

**FORM ADV PART 2A
FIRM BROCHURE**

Servus Capital Management, LLC

1922 Graves Mill Road, Upper Level
Lynchburg, VA 24502

Main Phone Number: (434) 316-0246

Toll Free Phone Number: (866) 396-6861

Fax Number: (866) 797-6711

www.ServusCM.com

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This brochure provides information about the qualifications and business practices of Servus Capital Management, LLC. If you have any questions about the contents of this brochure, please contact us at (434) 316-0246 or at allan.malina@servuscm.com. 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 Servus Capital Management is also available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by using a unique identifying number known as the CRD number. The CRD number for Servus Capital Management is 150195. This brochure also provides information about the qualifications and business practices of Allan K. Malina, the President of Servus Capital Management. The CRD number for Allan K. Malina is 4570812. If you have any questions about the contents of this brochure, please contact us at (434) 316-0246 or allan.malina@servuscm.com.

Servus Capital Management is an Investment Adviser registered with the State of Virginia. You should be aware that Registration with the United States Securities and Exchange Commission or with any state securities authority does not imply a certain level of skill or training.

Item 2. Material Changes Since Last Update to Firm Brochure.

There are no material changes in this brochure from the last annual updating amendment on March 13, 2024, of Servus Capital Management. Material changes relate to Servus Capital Management's policies, practices or conflicts of interests.

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Advisory Business

Item 4

Introduction

Servus Capital Management, LLC ("SCM") is a Limited Liability Company and is a State registered investment advisor ("RIA") firm. Its principal place of business is 1922 Graves Mill Road, Upper Level, Lynchburg, VA 24502. The firm was formed in 2009.

SCM was incorporated in the State of Virginia on June 5, 2009. SCM was a federally covered advisor from 2009 to 2017 before it became a state registered investment advisor in Virginia. It is wholly-owned by our President, Allan K. Malina. The experience, education and background of our President can be found in the accompanying Brochure Supplement document.

Types of Services

Our firm provides financial planning and portfolio management services to our clients. As we work with our clients to provide financial planning, we endeavor to use a holistic approach that will help our clients meet their goals. A few of the areas we help in are: retirement, education, estate, and insurance planning.

We use a three-pronged approach to manage our client's portfolios, as follows:

- Determine Risk Tolerance
- Determine Asset Allocation
- Engage price overlay

We design a portfolio according to the client's desires, goals, risk tolerance, comfort level and needs. Once these objectives are met, the appropriate investment vehicles are chosen.

Once we determine the best asset classes and investments to use, when appropriate, we then use a price overlay strategy to determine the appropriate entry point. Besides having a personalized plan, individuals want to make sure their assets are being monitored on a constant basis. We monitor the accounts, but more importantly we regularly monitor the investments that make up the accounts. As we monitor the portfolios, we are also working to determine if the investment vehicles we use are still appropriate to help us reach our clients goals.

We undertake to design individual portfolios that will meet the needs of our clients from a planning standpoint, but also from a conscience-based approach. We respect that some clients may want a portfolio that takes into consideration their values. As such, we are prepared to help our clients with the design of portfolios that meet planning needs as well as their personal convictions.

You will have the ability to place reasonable restrictions on the types of investments that may be purchased in your Account. You may also place reasonable limitations on the discretionary power granted to Servus Capital Management so long as the limitations are specifically set forth or included as an attachment to the client agreement.

Asset Parking Service

This platform allows the client to manage the investments within the portfolio but have a local advisor to assist them in documents, planning, research or whatever they may need apart from portfolio management.

This service is utilized by current clients that have assets that we do not actively manage but are in an account at SCM. This is often a legacy holding, or asset that is fully controlled by the client as to selling or buying.

Often clients that are under the care of a power of attorney (POA) use this service. The POA will use this service to hold the assets of the clients at SCM then to meet their needs or wait till distribution is needed. An example of this is when a child is managing the assets under a POA, while the parents are in a nursing home

Another example of this is when a couple is near to or in retirement and one of the spouses has managed the investments throughout the years. However, time has come that they want someone local to “bounce ideas off”, provide continuity if a premature death occurs, a local advisor to provide document support and possible financial advice.

Quantitative Portfolio Management

Using the Quantitative Portfolio Management (QPM) platform SCM uses a proprietary algorithm to determine when to follow the trend of various asset classes. This platform uses short term data to determine when to go long or short the various asset classes. The portfolio is always invested; however future changes to the algorithm may produce times that cash is held rather than being invested.

The QPM uses exchange traded funds (ETF) as the portfolio is managed. Generally, ETFs are used that have very low or no commissions on the custodian's platform. There may be exchange fees but that is normally measured in cents not dollars. Generally, the ETFs used are for the major indexes and have no issue with trading volume. ETFs are used to go long the market but also to short (inverse of) the market.

The QPM is quite labor intensive. Using intraday data, the QPM is recalculated throughout the day and produces a trigger that when the trigger is broken the direction of the trade is made or changed. The goal of the QPM is to have a positive return in both the market going up and down, with the goal limiting risk but also enhancing return. This being the goal, but cannot be guaranteed because past performance is not a guarantee of future results.

