

AGREEMENT FOR INVESTMENT PERFORMANCE MONITORING AND ADVISORY SERVICES

THIS AGREEMENT entered into this ___ day of _____, 20__, between **BOGDAHN CONSULTING, LLC, D/B/A THE BOGDAHN GROUP** (hereinafter referred to as “Consultant”), and **CITY OF CORAL GABLES DEFINED CONTRIBUTION PLAN** (hereinafter referred to as “Client”).

WITNESSETH:

WHEREAS, Consultant is in the business of providing investment performance monitoring and advisory services; and

WHEREAS, Client is vested with the authority and responsibility for the investment and administration of the assets of the City of Coral Gables Defined Contribution Plan (hereinafter referred to as the “Fund”), and;

WHEREAS, Client desires Consultant to provide investment performance monitoring and advisory services with respect to the Fund;

NOW, THEREFORE, in consideration of the premises and mutual promises herein contained, the parties agree as follows:

A. SERVICES OF CONSULTANT

Consultant shall provide the following services to Client as shown below:

1. Develop investment policy statement and provide periodic review and maintenance as appropriate.
2. Calculate individual investment manager and overall fund investment performance quarterly and provide written and verbal summary reports.
3. Monitor and report on investment manager compliance to investment policy statement and specific investment mandate on a quarterly basis.
4. Provide overall economic context for discussion and evaluation of quarterly results.
5. Conduct regular industry fee benchmarking surveys to ensure competitive cost for value.
6. Design, distribute, collect and evaluate request for proposal (RFP) responses for recordkeeping and administration services as appropriate.
7. Facilitate the vendor review and selection process for plan related service providers, including finalist interviews.
8. Assist with provider scope of work definition, negotiation of fees and contracts.
9. Provide ongoing educational services to the Committee on relevant topics.

10. Recommend and perform replacement manager/fund evaluations as necessary and appropriate.
11. Review employee education strategy for fit with demographics and Plan goals.
12. Serve the Committee as a resource for defined contribution strategy and decision making.

B. RESPONSIBILITIES OF CLIENT

Client agrees to provide or cause its accountants, trustees, investment managers and legal advisors to provide information regarding income, investment performance, and other pertinent matters relating to the Fund as requested by Consultant from time to time. Client, through its authorized representatives, also agrees to communicate the Fund's needs and goals to Consultant and to keep Consultant informed of changes in Client's situation, needs and goals. Consultant shall not be required to verify any information obtained from Client, Client's or Fund's accountants, actuaries, trustees, investment managers and legal advisors and is expressly authorized to rely thereon.

C. CONFIDENTIALITY

All information and advice furnished by either party to the other, including their authorized representatives, agents and employees, shall be treated as confidential and not disclosed to third parties except as agreed upon in writing or required by law; however, Client authorizes Consultant to use Client's name as a reference to other prospective clients. Consultant is further given absolute authority by Client to disclose, provide copies of, and communicate information obtained from Client or developed by Consultant to Client's investment manager and Client's attorney.

D. BASIS OF ADVICE

Client acknowledges that Consultant obtains information from wide variety of publicly available sources and certain private sources. The advice provided by Consultant to Client is based upon its analysis of such information.

E. REPRESENTATIONS OF CONSULTANT

Consultant hereby represents that:

1. Consultant is currently registered with the Securities Exchange Commission as an investment advisor under the Investment Advisors Act of 1940.
2. Consultant is not the Client's investment manager nor is Consultant in any way compensated by nor does Consultant have any affiliation with any Fund investment manager.
3. Consultant will make all calculations according to industry standard methods of calculating time weighted rates of return.

4. Consultant will not receive any form of compensation, either direct or indirect, from any source in conjunction with, or as a result of, performance of its services under this Agreement other than as outlined in Section F.

F. FEES TO CONSULTANT

In consideration of the services rendered by Consultant, the Client shall pay an all-inclusive annual fee of \$35,000.00, billed quarterly in arrears. This fee includes all services described in Section A and is guaranteed not to increase for three years from the effective date of this Agreement. Consultant acknowledges that because of Fund restructuring which will be initially required, Fund will not initially have sufficient internal resources available from which to pay Consultant's fee. Consultant agrees to allow Client to defer payment of Consultant's fee until such future date as Fund has generated sufficient internal liquidity to pay Consultant. Should consultant services be terminated b/c the plan sponsor doesn't want to move forward with ongoing services before sufficient internal liquidity is available to pay consultant the plan sponsor will pay the consultant \$8750 per quarter until the date of notification that consultant services will no longer be needed. If notification is done intra-quarter the quarterly fee will be pro-rated.

