



## **My Fiduciary Oath to My Clients**

A fiduciary is an individual, corporation, or association holding assets for another party, often with the legal authority and duty to make decisions regarding financial matters on behalf of the other party.

### **I am a Fiduciary**

I am a fiduciary financial advisor. My clients place their trust and confidence in me. As a professional and fiduciary I will never betray the trust and confidence my clients bestow in me. My fiduciary obligation to my client is paramount and supersedes any obligations I may owe to my firm or to the products manufacturers that my firm may represent.

### **I shall act with due care**

- At all times I will exercise due care and provide prudent advice
- I am knowledgeable as to the advice I provide.
- I follow a prudent process and at each step exercise good judgment.
- Any investment strategy I promote is based upon my objective analysis.
- The process I use to recommend an investment strategy is either substantiated by extensive back test or posses a strong academic support. If neither is present and my investment strategy is novel, I disclose this fact to my client along with all of the risks of the strategy.
- I carefully assess the circumstances and objectives of each client, both at the outset of the relationship and periodically throughout its term.
- I can claim neither prescience nor omniscience. I am not a guarantor of my client's returns.

### **I shall act with loyalty and utmost good faith toward my client**

- I affirmatively disclose all material facts to my client- i.e. any fact with might affect my client's decision- in a manner which ensures client understanding.
- At all times I act with utmost good faith toward my clients; with perfect candor, openness, and honestly, avoiding any concealment or deception.
- I disclose all of the fees and costs of any investment or insurance product I recommend, which total fees and costs I have ascertained, or at least estimated, through my due diligence.
- I seek to avoid material conflicts of interest with my client. While conflicts of interest are not prohibited under my duty to act in my client's best interest, I recognize that each conflict of interest may erode the trust and confidence of my client. I recognize that certain conflicts of interest might be so egregious that the relationship of trust and confidence with my client would cease to function. These must especially be avoided.
- When co conflicts of interests exist, I provide specific disclosures of the conflicts of interest and it's ramification for the client.
- I disclose, in advance, all fees and other compensation either my firm or I receive in connection with any proposed transaction.
- I recognize that mere casual disclosures, such as "there are other facts with may interest you, which can be found over there," are wholly inadequate to meet my obligation to the client. I ensure that my clients actually receive and review all of the disclosures provided.
- I also recognize that, regardless of the form of my compensation, and despite my efforts to avoid conflicts of interest, I will always posses some remaining conflicts of interest with my client. For these remaining conflicts I will obtain my clients informed consent.
- I will never, by undue influence, induce my client's consent.
- I will always properly manage any remaining conflict of interest to ensure that the transaction remains at all times fair and reasonable to the client. I realize that no client would ever provide informed consent to a proposed transaction that is not in that client's best interests.