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McDermott Investment Advisors, LLC

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FORM ADV PART 2 BROCHURE

This brochure provides information about the qualifications and business practices of McDermott Investment Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (610) 882-1460. 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 McDermott Investment Advisors, LLC, is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for McDermott Investment Advisors, LLC is 132221.

McDermott Investment Advisors, LLC is an investment adviser registered with the Securities and Exchange Commission (SEC). An "investment adviser" means any person who, for compensation, engages in the business of advising others, either directly or through publications or writings, as to the value of securities or as to the advisability of investing in, purchasing, or selling securities, or who, for compensation and as part of a regular business, issues or promulgates analyses or reports concerning securities. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

Material Changes - Item 2

On February 2, 2024, we submitted our annual updating amendment filing for fiscal year 2023. There were no material changes to report.

On July 23, 2024, we completed a series of amendments to Items 4, 5, 8, 10, 12, and 14 of our Form ADV Part 2 Brochure to provide additional disclosures about our portfolio management services, broker-dealer affiliations, methods of analysis, brokerage activities, receipt of additional rebates and compensation, and the associated conflicts of interest. Clients have been provided with a copy of our entire ADV. We urge you to read the document in its entirety.

We also updated our principal office phone number to (610) 882-1460.

We review and update our brochure at least annually to make sure that it remains current.

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Advisory Business - Item 4

McDermott Investment Advisors, LLC is a registered investment adviser with its principal place of business in Naples, Florida. Our firm is organized as a limited liability company domiciled in Florida. We have been providing investment advisory services since 2004. Dean McDermott, Ph.D. is our principal owner and began his career in the financial services industry in 1987. Currently, we offer the following investment advisory services, which are personalized to each individual client:

- Portfolio Management Services
- Financial Planning Services
- Selection of Other Advisers

As used in this brochure, the words "we," "our" and "us" refer to McDermott Investment Advisors, LLC, and the words "you," "your" and "client" refer to you as either a client or prospective client of our firm. Also, you may see the term Associated Person throughout this Brochure. As used in this Brochure, our Associated Persons are our firm's officers, employees, and all individuals providing investment advice on behalf of our firm.

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs.

Portfolio Management Services

We offer discretionary and non-discretionary portfolio management services. Our investment advice is tailored to meet our clients' needs and investment objectives. If you retain our firm for portfolio management services, we will meet with you to determine your investment objectives, risk tolerance, and other relevant information (the "suitability information") at the beginning of our advisory relationship. We will use the suitability information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice and/or to make investments on your behalf. Once we construct an investment portfolio for you, we will monitor your portfolio's performance on an ongoing basis and will rebalance the portfolio as required by changes in market conditions and in your financial circumstances.

In order to participate in our discretionary portfolio management program, you will have to grant our firm discretionary authority in writing to manage your account. Discretionary authorization will allow our firm to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm, a power of attorney, or trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased for your account) by providing our firm with your restrictions and guidelines in writing. If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account.

Currently, our portfolio management services are offered directly by our firm or in conjunction with a sub adviser. Where we use the services of a sub adviser, the sub adviser assists our firm with back-office support, trading, report preparation, and billing.

We use model portfolios developed by our firm, the sub adviser, and/or other registered investment advisers, collectively "third parties." Where third-party models are used, these other investment advisers are responsible for the research and security selection within model portfolios, day-to-day trading, billing calculation, and other back-office operations. McDermott Investment Advisors, LLC is responsible for the supervision of the account, portfolio reallocations and rebalancing, and ongoing client interaction and servicing.

All accounts are managed in accordance with the client's investment needs. Investments may include various types of securities such as equity securities, Exchange Traded Funds (ETFs), mutual funds, corporate debt securities, commercial paper, certificates of deposit, municipal securities, and U.S. Government securities. Other types of investments may also be recommended where such investments are appropriate based on the client's stated goals and objectives.

Investments and allocations are determined and based on the client's predefined objectives, risk tolerance, time horizon, financial horizon, financial information, and other various suitability factors. Further restrictions and guidelines imposed by the client may affect the composition and performance of a client's portfolio. For these reasons, the performance of the portfolio may not be identical to other clients of McDermott Investment Advisors, LLC. On an ongoing basis, McDermott Investment Advisors, LLC reviews the client's financial circumstances and investment objectives and instructs the sub adviser to make the necessary adjustments to the client's portfolio.

Clients are advised to provide the firm with prompt notice of any changes in their personal financial circumstances, investment objectives, goals, and tolerance for risk.

Selection of Other Advisers - Endeavor Program
As part of our investment advisory services, we may recommend that you use the services of a third-party investment adviser ("TPA") to manage your entire, or a portion of your, investment portfolio. After gathering information about your financial situation and objectives, we will recommend that you engage the TPA or participate in a specific investment program. Factors that we take into consideration when making our recommendation(s) include, but are not limited to, the following: the TPA's performance, methods of analysis, fees, your financial needs, investment goals, risk tolerance, and investment objectives. We will monitor the TPA(s)' performance to ensure its management and investment style remains aligned with your investment goals and objectives.