As the QPM is managed there is no use of margin or loaning money to invest more money into the platform. However, clients are given the option to use leveraged ETF's on both the long and short side. As leverage is chosen by the client, they must understand that the leverage will magnify the results both on the positive and negative results in the portfolio. SCM does not charge a different fee for the use of leveraged ETFs

Within the QPM there is the use of ETFs to go long or short the market. The algorithm calculates many times throughout the day, however once a trade is made there is a trade plus two-day window that the system is “locked” so as to avoid good faith violations. The holding periods are from two days to several months; the holding period is determined by the QPM reacting to price action. During this two-day window, market volatility may negatively affect the portfolio.

The QPM follows price action, thus is reactive and not predictive. It does not take into account economic news, statistics, reports, earnings, or other fundamental metrics. QPM also does not follow chart patterns, supports, resistance, etc. QPM develops daily triggers that act as signals when to go long or short the market. As with any portfolio management system the platform is being analyzed for improvement on a continual basis. When there is no distinct trend, the QPM can suffer negative results because of the sideways price action that causes a choppy investing environment.

The QPM can be appropriate for all investors. The client will choose what percentage of their portfolio is in the QPM. SCM describes all options that are applicable to our clients as well as prospective clients. SCM does not

recommend any particular platform, simply because SCM does want to suggest a fee structure or platform that the client is uncomfortable with. Once the platforms are explained, then the client must choose what they want.

The goal of the QPM is to have a consistent return that may or may not beat the index on a regular basis, however the most important goal is to control risk in a down market

SCM also wants clients and prospective clients to be aware that the management fees charged by SCM or your Advisor's fee, separately or collectively may be higher or lower than those charged by others in the industry and that it may be possible to obtain the same or similar services from other investment advisers at lower or higher rates. You may be able to obtain some or all of the types of services available at SCM through other firms and, depending on the circumstances; the aggregate of any separately-paid fees may be lower or higher than the annual fees shown in this document. Clients may be able to purchase these products from other brokers or agents who are not affiliated with SCM. The **QUANTITATIVE PORTFOLIO MANAGEMENT** system does charge a higher-than-average fee. However, due to the labor intensive set up, proprietary model and higher maintenance of the portfolio the fee is higher than the average 2% among registered investment advisors.

Limits Advice to Certain Types of Investments

SCM almost exclusively uses exchange traded funds for our clients to be invested in. There may be instances where a client chooses to retain individual securities due to tax, personal desires or estate issues.

Assets Under Management

As of December 2024, we managed approximately \$26,359,459.00 in assets under management on a discretionary basis and \$1,774,951.00 on a non-discretionary basis.

To better explain the various platforms and services SCM offers, please continue reading.

Fees and Compensation

Item 5.

Our fee structure is outlined below. Each of our clients is subject to the fee schedule below. However, we reserve the right, in our sole discretion, to negotiate a fee different from what is set forth below with any client or prospective client, based upon certain criteria, such as future earnings potential, future anticipated assets to be managed, related accounts, type of account, and negotiations with clients. Multiple accounts from the same investor, family, organization, or otherwise related parties, may be combined for the purposes of calculating the total fee.

ETF PLATFORM:

This platform for clients utilizes exchange traded funds and is the primary portfolio management system for our clients. We determine the asset allocation for our clients after they complete an investment policy statement. SCM uses a proprietary algorithm on a longer-term basis to determining trends and thus when to purchase or sell asset classes.

ETF PLATFORM Assets Under Management	Annual Percentage Fee
Less than \$2 million	1.25%
\$2 million but less than \$5 million	1.00%
\$5 million but less than \$10 million	1.00%
\$10 million but less than \$25 million	0.75%
\$25 million and above	Custom Pricing

Asset Parking Service

This platform allows the client to manage the investments within the portfolio but have a local advisor to assist them in documents, planning, research or whatever they may need apart from portfolio management.

Asset Parking Service Assets Under Management	Annual Percentage Fee
Less than \$2 million	.50%
\$2 million but less than \$5 million	.40%
\$5 million but less than \$10 million	.30%
\$10 million but less than \$25 million	.25%
\$25 million and above	Custom Pricing

QUANTITATIVE PORTFOLIO MANAGEMENT

Using this platform SCM uses a proprietary algorithm to determine when to follow the trend of various asset classes. This platform uses short term data to determine when to go long or short the various asset classes through ETF's.

QUANTITATIVE PORTFOLIO MANAGEMENT	Annual Percentage Fee
Assets Under Management	
Up to \$10 Million	3.00%
\$10 Million and over	2.5%

MUTUAL FUND PLATFORM

This platform uses mutual funds to achieve the asset allocation the client has chosen after completing the investment policy statement. SCM does not recommend this simply because of the higher internal fees and inability to make changes quickly to the portfolio. However, if a client wants mutual funds we can accommodate their desires.

MUTUAL FUND PLATFORM Assets Under Management (Not Recommended)	Annual Percentage Fee
Less than \$2 million	1.50%
\$2 million but less than \$5 million	1.50%
\$5 million but less than \$10 million	1.50%
\$10 million but less than \$25 million	1.50%
\$25 million and above	1.50%

RETIREMENT PLAN MANAGEMENT

SCM has teamed up with a third-party administrator and a custodian to provided retirement plans. SCM can provide the investment choices, asset allocation, custom portfolios and financial planning. The pricing is often customized for the particular retirement plan. Here is a sample fee structure; however, each plan is customized to their needs and asset levels.