G. TERMINATION

Client shall have the right to terminate this Agreement at any time upon written notice to Consultant. Consultant may terminate this Agreement at any time on ninety (90) days written notice. Charges in either case, if any, for services completed will be prorated based on the fees as set forth in Section F. No other termination fee will be charged for termination of this Agreement.

H. MISCELLANEOUS

1. This Agreement shall be applicable only to the services individually prepared for Client. It shall not relate to any advice given by any person or persons not specifically designated by Consultant in writing to perform such services. By execution of this agreement, the Consultant acknowledges that it is a fiduciary of the Fund within the meaning of the Employee Retirement Income Security Act of 1974 ("ERISA").
2. Neither party hereto may assign, convey, or otherwise transfer any of its rights, obligations, or interest herein without the prior express written consent of the other party.
3. This Agreement represents the complete agreement of the parties with regard to the subject matter and supersedes any prior understanding or agreement, oral or written.
4. This Agreement may be amended or revised only by an instrument in writing signed by Client and Consultant.

5. The validity of this Agreement and of any of its terms or provisions, as well as the rights and duties of the parties hereunder, shall be governed by the laws of the State of Florida.
6. This Agreement may be executed in several counterparts, each of which shall be deemed an original.
7. This Agreement shall become effective upon execution.
8. Client acknowledges receipt of Consultant's ADV Part 2 and Privacy Notice and authorizes Consultant to deliver all future required disclosures electronically.

IN WITNESS WHEREOF, the Client has signed duplicates hereof, and Consultant had caused its corporate name to be signed to said duplicates by its proper officers thereunder duly authorized on the day and in the year first above written.

**BOGDAHN CONSULTING, LLC
D/B/A THE BOGDAHN GROUP**

**CITY OF CORAL GABLES
DEFINED CONTRIBUTION PLAN**

By: _____

By: _____

As: _____

As: _____

Date: _____

Date: _____

The Bogdahn Group
 4901 Vineland Road, Suite 600
 Orlando, FL 32811
 Tel: 863.293.8289 Fax: 863.292.8717
www.bogdahngroup.com

This brochure supplement provides information about David E. West that supplements The Bogdahn Group's brochure. You should have received a copy of that brochure. Please contact Richard Spurgeon, CCO at 863-904-0869, or richards@bogdahngroup.com, if you did not receive the brochure or if you have questions about the contents of this supplement. Additional information about David E. West is available on the SEC's website at www.advisorinfo.sec.gov.

David E. West, CFA

CRD#: 4708845 Year of Birth: 1960

Item 2 Educational Background and Business Experience

Education

1984 – Stetson University, BA in Finance, Roland George Merit Scholar Award

Professional Designations

Chartered Financial Analyst (CFA) Charterholder – The CFA designation is issued by the CFA Institute. The CFA designation requires the candidate to have a bachelor's degree, four (4) years of professional working experience in the investment field, and successfully passed the examination process. In addition, Charterholders are required to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Business Background (Past five years)

01/2006 – Present The Bogdahn Group
 Member/Senior Consultant

Item 3 Disciplinary Information

There are no legal or disciplinary events to report.

Item 4 Other Business Activities

Mr. West is not involved in any other business activities.

Item 5 Additional Compensation

Mr. West does not receive any economic benefit from anyone who is not a client for providing advisory services.

Item 6 Supervision

In the conduct of his advisory activities, Mr. West reports directly to Troy R. Brown, Director of Consulting and must also adhere to the policy directives of the firm's Investment Policy Committee. Richard D. Spurgeon, Chief Compliance Officer of The Bogdahn Group, is responsible for the oversight of our firm's investment advisory activities to ensure that we operate in compliance with all federal and state laws and regulations. He is further responsible for establishing and maintaining the firm's compliance policies, procedures and standards of ethical conduct. Mr. Spurgeon can be contacted at the phone number and email address in the first paragraph of this supplement.

