and Personal Securities Transactions Policies and Procedures. Asset Dedication requires its associated persons to conduct business in an honest, ethical and fair manner that is consistent with high levels of ethical standards, and with applicable federal and state securities laws. Asset Dedication has the responsibility to make sure that the interests of its clients are placed ahead of the Firm and its associated

persons' interests. Asset Dedication strives to avoid circumstances that might affect the duty of loyalty to clients. If a client wishes to review the Firm's Code of Ethics, a copy will be provided upon request.

Participation or Interest in Client Transactions

An officer of Asset Dedication is affiliated with an employee union of a non-profit institution. The institution has entered into a client relationship with Asset Dedication.

Item 12 – Brokerage Practices

Clients who wish to work with Asset Dedication can select a broker/dealer that has a business relationship with Asset Dedication. Generally, clients will select a broker/dealer to custody their accounts based on a conversation with their Advisor.

Asset Dedication seeks the best execution possible for our clients' accounts, given all available facts and circumstances. While quality of execution at the best price is an important determinant, best execution does not necessarily mean lowest price and it is not the sole consideration. Therefore, we cannot promise or guarantee that we will obtain the lowest trading prices available in the market at the time of the transaction. Clients and Advisors who direct the use of a particular broker/dealer may receive less favorable prices than would otherwise be the case if clients had not designated a particular broker/dealer. When appropriate Asset Dedication makes effort to place clients' trades at or about the same time. However, trades with any one broker/dealer may be placed before or after trades that are placed with other broker/dealers.

While Asset Dedication attempts to be flexible with the broker/dealers selected by the client, the broker/dealer's trading platform needs to be able to integrate into Asset Dedication's operational, trading and compliance systems. The trading process of any broker/dealer used must be efficient, seamless, and straightforward. To that end, Asset Dedication may suggest which broker/dealers' systems are easily integrated with our systems. Overall custodial support services, trade correction services, and statement preparation are some of the other factors to be considered when selecting a broker/dealer.

Asset Dedication utilizes the services of institutional trading and custody platforms, including:

- Schwab Institutional for which Charles Schwab & Company, Inc. serves as the broker/dealer and qualified custodian;
- TD Ameritrade Institutional for which TD Ameritrade serves as the broker/dealer and qualified custodian; and
- Fidelity Investments Wealth Management for which National Financial Services, LLC serves as broker/dealer and qualified custodian; and

Asset Dedication is not affiliated with any broker/dealer or other custodian. Custodian platforms allow Asset Dedication access to institutional trading, custody services, 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. Custodian services generally are available to independent investment advisors at no charge to them so long as a minimum threshold of the Asset Dedication's clients' assets are maintained in accounts through the platform and are not otherwise contingent upon Asset Dedication committing to the provider any specific amount of business (i.e. trading).

The custodians that have a business relationship with Asset Dedication do not charge separately for custody services for our clients for whom the Custodians have custody. Rather, the Custodians are compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through the respective broker/dealer or that settle into the broker/dealer's accounts.

The Custodians also make available to Asset Dedication, other products and services that benefit Asset Dedication, but may not benefit clients. Some of these other products and services assist us in managing and administering Client accounts. These include software and other technology that provide access to Client account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information and other market data; facilitate payment of our fees from our 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 our accounts, including accounts not maintained at the particular broker/dealer. Custodians also make available other services intended to help Asset Dedication manage and further develop our business. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. Receipt of these services and benefits may create an incentive for us to recommend broker/dealers based on those services and benefits. Asset Dedication does not receive referrals from any broker/dealer.

Trade Errors

Asset Dedication has implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with our fiduciary duty, it is our policy to correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client will be responsible for any loss resulting from the correction. In situations where the client did not cause the trade error, the client will be made whole and any loss resulting from the trade error will be absorbed by Asset Dedication if the error was caused by the Firm. If the error is caused by the broker/dealer or an Unaffiliated Advisor, the broker/dealer or Unaffiliated Advisor will be responsible for covering the costs of the error. Depending on the specific circumstances of the trade error, the client may not be able to receive any resulting gains as it may not be permissible for clients to retain the gain. Asset Dedication may confer with clients or the Advisor to determine if the client should forego any gain (e.g., due to tax reasons). Asset Dedication shall not profit from trade errors.