RETIREMENT PLAN MANAGEMENT	Annual Percentage Fee	
Assets Under Management		
From \$	To \$	Annual Fee Percentage
\$0	\$1,000,000	0.60%
\$1,000,001	\$2,500,000	0.55%
\$2,500,001	\$5,000,000	0.50%
Above \$5,000,000		0.45%

Being a fee-based financial services firm, we charge a simple asset-based fee. However, a broker dealer having custody of the assets may charge a fee for their services. We undertake to negotiate to lower each broker-dealer's fee on behalf of our clients.

We do not charge a minimum account fee, annual fee, inactivity fee or low balance fee. We do not receive commissions from the buying and selling of securities, such as stocks, bonds, mutual funds, etc.

FINANCIAL PLANNING SERVICES AND FEES

In addition to its asset management services, we also provide financial planning services. These financial planning services include the analyses of:

1. Personal financial statements;
2. Budgets and cash flows;
3. Investment strategies and plans;
4. Retirement goals and objectives;
5. Family educational needs;
6. Risk management and insurance needs;
7. Alternative strategies for estate needs; and
8. Professional/business strategies, including Business Retirement Plans, etc.

The engagement of SCM to provide financial planning services is separate and distinct from a client retaining our services to provide fee-based investment advisory services on an on-going basis.

When providing the financial planning services listed above, we will charge a fee based upon a fixed-fee project basis. Financial planning fees are negotiable, but generally range between \$100 (minimum) to \$10,000+, depending on the complexity and scope of the engagement.

Financial planning fees are charged in arrears. The client can choose to have the fees deducted from the account or be billed the fees. The firm will accept check or money order for fees if not paid for out of the accounts.

All annual fees are charged on a monthly basis, payable in advance, based upon the fair market value of a client's account on the last business day of the calendar month. The initial monthly fees charged to new accounts shall be based upon the fair market value of the account on the day it is established and prorated based upon the days remaining in the initial monthly period.

Clients have the option of having our fees deducted from their account on approximately the second business day of the month or if a client prefers, a monthly invoice will be mailed to client, which shall be payable timely by the client. In the event that there is insufficient cash in the client's account, sales of sufficient securities in his/her account to raise sufficient cash to provide for the complete payment of our fees.

Being a fee-based financial services firm, we charge a simple asset-based fee for our portfolio management services. However, a broker dealer having custody of the assets may charge a fee for their services. We undertake to negotiate to lower each broker-dealer's fee on behalf of our clients. We do not charge a minimum account fee, annual fee, inactivity fee or low balance fee. We do not receive commissions from the buying and selling of investment vehicles, like stocks, bonds, mutual funds or other investment products.

Clients may also be subject to other fees and expenses such as prime brokerage charges, interest on margin accounts, borrowing charges on securities sold short, wire transfer and electronic transfer fees, fees and taxes on brokerage accounts and securities transactions and other charges related to account and asset management.

Either SCM or the Client may terminate their advisory agreement at any time by providing the other party with a written notice, which shall become effective ten (10) days after the receipt of the notice. Upon termination, any fees that have been pre-paid for a period beyond the termination date shall be promptly returned. Any unpaid

fees due and payable to SCM shall be calculated and charged on a pro-rata basis from the date of the last fee payment period to the effective date of the termination. Clients that terminate their advisory relationship with SCM are responsible for the securities held in their custodial account from the effective date of the termination. Therefore, the disposition of securities held in a former Client's custodial account must be coordinated directly with the Custodian by the former Client.

Neither SCM nor any of our supervised persons accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds to our clients.

Our clients are not required to use SCM to execute or purchase any investment, plan or insurance. They can use any agent or broker dealer to execute any of our recommendations.

Performance-Based Fees and Side-By-Side Management

Item 6

Neither we nor any of our supervised persons accept performance-based fees, or fees based on a share of capital gains or capital appreciation of assets in a client's account. The firm does not engage in side-by-side management.

Types of Clients

Item 7

We provide advisory services to the following types of clients:

- a. Non-Profit
- b. Individuals
- c. High-Net Worth
- d. 401k, 403b, profit sharing plans
- e. Corporations and other businesses

Account minimums

We do not have account minimum requirements since we believe that money, regardless how much it is, is very important to the person who owns those resources. There are no requirements for opening or maintaining an account.

Methods of Analysis, Investment Strategies and Risk of Loss

Item 8

Our initial focus in developing or formulating our investment advice and implementing a client's specific investment portfolio is to determine the client's risk appetite and goals through development of an investment policy statement (IPS). The IPS enables both the client and advisor to have a portfolio that is managed according to a common understanding of desires, goals and risk levels. With the goal of the portfolio being managed in a prudent manner that is dependable and repeatable.

As a Firm we have instituted the tools of Quantitative portfolio management (QPM). There are a set of rules we follow as we manage a client's portfolio:

1. The QPM system must be mechanical in nature, thus rules based.
2. Goal is to limit the losses, realizing losses will occur.
3. Manage a portfolio without emotional input or feelings, but to be driven by data.
4. The QPM system is methodical, repeatable and scalable to meet a growing client base.

During the investment management process, we continue our analysis and track the progress each client is making towards achieving his/her respective investment goals. We then adjust our investment strategy and investment vehicles as needed, thereby helping clients maintain a level of comfort in regard to all aspects of their investment portfolio.