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Steven E. Gordon

CRD#: 4533817 Year of Birth: 1968

Item 2 Educational Background and Business Experience

Education

1990 - University of South Florida, BS in Finance
 1997 – Rollins College, MBA

Business Background (Past five years)

01/2012 – Present	The Bogdahn Group Director of Retirement Solutions
01/2009 – 01/2012	Mercer Market Leader, Mid Atlantic and Southeast
01/2005 – 01/2009	Wachovia Corporation (now Wells Fargo) Director of Institutional Sales

Item 3 Disciplinary Information

There are no disciplinary events to report.

Item 4 Other Business Activities

Mr. Gordon is not involved in any other business activities.

Item 5 Additional Compensation

Mr. Gordon does not receive any economic benefit from anyone who is not a client for providing advisory services.

Item 6 Supervision

In the conduct of his advisory activities, Mr. Gordon reports directly to Michael Welker, CEO, and Joseph R. Bogdahn, Chairman of the Board, and must also adhere to the policy directives of the firm's Investment Policy Committee. Richard D. Spurgeon, Chief Compliance Officer of The Bogdahn Group, is responsible for the oversight of our firm's investment advisory activities to ensure that we operate in compliance with all federal and state laws and regulations. He is further responsible for establishing and maintaining the firm's compliance policies, procedures and standards of ethical conduct. Mr. Spurgeon can be contacted at the phone number and email address in the first paragraph of this supplement.

Item 1 - Cover Page



4901 Vineland Road, Suite 600
Orlando, FL 32811

Phone: (863) 293-8289

World Wide Web Address: www.bogdahngroup.com

Date of Brochure
March 27, 2015

This brochure provides information about the qualifications and business practices of The Bogdahn Group. If you have any questions about the contents of this brochure, please contact us at (863) 293-8289, or by email at compliance@bogdahngroup.com. The information contained in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.



Item 2 - Material Changes

The following items have materially changed from our last brochure, which was dated March 27, 2014.

Item 4 – Advisory Business

Effective January 1, 2015, majority ownership of the firm was transferred from Joseph Bogdahn to Michael Welker. Mr. Bogdahn retains the Chairman title, but day-to-day operations are directed by Mr. Welker and the Executive Committee (see page 4).

Item 10 - Other Financial Industry Activities & Affiliations

We have some consultants who hold investment advisory and/or insurance licenses where required by state regulation. In no case, however, are any of our supervised persons licensed and associated with an entity that would allow them to be directly or indirectly compensated by a third party as result of holding those licenses (see page 9).

Item 11 - Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

In this item we clarify the steps we take to attempt to avoid being exposed to inside information (see page 10).

Item 12 – Brokerage Practices

In this item we clarify why we do not have relationships with broker/dealers even if we have discretionary investment authority (see page 10).

Item 16 – Investment Discretion

In this item we clarify the instances in which we will accept discretionary investment authority and how we do so without directly investing in publicly traded individual securities or executing trades ourselves (see page 13).

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Item 4 - Advisory Business

Who We Are

The Bogdahn Group, is a 100% employee-owned, full-service registered investment advisor¹ offering a broad range of truly independent investment consulting services to all types of institutional clients. While almost all of our relationships are non-discretionary, we have accepted discretionary investment authority for three clients, whose assets totaled \$23.1 million as of 12/31/2014. Please see **Item 16 – Investment Discretion** for a description of the circumstances under which we will accept discretionary authority.

Our History

The Bogdahn Group was organized in September, 2000 as a Florida Limited Liability Company offering investment consulting services to institutional clients under the leadership of Joseph R. Bogdahn. In a milestone for the firm, at the beginning of 2015 majority ownership was acquired by Michael Welker as the first step of a long-planned succession. The next steps in the plan will be to broaden the ownership of the firm among more employees. Today, we have a team of talented professionals with diverse business backgrounds and offices in strategic locations throughout the United States.

Owners

Michael F. Welker, CEO, is the only owner of more than 25% of the company and is also the sole Manager of the LLC.

¹The term “registered investment advisor” is not intended to imply that The Bogdahn Group has attained a certain level of skill or training. It is used strictly to reference the fact that we are “Registered” as an “Investment Advisor” with the United States Securities & Exchange Commission – and “Notice Filed” with such other State Regulatory Agencies that may have limited regulatory jurisdiction over our business practices.

Mission, Vision & Values

Mission

To represent the sole interest of our clients by redefining independence.

Vision

To be a transformational organization viewed by our clients as the pinnacle of client service by providing innovative ideas and independent, straight forward solutions.