Aggregation of Client Orders – Block Trading Policy

Transactions implemented for client accounts are generally executed independently, unless the Firm decides to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading, or block trading and is used by the Firm when it believes such action may prove advantageous to clients. When we aggregate client orders, the allocation of securities among client accounts will be done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates, to allocate orders among clients on an equitable basis, and to avoid differences in prices and transaction costs that might be obtained if orders were placed independently. Under this process, transactions are averaged as to price and will be allocated among the Firm's clients in proportion to the purchase and sale orders placed for each client account on any given day. Asset Dedication does not receive any additional compensation as a result of aggregation.

Item 13 – Account Reviews

Accounts are reviewed on an on-going basis to ensure that accounts are managed in a manner that is consistent with the client's investment policy statement and other conditions that are specified by the client's Advisor. Reviews are performed under the direction of the management of the Firm.

Statements and Reports

Client accounts are maintained by third-party custodians who provide clients with monthly or at least quarterly account statements.

Asset Dedication uses performance reporting services provided by Tamarac, a third-party information provider ("Information Provider"). If requested by the client or Advisor, Asset Dedication will provide an electronic performance report for the client's account(s).

Asset Dedication does not guarantee or certify the accuracy, completeness, timeliness or correct sequencing of the information made available through Information Providers. All such Information is provided as-is and as-available.

Item 14 – Client Referrals

Asset Dedication has business relationships with Advisors that refer or recommend Asset Dedication® investment management services to their clients. At the time of introducing Asset Dedication to a client, the Advisor shall disclose the business relationship between Asset Dedication and the Advisor, and shall provide each prospective client with a copy of this Disclosure Brochure.

The Advisor maintains the direct client relationship and serve as a communication conduit between Asset Dedication and the underlying client. Asset Dedication will rarely, if ever, have direct communications with the underlying Client of an Advisor.

From time to time, we may refer potential clients (such as someone who read Asset Dedication's book) to Advisors. The expectation is that the Advisors may consider that the prospective clients use the services of Asset Dedication. Asset Dedication does not receive a referral fee for referring clients to Advisors.

Other Compensation

Please see the section entitled **Item 10 – Industry Activities and Affiliations** for a description of the compensation that independent Insurance Agents may receive.

Item 15 – Custody

Asset Dedication does not have custody of client's funds or securities, except for authorized management fee withdrawals. Client's funds and securities will be held at custodial broker/dealers (the "Custodian"), who will send monthly or quarterly account statements directly to the client.

Clients should carefully review those statements. In the event that Asset Dedication sends reports to the client, the client should compare the reports against account statements received from the custodian. When clients have questions about their account statements, they should contact Asset Dedication and/or the Custodian.

Item 16 – Investment Discretion

When Asset Dedication is given discretion, Asset Dedication implements trades on a discretionary basis, which means Asset Dedication will have the authority to determine the type of securities and the amount of securities that can be bought or sold for the client's portfolio without obtaining the client's consent for each transaction.

Clients may add reasonable restrictions on the types of investments that may be purchased in an account. Clients may also place reasonable limitations on the discretionary power granted to our Firm so long as the limitations are specifically set forth in writing or included as an attachment to the client agreement.

Item 17 – Voting Client Securities

Asset Dedication does not accept authority to vote client securities. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by clients shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to client's investment assets. Clients will receive their voting proxies or other solicitations directly from the custodian, unless otherwise directed by the clients.

For accounts managed by an Unaffiliated Advisor, the proxy voting is dictated by the Advisor, as outlined in their ADV. If a client has questions on any particular proxy or solicitation, they should contact their Advisor.

Item 18 – Financial Information

Asset Dedication does not require or solicit prepayment of fees six months or more in advance.

Asset Dedication is not subject to any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. The Firm has not been the subject of a bankruptcy petition.