An overriding principal in the conduct of our investment strategy is the implementation of Modern Portfolio Theory, which is based upon the belief that investors are inherently risk averse. Given two investments that offer the same expected return, we will prefer and select for our clients the less risky investment. Therefore, we will assume increased risk in a client's portfolio only if we believe the client is going to be adequately compensated by higher expected returns. However, some clients may choose a lack of diversification according to their investment goals.

Sometimes losses occur. Depending on the client profile, those losses may be very large or very small. If a client chooses a portfolio that has a high concentration of a security, or high percentage of stocks we communicate to that client the risk due to the exposure. The strategies we employ are not driven by high frequency trades but rather choosing an appropriate asset allocation, and use of exchange traded funds. We sometimes will work with a client that has or desires individual securities of their choice, but that is the exception and not the rule. All clients should be aware that investing in securities, regardless of the methods of analysis and strategies used, involves risk of loss that clients should be prepared to endure.

SCM almost exclusively uses exchange traded funds for our clients to be invested in. There may be instances where a client chooses to retain individual securities due to tax, personal desires or estate issues.

Asset Parking Services Risk(s): This platform allows the client to manage the investments within the portfolio but have a local advisor to assist them in documents, planning, research or whatever they may need apart from portfolio management.

Since this service does not provide investment advice or risk management. The client wholly assumes all risk that come from investing and managing the portfolio. They may include but not limited to: interest rate risk, concentrated portfolio risk, currency risk, market risk, foreign securities risk, liquidity risk, etc.

Quantitative Portfolio Risk(s): The QPM has risks that are similar to a long only portfolio but may include but also not limited to the following:

- **Market Risk** - The prices of the ETFs in which the QPM invests may decline for a number of reasons. The price declines may be steep, sudden and/or prolonged. One example of this is when the market

experiences a gap up or down in price. This can affect the client's portfolio in a negative way. Another example of market risk is when a market is in a non-trending market then the QPM can be negatively affected by a choppy, trendless market.

- **Portfolio Turnover Risk** - High portfolio turnover necessarily results in greater transaction costs, such as brokerage commissions, which the client must pay and short-term capital gains (or losses) to investors. Greater transaction costs may reduce the performance. Short-term capital gains are taxed as ordinary income under current federal income tax laws. However, consult your CPA for specific advice.
- **Liquidity Risk** - The risk that certain securities may be difficult or impossible to sell at the time and price beneficial to the clients portfolio.
- **Exchange-Traded Funds (ETFs) Risk** - The risk that the value of an ETF will be more volatile than the underlying portfolio of securities the ETF is designed to track, or that the costs to the client owning shares of the ETF will exceed those the client would incur by investing in such securities directly.
- **Short Investment Risk (Use of Inverse ETF)** - The risk that the investment will experience a loss if the value of the index the ETF tracks increases between the date of a (inverse ETF) short purchase and the date on which the short (inverse ETF) is sold.
- **Short-Term Investment Risk** - The risk that the QPM's short-term investment will not provide the liquidity or protection intended or will prevent the client from experiencing positive movements in the overall market.
- **Death of Allan Malina** – If at the untimely death of Allan Malina, the QPM is invested and the market moves against the current position then the portfolio can suffer losses. The goal of SCM is to hire additional staff over the next 12 – 18 months to limit this risk. Also, contingency plans are in place if this were to occur.
- **Equity Securities Risk.** The risk that events negatively affecting issuers, industries or financial markets in which the ETF's (that are used in the QPM), invests will impact the value of the ETFs held by the client and, thus, the value of the client's account over short or extended periods. ETFs in a particular style or in small or medium-sized companies may enhance that risk.
- **Computer/Internet/Power Malfunction** - If there is a natural disaster, hardware malfunction, loss of power or other reason the main system is not available, then there is the possibility that the client's portfolio may be adversely affected. However, there are back up systems and contingency plans in place to limit the exposure to such risks.
- **Human Error Risk** - The risk that the input of data or the reading of data in an incorrect manner may have a negative impact on the client's portfolio.
- **Cyber Risk** - This risk is ever increasing and changing. The use of security software, encrypted devices and services are used to limit the impact of cyber intrusions in the day to day works of the QPM and SCM. However, a "hack" may cause a negative impact on the client portfolio.
- **Transaction Fee Risk** – Transaction fees occur when an ETF is bought or sold. SCM has chosen to use the ETFs on the Select list at the custodian that do not carry commission charges or have very low charges. SCM suggests to each client to go paperless through the custodian that way the commissions will be lowered. There may be exchange fees or other fees not covered in this disclosure. If the account is small or there are a larger than usual number of transactions, there may be a negative impact on the client's account.

Risk of Loss

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our 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 with investing in securities through our investment management program, as described below:

- ETF and Mutual Fund Risk – When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
- Management Risk – Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

Disciplinary Information

Item 9

Neither SCM nor any of our supervised persons have been the subject of any legal or disciplinary events that would be material to your evaluation of SCM or the integrity of its management.

Other Financial Industry Activities and Affiliations

Item 10

Neither SCM nor any of our management persons or principals are registered or have an application pending to register as a broker-dealer, registered representative of a broker-dealer, futures commission merchant, commodity pool operator, as an associated person of the foregoing entities and is not engaged in any other financial activities other than as an investment adviser.

