



Trusted Contact Person Disclosure

As part of our responsibilities as an SEC-Registered Investment Adviser, we request that you provide the name and contact information of a Trusted Contact Person (TCP). Providing a TCP is voluntary but strongly encouraged.

Purpose of a Trusted Contact Person

A Trusted Contact Person allows us to better protect your financial interests, especially if we detect warning signs of:

- Possible financial exploitation,
- Diminished mental capacity, or
- Difficulty contacting you after multiple attempts.

The TCP acts as an additional resource to help us confirm your current contact information, and your health or well-being as it relates to your ability to manage your finances, especially if we detect unusual account activity.

What We *May* Discuss with a Trusted Contact Person

If we have a reasonable belief that financial exploitation, diminished capacity, or another client-protection issue may be occurring, we may contact your Trusted Contact Person to:

- Confirm your contact information (e.g., if we cannot reach you),
- Verify your current health or mental capacity as it relates to your ability to make financial decisions,
- Discuss concerns about possible elder or dependent-adult financial abuse,
- Assist in identifying an authorized legal representative (e.g., an agent under a power of attorney or trustee).

We will not share account balances, investment details, or other non-public personal information, unless you have separately authorized us to do so or such disclosure is otherwise permitted by law.

California-Specific Legal Considerations

California has strong protections for older and dependent adults, including the Elder Abuse and Dependent Adult Civil Protection Act (Welfare & Institutions Code §15600 et seq.).

Under this framework:

- Financial exploitation of anyone age 65 or older, or a dependent adult age 18–64 with significant limitations, is explicitly prohibited.
- Financial professionals in California are permitted (and in some cases encouraged) to contact third parties or take protective action when financial abuse is suspected.
- California law allows firms to share information with a “trusted person” or relevant agencies when reasonably necessary to prevent or respond to suspected financial exploitation.

Providing a TCP helps us meet our responsibilities under California law by enabling us to quickly involve a trusted person if protective action is warranted.

No Legal Authority Granted

Naming a Trusted Contact Person:

- Does NOT give the TCP any authority to make investment decisions, direct transactions, or access your accounts.
- Does NOT create a power of attorney, legal agency, or trading authorization.
- Does NOT allow the TCP to remove funds or act on your behalf.

The TCP’s role is solely supportive and informational.

Updating Your Trusted Contact Person

You may add, remove, or update your Trusted Contact Person at any time by notifying us in writing.

We encourage periodic review, especially after major life events (marriage, divorce, illness, or death of a loved one).

California

Effective January 1, 2020, in the State of California reporting is mandated per Cal. Wel. & Inst. Code §15630.2(b) for a broker-dealer or investment advisor who has direct contact with the adult or who reviews or approves the adult's financial documents, records, or transactions, and who, within the scope of their employment of professional practice, has observed or has knowledge of an incident that is directly related to the transaction that reasonably appears to be financial abuse, or who reasonably suspect that abuse, based solely on the information before them at the time of reviewing or approving the document, record, or transaction, to immediately or as soon as practicably possible report the known or suspected instance of financial abuse to the local adult protective services agency, the local law enforcement agency, and the Department of Business Oversight at 866-275-2677 (the "Agencies"). The report can be made by telephone or through a confidential internet reporting tool. If reported by telephone, a written report shall be sent, or an internet report shall be made through the confidential internet reporting tool, within two working days. The online form is available on:

<https://www.cdss.ca.gov/Portals/9/FMUForms/Q-T/soc342.pdf?ver=2017-05-03-163352-270>

The firm is authorized not to honor a power of attorney described in Division 4.5 (commencing with section 4000) of the Probate Code as to an attorney-in-fact, if the firm makes a report to an adult protective services agency or a local law enforcement agency of any state that the principal may be subject to financial abuse, as described in this chapter or as defined in similar laws of another state, by that attorney-in-fact or person acting for or with that attorney-in-fact.

Per Cal. Wel. & Inst. Code §15630.2(j), the firm may place a temporary hold if the firm:

- Reasonably believes, after initiating an internal review, that a disbursement or transaction may result in financial abuse;
- Continues its internal review as necessary; and
- Reports any relevant updates of the internal review to the Agencies.

Written notification with the reason for the hold must be made immediately, but not later than two business days, after the hold, to all parties authorized to transact business on the account, and the Agencies.

The temporary hold may last up to 15 business days provided:

- The firm's ongoing, internal review supports its initial belief of financial exploitation; and
- The hold is not terminated before then by the Agencies or court order. If the firm seeks to terminate the hold prior to 15 business days, it must consult with the Agencies and receive no objection.