Values

Excellence – Continually strive to improve oneself, team members and the firm.

Humility – Demonstrate modesty and respect and seek to elevate team members.

Innovative – Continually strive to improve the quality and efficiency of service.

Intentional – Thoughtful before action with every decision to reflect our goals, mission and vision.

Integrity – Exhibit honesty at all times, never compromising our values.

Introspective – Ability to critically assess oneself and improve.

Philanthropic – Serve the greater good by giving our time and resources to those that need it.

Responsible – Take accountability for completing our obligations to the firm and clients.

Service – Work as a team and willingly help others.

What We Do

Simplified Investment Decisions

We strive to deliver our services in a customized and user-friendly format based on each client's unique needs. Using a dynamic combination of data, presentation, education and communication tools, we attempt to provide our clients with the resources and actionable recommendations that will allow them to make the most informed decisions possible.

At The Bogdahn Group, we believe in simplifying investment decisions. We have found that the most effective way to accomplish this objective is to build client "partnerships" based on understanding and trust. By taking time to meet and understand our clients on a personal level,

we are able to provide them with meaningful and actionable investment guidance that produces sustainable, solid results.

While our recommendations are based on a wealth of experience and in-depth analysis, we strive to present client information in a format that is understandable and intuitive. As a result, we do not structure our presentations or communications to impress the client with our technical knowledge and expertise, but rather to allow clients to easily recall the reasoning behind each of the recommendations we make for their portfolio.

Providing Definitive Recommendations

One of the greatest criticisms of the consulting industry as a whole is that firms are “long” on ideas and “short” on implementation. We continuously work to redefine this criticism by providing our clients with definitive recommendations and efficient implementation of structures and strategies.

Although portfolio decisions are ultimately implemented at the direction of the client, our process is focused on identifying and quantifying investment themes that allow for the realistic assessment of risk and the establishment of return expectations. The presentation and communication of this information is always structured toward allowing clients to make informed investment decisions they can trust.

Straight Forward Solutions

In today’s investment environment, client needs and portfolio strategies are increasingly complex. Despite these challenges, we continuously work to tailor our information and recommendations using a “straight forward” approach that results in actionable, cost-efficient client solutions.

We encourage any prospect to communicate with our clients and other industry professionals to evaluate their opinion of our services and professionalism. You will quickly discern that there is a significant difference between consulting firms and that The Bogdahn Group has a unique and enviable position in the industry.

Client Service Philosophy

To maximize the effectiveness of our recommendations, The Bogdahn Group utilizes a team-based approach to client service. However, each client will also be assigned a primary consultant that is responsible for coordinating the relationship and understanding that client's specific needs. This client service philosophy is based on the belief that the formulation of an investment plan, coupled with prudent implementation and performance evaluation, is essential to the oversight of investment assets. Our primary objective is to serve as the client's advocate and guide in implementing this process.

At The Bogdahn Group, we focus on creating partnerships, not customers. Our investment consulting services are specifically tailored to meet each client's unique needs. From return requirements, risk tolerance, cash flow and liquidity needs, we work with each client to implement dynamic strategies based on their portfolio through time. Through careful research and collaboration, our focused consultants and dedicated service teams provide the key ingredients necessary for fostering and maintaining strong client-centered relationships.

In short, we work to meet all of the needs and demands of our clients by establishing a framework that simplifies their investment and fiduciary decisions.

Item 5 - Fees & Compensation

We are not affiliated with any investment manager, insurance company, brokerage firm, custodian, administrator, or other 3rd party service provider. We simply do not engage in any soft-dollar fee arrangements or other revenue generating programs. 100% of our fee is generated from the hard-dollar annual retainer fee the client pays directly to us for our services.

This singular "fee for services" model has allowed us to eliminate potential conflicts of interest regarding our recommendations. As a result, this model gives clients the confidence and trust that our sole focus is on providing the highest level of independent and objective investment consulting and advisory service possible.

Our hard dollar fees vary depending on the complexity of the engagement. While we do not have a minimum plan size that we will accept, we do have a minimum annual fee of \$25,000 for new clients. All fees are fully disclosed and negotiated with the client in advance. Most clients'

fees are billed in arrears, generally quarterly. However, some clients have agreed to be billed for services quarterly in advance. In those instances, if the client terminates the relationship any unearned fee is returned to the client. Under no circumstances are our fees based on a share of capital gains or appreciation of funds. Clients can terminate our advisory services at any time upon written notice.