Other than as set forth below, neither SCM nor any of its management persons have affiliations with broker-dealers, municipal securities dealers or government securities dealers, investment companies or other pooled investment vehicles, other investment advisers or financial planners, futures commodity merchant, commodity pool operator or commodity trading advisor, banking or thrift institutions, accountants or accounting firms, lawyers or law firms, insurance agency or company, pension consultant, real estate broker or dealer or sponsor or syndicator of limited partnerships.

Relationship with Charles Schwab and Co., Inc.

Although SCM does not have an affiliate relationship with Charles E. Schwab and Co., Inc. ("Schwab"), it has established a close business relationship with Schwab. Schwab, the nation's largest discount broker-dealer, has developed and implemented the Schwab Institutional Program, which provides registered investments advisers, such as SCM, with a variety of important services. These services include access to an unlimited number of mutual funds from well-known fund families, institutional separate account managers, exchange traded funds, individual securities, and corporate and municipal bonds. Mutual funds offered through Schwab are offered at net asset value. Schwab also provides investment advisers with electronic back-office systems for reporting and recordkeeping. Schwab acts as the primary custodian for our clients. Although it is not a material consideration in determining to use and recommend that clients utilize the services of Schwab as broker-dealer/custodian, we receive certain support services and/or products without cost, or at a reduced cost, which assists us to better monitor and service client accounts maintained at Schwab. Included among the support services that may be provided by Schwab as the broker-dealer/custodian, and received by SCM, are investment related research; pricing information and market data; software and other technology that provides access to Client account data; compliance publications and information; attendance at broker-dealer/custodian sponsored conferences, meetings and other educational events; computer hardware and/or software; and other products used by SCM in furtherance of its investment advisory business activities.

Some of the support services provided to SCM by Schwab may also be provided by other custodians used by our clients.

SCM does not recommend or select other investment advisers for our clients.

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

Item 11

We have implemented a Code of Ethics (the "Code"), which is available to clients and potential clients upon request. We place great emphasis on complying with all applicable laws and regulations governing its practices as a registered investment adviser. Therefore, SCM has established firm guidelines in regard to the professional standards of conduct for its employees, which emphasizes the protection of client interests at all times and demonstrates its commitment to its fiduciary duties of honesty, good faith, and fair dealing with clients. All employees are expected to adhere strictly to these guidelines outlined in the Code, which requires employees to submit personal securities transactions and holdings reports to SCM that will be reviewed by a qualified representative of SCM on a periodic basis. Employees are encouraged to report any violations of the Firm's Code to the Firm's Chief Compliance Officer. Additionally, SCM maintains and enforces written policies reasonably designed to prevent the misuse or dissemination of any material non-public information about Clients or their account holdings by the Firm or any employee.

SCM permits its employees to maintain personal securities accounts and to invest in the same securities that are recommended to our clients. These practices create potential conflicts of interest, which may include the ability to take an investment opportunity away from a client for their own portfolio, front-running client transactions in order to benefit from the market effect of clients' transactions, and an incentive not to recommend the sale of securities held by clients in order to protect the value of their personal investment. However, employees are not permitted to buy or sell securities recommended to our clients at or about the same time that such recommendations are made to clients, unless reasonable efforts are made to first disclose such transaction to the client. In the event that a client cannot be contacted prior to the purchase or sale of similar securities, SCM and its employees have the right to enter into the trades that they desire.

Any potential conflicts are addressed through the provisions of our Code, pursuant to which all supervised persons who have access to nonpublic information regarding clients' purchases or sales of securities, makes securities recommendations to clients or has access to recommendations that are nonpublic ("access persons") must periodically report their personal securities transactions and holdings to our Chief Compliance Officer ("CCO"). The CCO is required to periodically review these reports for improper trades by access persons. Access persons must report securities holdings at the time such person becomes an access person and at least once a year thereafter. The holdings reports must be current as of a date not more than forty-five (45) days prior to the individual becoming an access person, in the case of the initial report, or the date the report is submitted, in the case of the annual report. Quarterly reports are required of all personal securities transactions by access persons.

However, transactions effected pursuant to an automatic investment plan and securities held in accounts over which the access person has no direct or indirect influence or control do not need to be reported.

Access persons must submit reports for reportable securities in which the access person has, or acquires, any direct or indirect beneficial ownership. The access person must acquire SCM approval before investing in an initial public offering or a limited offering such as a private placement.

Access persons shall not recommend a transaction involving any security to a client without first disclosing the access person's interest, if any, in such security or the issuer thereof.

This section is intended to provide a summary description of the Code of Ethics of SCM. If you wish to review the Code of Ethics in its entirety, you should send us a written request and upon receipt, we will promptly provide a copy of the Code of Ethics to you.

Brokerage Practices

Item 12

The Custodian and Brokers We Use

Servus Capital Management (SCM) does not maintain custody of your assets. 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), a FINRA registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them. If you do not wish to place your assets with Schwab, then we can help you choose a custodian that meets your needs. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account, which is described in the next paragraph.

How We Select Brokers/Custodians to recommend to our clients:

We seek to recommend a custodian /broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among other, these.

- Combination of transactions execution services along with asset custody services (generally without a separate fee for custody)
- Capability to execute, clear and settle trades (buy and sell securities for your account)
- Capabilities to facilitate transfers and payments to and from accounts (wire transfers, check request, bill payments, etc.)
- Breadth of investment products and available (stocks, bonds, mutual fund, exchange traded fund (ETFs), etc.,)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of these services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them
- Reputation, financial strength and stability of the provider
- Their prior service to us and our other clients
- Availability of other products and services that benefit us, and discussed below

Your Custody and Brokerage Costs

For our client's accounts it maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settles into your Schwab account. Schwab's commission rates and other fees when applicable to our client accounts were negotiated based on our commitment to maintain a minimum of \$10,000,000 of our client's assets statement equity in accounts at Schwab. This commitment benefits you because the overall commission rates and asset-based fees you pay are lower than they would be if we had not made the commitment. In addition to commissions of asset-based fees Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer by where the securities bought or the fund from the securities sold are deposited (settled) into our Schwab account. These fees are in addition to the

commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading cost, we have Schwab execute most trades for your account.

Products and Services Available to Us from Schwab

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage-trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our client's accounts while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us as long as we keep a total of at least \$10 million of our client's assets in accounts at Schwab. If we have less than \$10 million in client assets at Schwab it may charge us quarterly service fees. Here is a more detailed description of Schwab's support services.

Services that Benefit You.

Schwab's institutional brokerage services include access to a broad range of investment products, executions of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account. SCM also uses the Schwab Intelligent Integration service. This service enables the performance reporting to be done in a seamless manner as well as other inter-office programs to occur. We pay an annual fee to use the service but since we also use Charles Schwab as the custodian we receive a discount to those services.

Services that May Not Directly Benefit You

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our client's account. They include investment research, both Schwab's own and that of third parties. We may use this research to service all of some substantial number of our client's accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab 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 client's accounts and
- Assist with back-office functions, record keeping and client reporting

Services that Generally Benefit Only Us

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Technology, compliance, legal, and business consulting
- Publications and conferences on practice management and business succession.

- Access to employee benefits providers, human capital consultants and insurance providers.

Schwab may provide some of these services itself, in other cases it will arrange for third party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits such as occasional business entertainment of our personnel.

Our interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services so long as we keep a total of at least \$10 million of client assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions of assets in custody. The \$10 million minimum may give us an incentive to recommend that you maintain your account with Schwab based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest.

Brokerage for Client Referrals

In selecting or recommending broker-dealers, SCM does not consider whether it or a related person receives client referrals from such broker-dealer or any third party,

Directed Brokerage

SCM may permit clients to direct it to execute transactions through a specified broker-dealer. Clients must refer to their advisory agreements for a complete understanding of how they may be permitted to direct brokerage. If a client directs brokerage, the client will be required to acknowledge in writing that the client's direction with respect to the use of brokers supersedes any authority granted to SCM to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; [the client may be unable to participate in block trades (unless SCM is able to engage in "step outs"); and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

Aggregation of Orders

Although each client's portfolio accounts are individually managed, SCM may purchase or sell the same securities at the same time for multiple clients. When this occurs, it is often advantageous to aggregate the securities of multiple clients into one trading block for execution. Clients whose portfolio securities are purchased or sold in an aggregated transaction will receive the same execution price, and if the aggregated purchase or sale involves several executions to complete the transaction, each client shall receive the average price paid or received on the aggregated transaction.

If, however, an aggregated transaction results in only a partial execution and the equal allocation of the partial execution amongst multiple clients would result in an inefficient trading unit in client portfolios, we reserve the right to allocate the transaction to specific individual clients on an equitable rotational basis so that over time, no client is disadvantaged in the management of its portfolio.

Additionally, if we do not aggregate securities in a single transaction for multiple clients when buying or selling the same securities on behalf of more than one client, then we may be unable to achieve most favorable execution of client transactions, which could cost clients' money in trade execution.

Review of Accounts

Item 13

Portfolio and Plan Review

Besides having a personalized plan, individuals want to make sure their assets are being monitored on a constant basis. Our President monitors the accounts, but more importantly we monitor the investments in the accounts on a monthly, quarterly and yearly basis. As SCM monitors the economy, we are also working to determine if the investment vehicles SCM is using are still appropriate to help us reach our clients goals.

We realize a great deal of work goes into developing a plan to achieve the goals of our clients but we believe the most important aspect is the execution of the plan. We believe that performance is an outgrowth of good planning and exceptional service.

Meeting with Clients

Our policy is very simple, determine a review process and then follow it. We allow the client to dictate times, places and frequency of meetings for the purpose of reviewing their respective goals and objectives because we believe availability is a large part of serving our clients.

Sometimes significant events occur within our world, such as natural or manmade disasters, significant swings in the securities markets or various other events that may affect our client portfolios. In times of these significant events, it is our policy to again review the allocation, diversification and investments.

Reports

For our asset management services, you are provided with monthly or quarterly statements directly from the qualified custodian. We do not generally prepare performance reports. If a client requests a performance of their accounts, then the appropriate software is used to calculate the returns that are requested, and the client will receive a written report that details the client's account.

Financial planning clients do not receive any report other than the written plan originally contracted for and provided by SCM.

When you have questions about your account statement or performance reports, you should contact the qualified custodian preparing the statement.

Client Referrals and Other Compensation

Item 14

We receive research (economic, fundamental, technical, portfolio design as well as other types) from research firms and/or broker dealers. SCM clearly communicates (normally verbally or through email) to these organizations that SCM has no requirement to do any business with their organization. Finally, SCM as a policy does not engage in “soft dollar” arraignments.