Item 6 - Performance-Based Fees & Side-By-Side Management

We do not charge fees based on a share of capital gains or the capital appreciation of the assets held in your accounts, nor do we manage assets.

Item 7 - Types of Clients

The types of clients we offer advisory services to are described above under “**What We Do**” in the “**Item 4 - Advisory Business**” section. We do not have minimum plan size requirements for investment consulting services.

Item 8 - Methods of Analysis, Investment Strategies & Risk of Loss

The focus of our strategic asset allocation is the development of “collective manager intelligence” by our research team leading to manager recommendations that are consistent and repeatable. Our dedicated research team’s sole responsibility is to conduct due diligence on current and prospective management strategies that can be utilized by clients in accordance with their Investment Policy Statement.

The open and ongoing manager due diligence process, which includes both qualitative and quantitative aspects, is focused on identifying managers and strategies that maintain a sustainable competitive advantage relative to their peers.

Item 9 - Disciplinary Information

We are required to disclose disciplinary events that are material for our clients' evaluation of our advisory practices; therefore, pursuant to Item 9C of the Form ADV Part 2A: Firm Brochure, question 9.C.2 asks that we disclose:

“A self-regulatory organization (SRO) proceeding in which your firm or a management person 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.”

In December of 2008, Troy E. Brown, our Director of Consulting, entered into an Acceptance, Waiver & Consent Agreement with FINRA for actions that occurred in the Merrill Lynch branch office where he worked in 2003 and 2004. FINRA found that a subordinate associate in the Merrill Lynch branch was taking Firm Element continuing education training modules and proficiency tests for several registered representatives of that office. This was occurring unbeknownst to Mr. Brown. When he became aware of the activities by the subordinate, he immediately stopped the practice and completed all continuing education training both required and elective.

Even though FINRA noted that Mr. Brown took action on his own to correct the violation of FINRA Member Rules, which had a positive impact on the limited citation received by FINRA, the damage was already done. All of the registered representatives in that Merrill Lynch branch were cited with failure to complete the required training by FINRA. Mr. Brown was suspended from association with any FINRA Member firm for ten (10) days and required to pay a civil penalty of \$5,000.

Item 10 - Other Financial Industry Activities & Affiliations

We are a fee for service registered investment advisor. Any of our supervised persons who hold investment advisory or insurance licenses are not affiliated with any broker/dealer or insurance company and thus are not able to generate commissions. The licenses are only held as required by state regulatory authorities to be able to advise clients within those states where the licenses are required.

Item 11 - Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

Code of Ethics

The Bogdahn Group serves as a fiduciary to every client. As a fiduciary, we have an affirmative duty to render unbiased investment advice, and at all times act in our client's and plan participants' best interests. To maintain this ethical responsibility, we have adopted the same Code of Ethics as that used by the CFA Institute. This establishes the fundamental principles of conduct and professionalism expected by all personnel in discharging their duties. This Code is a value-laden guide committing each of our staff members to uphold the highest ethical standards. Our Code of Ethics is designed to deter inappropriate behavior and heighten awareness as to what is right, fair, just and good by promoting:

- ❖ Honest and ethical conduct.
- ❖ Full, fair and accurate disclosure.
- ❖ Compliance with applicable rules and regulations.
- ❖ Reporting of any violation of the Code.
- ❖ Accountability.

To help you understand our ethical culture and standards, how we control sensitive information and what steps have been taken to prevent personnel from abusing their position, a copy of our Code of Ethics is available for review upon request and our Chief Compliance Officer welcomes any inquiry to discuss questions or concerns.

Insider Trading

The Company is in compliance with the Insider Trading and Securities Fraud Enforcement Act of 1988. In the course of our normal consulting activities we are not in a position to be exposed to inside information. For those few clients from whom we have accepted delegated 3(38) discretionary investment authority, we do not invest client funds in individual securities of publicly traded companies. We limit our directly selected investment vehicles to regulated investment company securities (mutual funds) or privately-offered investments appropriate for the individual client. If a separately managed account of individual traded securities is appropriate for one of these clients, our practice is to further delegate the investment discretion to an investment manager who has been fully vetted by our Research Group and Investment Policy Committee.