SCM does not directly or indirectly compensate any person for client referrals.

The only compensation received from advisory services is the fees charged for providing investment advisory services as described in *Item 5* of this Disclosure Brochure. SCM receives no other forms of compensation in connection with providing investment advice.

Custody

Item 15

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

SCM is deemed to have custody of client funds and securities whenever SCM is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody SCM will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which SCM is deemed to have custody, we have established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements. When clients have questions about their account statements, they should contact SCM or the qualified custodian preparing the statement.

SCM does not send internally generated account statements to clients.

Investment Discretion

Item 16

SCM does practice discretionary account management. When we do agree to manage an account in a discretionary basis, the following procedure applies:

- We are granted the investment authority to make any and all investment decisions related to the purchase and sale of securities and/or assets held in the client's account; provided, that securities are approved and authorized by the investment policy statement (IPS) established for the account;
- We are not required to obtain approval from the client for each individual investment decision and transaction; however, we are guided by the client's IPS and we cannot deviate from such without the prior approval of the client;
- We are authorized to purchase and sell all securities approved and authorized in the IPS, which may include, but shall not limited to common or preferred stock, convertible stock or bonds, options, warrants, rights, mutual funds, limited partnerships, annuities, corporate, municipal or government bonds, notes or bills, and mortgage-backed securities; and
- We do not have full Power-of-Attorney and shall not have authority to withdraw funds or to take custody of client's funds or securities.

You will have the ability to place reasonable restrictions on the types of investments that may be purchased in your Account. You may also place reasonable limitations on the discretionary power granted to SCM so long as the limitations are specifically set forth or included as an attachment to the client agreement.

Voting Client Securities

Item 17

As a matter of policy, we do not vote, and will not accept authority to vote the proxies of securities held in a client's portfolio. As such, each client will receive the proxies from their respective custodians and clients will be solely responsible for voting such proxies. Clients may contact us regarding proxy voting procedures, but we will not provide advice on how such proxies are to be voted.

Financial Information

Item 18

SCM does not currently have any financial commitments that might impair our current or future ability to meet our contractual commitments to clients and we have not been the subject of a bankruptcy petition at any time during the past ten years.

Requirements for State Registered Advisers

Item 19

Principal Executive Officer

Allan K. Malina

Year of Birth: 1971

Formal Education after High School:

- Liberty University, Bachelor of Science, Religion – Biblical Studies 2001

Business Background for the Previous Five Years:

- Merrill Lynch, Financial Advisor, 2/2005 to June/2009
- Servus Capital Management LLC - Chief Executive Officer & President (March 2009 to Present)

How Performance-based Fees are Calculated and Degree of Risk to Clients

We do not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Material Disciplinary Disclosures for Management Persons of this Firm

Neither SCM nor any of our supervised persons have been the subject of any legal or disciplinary events that would be material to your evaluation of SCM or the integrity of its management.

Material Relationships That Management Persons Have with Issuers of Securities (If Any)

See Item 10.C and 11.B.

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Educational Background and Business Experience

Form ADV Part 2B, Item 2

Disclose the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years. If the supervised person has no high school education, no formal education after high school, or no business background, disclose this fact. You may list any professional designations held by the supervised person, but if you do so, you must provide a sufficient explanation of the minimum qualifications required for each designation to allow clients to understand the value of the designation.

Allan K. Malina

Year of Birth: 1971

Formal Education after High School:

- Liberty University, Bachelor of Science, Religion – Biblical Studies 2001

Business Background:

- Merrill Lynch, Financial Advisor, 2/2005 to June/2009
- Servus Capital Management LLC - Chief Executive Officer & President (March 2009 to Present)
- Morgan Stanley - Financial Advisor 2002-2005

Disciplinary Information

Form ADV Part 2B, Item 3

If there are legal or disciplinary events material to a client's or prospective client's evaluation of the supervised person, disclose all material facts regarding those events.

Items 3.A, 3.B, 3.C, and 3.D below list specific legal and disciplinary events presumed to be material for this Item. If the supervised person has been involved in one of these events, you must disclose it under this Item for ten years following the date of the event, unless (1) the event was resolved in the supervised person's favor, or was reversed, suspended or vacated, or (2) you have rebutted the presumption of materiality to determine that the event is not material (see Note below). For purposes of calculating this ten-year period, the "date" of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments or decrees lapsed.

Items 3.A, 3.B, 3.C, and 3.D do not contain an exclusive list of material disciplinary events. If the supervised person has been involved in a legal or disciplinary event that is not listed in Items 3.A, 3.B, 3.C, or 3.D but is material to a client's or prospective client's evaluation of the supervised person's integrity, you must disclose the event. Similarly, even if more than ten years have passed since the date of the event, you must disclose the event if it is so serious that it remains currently material to a client's or prospective client's evaluation. If you deliver a supplement electronically and if a particular disclosure required below for the supervised person is provided through either the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system or the IAPD, you may satisfy that particular disclosure obligation by including in that supplement (i) a statement that the supervised person has a disciplinary history, the details of which can be found on FINRA's BrokerCheck system or the IAPD, and (ii) a hyperlink to the relevant system with a brief explanation of how the client can access the disciplinary history. The BrokerCheck link is www.finra.org/brokercheck; the IAPD link is www.adviserinfo.sec.gov.