Item 12 - Brokerage Practices

We do not maintain a custodial, or any other relationship with any licensed broker-dealer because we do not execute trades on publicly-traded individual securities. Any mutual fund purchases or redemptions we make on behalf of client are executed by the client's independent custodian.

Item 13 - Review of Accounts

Performance Reports

On a periodic basis, we will provide clients with a performance evaluation of the investment(s) (herein called the Performance Report). The Performance Report reviews the performance of the clients' assets, expressed by various modern portfolio statistics that compare the performance of the investment managers to the guidelines called for by the Investment Policy Statement. The Performance Report provides historical and comparative information, and is not to be relied upon as forecast or predictor of future performance returns.

Investment Manager Reports

We will review fund data for all the investment managers on at least an annual basis, with respect to their overall performance in achieving the desired objectives of the Investment Policy Statement.

The review is directed to whether the investment manager's performance and discipline is consistent with the intent and objectives of the Investment Policy Statement. We will provide information to facilitate comparisons of the investment manager's overall performance benchmarks described in the plan's Investment Policy Statement.

The client is responsible for reviewing and understanding the information and analysis we provide and assessing the adequacy of any particular investment manager's overall performance. We will assist the client in fulfilling this responsibility.

Item 14 - Client Referrals & Other Compensation

We do not receive any economic benefit from an independent party for our investment consulting services. In addition, we do not compensate persons/firms for client referrals.

Item 15 - Custody

We do not take possession of or maintain custody of any funds or securities, but simply monitor the holdings within in the portfolio. Possession and custody of the funds and/or securities is maintained by an independent custodian selected by the client.

Item 16 - Investment Discretion

Most of our services under ERISA are provided as a 3(21) limited scope fiduciary. Under this arrangement we are a fiduciary to the plan but do not have discretionary authority to make investment selections or replace investment options within the plan. We provide extensive investment tools to the trustees and/or administrators of the plan to guide them in their duty to implement, maintain, administer and provide fiduciary oversight of their investment programs.

We do, however, take on the role of a 3(38) fiduciary, with discretionary authority, for some participant-directed defined contribution plan clients. In these cases, our discretion is exercised only to the extent of adding and removing investment vehicle options available on the clients' plan investment platform. Further, all investment option change decisions are reviewed with and agreed to by the client prior to the change being effected. We do not make any decisions or exercise any discretionary authority over participant monies going into, or coming out of, the investment options available on the platform.

In the only other scenario where we have accepted 3(38) discretion for a client, we do not execute any trades for publicly traded securities. Mutual fund trades are executed by the client's independent custodian. If a separately managed account is employed, the investment discretion for that portfolio is further delegated to an investment manager fully vetted by our Research Group and Investment Policy Committee.

Item 17 - Voting Client Securities

We do not vote proxies. The client agrees that they will retain the right to vote all proxies or, more typically, delegates that right to the investment managers hired to manage their assets.

Item 18 - Financial Information

We are not required to include financial information in our Disclosure Brochure since we will not take custody of client funds or securities or bill client accounts six (6) months or more in advance for more than \$1,200.

END OF DISCLOSURE BROCHURE

PRIVACY NOTICE

As required by the Securities and Exchange Commission Regulation S-P, this is a notification regarding the collection, use, and protection of personal information furnished to us by our clients.

Our Commitment to Your Privacy

The Bogdahn Group is committed to protecting the confidentiality of the information provided to us by our clients. To the extent that we may collect nonpublic personal information about our clients or their plan participants, we will not share this information with third parties except as described below.

How We Protect Information

Our employees are required to protect the confidentiality of information and to comply with our established policies. We also maintain physical, electronic and procedural safeguards to protect information.

Disclosure of Information

We may disclose information when we believe it necessary for the conduct of our business, or where disclosure is required by law. For example, information may be disclosed for audit or research purposes, to attorneys or other professionals, or to law enforcement and regulatory agencies, for example, to help us prevent fraud. In addition, we may disclose information to third party service providers to enable them to provide business services for us, such as performing computer related or data maintenance/processing services, or to facilitate the processing of transactions requested by you.

Information may also be disclosed to other professional advisors engaged by you, such as accountants, actuaries, custodians and attorneys. Except in these specific, limited situations, we will not make any disclosures of information to other companies who may want to sell their products or services to you. For example, we do not sell client lists and we will not sell your name.

Access to Information

If you desire to review any file we maintain for your information, please contact our office. Our Form ADV is available upon request. Please contact us for a free copy.