- A. A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the supervised person
1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
 2. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
 3. was found to have been involved in a violation of an investment-related statute or regulation; or
 4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the supervised person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.

NO

- B. An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which the supervised person
1. was found to have caused an investment-related business to lose its authorization to do business; or
 2. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority
 - (a) denying, suspending, or revoking the authorization of the supervised person to act in an investment-related business;
 - (b) barring or suspending the supervised person's association with an investment-related business;
 - (c) otherwise significantly limiting the supervised person's investment-related activities; or

(d) imposing a civil money penalty of more than \$2,500 on the supervised person.

NO

C. A self-regulatory organization (SRO) proceeding in which the supervised person

1. was found to have caused an investment-related business to lose its authorization to do business; or
2. was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500.

NO

D. Any other proceeding in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct. If the supervised person resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a proceeding (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.

NO

Note: You may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, you are not required to disclose it. When you review a legal or disciplinary event involving the supervised person to determine whether it is appropriate to rebut the presumption of materiality, you should consider all of the following factors: (1) the proximity of the supervised person to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If you conclude that the materiality presumption has been overcome, you must prepare and maintain a file memorandum of your determination in your records. See SEC rule 204-2(a)(14)(iii) and similar state rule.

Other Business Activities

Form ADV Part 2B, Item 4

- A. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, disclose this fact and describe the business relationship, if any, between the advisory business and the other business.
- If a relationship between the advisory business and the supervised person's other financial industry activities creates a material conflict of interest with clients, describe the nature of the conflict and generally how you address it.
 - If the supervised person receives commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service ("trail") fees from the sale of mutual funds, disclose this fact. If this compensation is not cash, explain what type of compensation the supervised person receives. Explain that this practice gives the supervised person an incentive to recommend investment products based on the compensation received, rather than on the client's needs.
- NO
- B. If the supervised person is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of the supervised person's income or involve a substantial amount of the supervised person's time, disclose this fact and describe the nature of that business. If the other business activities represent less than 10 percent of the supervised person's time and income, you may presume that they are not substantial.

Alan K. Mallina is not engaged in any investment-related business or occupation (other than this advisory firm).

Additional Compensation

Form ADV Part 2B, Item 5

If someone who is not a client provides an economic benefit to the supervised person for providing advisory services, generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include the supervised person's regular salary. Any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

NO

Supervision

Form ADV Part 2B, Item 6

Explain how you supervise the supervised person, including how you monitor the advice the supervised person provides to clients. Provide the name, title and telephone number of the person responsible for supervising the supervised person's advisory activities on behalf of your firm.

Allan K. Malina is the President, Chief Executive Officer but also the Chief Compliance Officer. With the many regulations from the S.E.C. and policies that SCM has put into place these are followed and reviewed on a regular basis to make sure Allan and the firm is in compliance.

Requirements for State-Registered Advisers

Form ADV Part 2B, Item 7

****If you are registered or are registering with one or more state securities authorities, you must respond to the following additional items.**

A. In addition to the events listed in Item 3 of Part 2B, if the supervised person has been involved in one of the events listed below, disclose all material facts regarding the event.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

NO

B. If the supervised person has been the subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

NO



ALLAN K. MALINA
FINANCIAL ADVISOR
PRESIDENT

SERVUS CAPITAL MANAGEMENT
1922 GRAVES MILL ROAD
UPPER LEVEL
LYNCHBURG, VA 24502

(434) 316-0246
(866) 396-6861
(866) 797-6711 (FAX)
ALLAN.MALINA@SERVUSCM.COM

PRIVACY NOTICE

Servus Capital Management LLC ("SCM") maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients' non-public personal information ("information"). Through this policy and its underlying procedures, SCM strives to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

It is the policy of SCM to restrict access to current and former clients' information (such as information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, or account balances) to those employees and entities who need to know that information in order to provide products and services to the client.

SCM may disclose client information if SCM is: (1) previously authorized to disclose the information to individuals and/or entities not affiliated with SCM, including but not limited to the client's other professional advisers and/or service advisers¹; (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations.

The disclosure of information contained in any document completed by the client for processing and/or transmittal by SCM in order to facilitate the commencement, continuation, or termination of a business relationship between the client and a non-affiliated third party service provider², and any information contained in any document completed and/or executed by the client for SCM³, shall be deemed as having been automatically authorized by the client with respect to the corresponding non-affiliated third party service provider.

SCM permits only authorized employees who have signed a copy of SCM's Privacy Policy to have access to client information. Employees violating SCM's Privacy Policy will be subject to SCM's internal disciplinary process. Additionally, whenever SCM retains other organizations to provide services to clients, SCM will require such organizations to sign confidentiality agreements and/or the Privacy Policy.

Should you have any questions regarding the SCM's Privacy Policy, please contact Allan K. Malina, CEO & President, at (434) 316-0246.

Allan K. Malina
President

¹ Professional advisers and/ or service providers shall include, but shall not be limited to, an attorney, accountant, insurance agent, broker-dealer, investment adviser, or custodian.

² Non-affiliated third party service providers shall include, but shall not be limited to, a broker-dealer, investment adviser, custodian, or insurance company.

³ SCM documents shall include, but shall not be limited to, Discretionary and Non-Discretionary Advisory Agreements, Financial Planning and Consulting Agreements, or Client Profile forms.