We have selected Envestnet Portfolio Solutions, Inc.'s Endeavor Program to provide discretionary investment management services to smaller accounts with an initial balance of $25,000 or less. Such accounts will be primarily invested in mutual funds and exchange traded funds managed by Envestnet Portfolio Solutions, Inc. and/or its affiliates.

Financial Planning Services
We offer broad-based and structured financial planning services. Financial planning will typically involve providing a variety of advisory services to clients regarding the management of their financial resources based on an analysis of their individual needs. If you retain our firm for financial planning services, we will meet with you to gather information about your financial circumstances and objectives. Once we review and analyze the information you provide to our firm, we will deliver a written plan to you, designed to help you achieve your stated financial goals and objectives.

Financial plans are based on your financial situation at the time we present the plan to you, and on the financial information you provide to our firm. You must promptly notify our firm if your financial situation, goals, objectives, or needs change.

You are under no obligation to act on our financial planning recommendations. Should you choose to act on any of our recommendations, you are not obligated to implement the financial plan through any of our other investment advisory services. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm.

Types of Investments

We offer advice on equity securities, warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities, US Government securities, options contracts on securities, and interest in partnerships investing in real estate, oil and gas interests, and others.

Additionally, we may advise you on any type of investment that we deem appropriate based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

You may request that we refrain from investing in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

Wrap Fee Programs

McDermott Investment Advisors, LLC does not participate in any wrap fee programs.

Assets Under Management

As of December 31, 2023, we manage discretionary assets under management of approximately $188,375,565 and non-discretionary assets under management of approximately $39,246,774.

Fees and Compensation - Item 5

Portfolio Management Services

Our fee for portfolio management services is based on a percentage of your assets we manage and is set forth in the following fee schedule:

Assets Under Management	Annualized Fee
$25,000 - $500,000	2.00%
$500,001 - $1,000,000	1.50%
$1,000,001 and above	1.00%

Our fee includes the fees charged by the sub adviser the portfolio model provider and the platform fee charged by the custodian. Endeavor Program accounts are subject to our customary portfolio management fees listed above.

Our annual portfolio management fee is billed and payable quarterly in advance based on the value of your account on the last day of the previous quarter.

If the portfolio management agreement is executed at any time other than the first day of a calendar quarter, our fees will apply on a pro-rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which you are a client. Our advisory fee is negotiable, depending on individual client circumstances. For example, we may negotiate a lower fee for clients with an account over $2.5 million. Additionally, individual accounts established by several members of the same family/household may be aggregated and given a reduced rate.

At our discretion, we may combine the account values of family members living in the same household to determine the applicable advisory fee. For example, we may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts. Combining account values may increase the asset total, which may result in your paying a reduced advisory fee based on the available breakpoints in our fee schedule stated above.

We will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when you have given our firm written authorization permitting the fees to be paid directly from your account. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy. We will also receive a duplicate copy of your account statements.

You may terminate the portfolio management agreement by providing written notice to our firm. You will incur a pro-rata charge for services rendered prior to the termination of the portfolio management agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

Financial Planning Services Fees
We charge an hourly fee of $200 for financial planning services, which is negotiable depending on the scope and complexity of the plan, your situation, and your financial objectives. An estimate of the total time/cost will be determined at the start of the advisory relationship. In limited circumstances, the cost/time could potentially exceed the initial estimate. In such cases, we will notify you and request that you approve the additional fee.

We require that you pay 50% of the fee in advance and the remaining portion upon the completion of the services rendered. We will not require prepayment of a fee more than six months in advance and in excess of $500.

You may terminate the financial planning agreement by providing written notice to our firm. You will incur a pro-rata charge for services rendered prior to the termination of the agreement. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

Additional Information about Fees and Expenses
As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through which your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to the "Brokerage Practices" section of this Disclosure Brochure.

Performance Reporting Services Fees: Clients who have selected to receive performance reporting services from Hilltop Securities are charged an annual reporting fee of $40.

Negotiability of Fees: We allow Associated Persons servicing the account to negotiate the exact investment management fees within the range disclosed in our Form ADV Part 2A Brochure. As a result, the Associated Person servicing your account may charge more or less for the same service than another Associated Person of our firm. Further, our annual investment management fee may be higher than that charged by other investment advisors offering similar services/programs.

Billing on Cash Positions: The firm treats cash and cash equivalents as an asset class. Accordingly, unless otherwise agreed in writing, all cash and cash equivalent positions (e.g., money market funds, etc.) are included as part of assets under management for purposes of calculating the firm's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there is no guarantee that such anticipated market conditions/events will occur), the firm may maintain cash and/or cash equivalent positions for defensive, liquidity, or other purposes. While assets are maintained in cash or cash equivalents, such amounts could miss market advances and, depending upon current yields, at any point in time, the firm's advisory fee could exceed the interest paid by the client's cash or cash equivalent positions.

IRA Rollover Considerations
As a normal extension of financial advice, we provide education or recommendations related to the rollover of an employer-sponsored retirement plan. A plan participant leaving employment has several options. Each choice offers advantages and disadvantages, depending on desired investment options and services, fees and expenses, withdrawal options, required minimum distributions, tax treatment, and the investor's unique financial needs and retirement plans. The complexity of these choices may lead an investor to seek assistance from us.

An Associated Person who recommends an investor roll over plan assets into an Individual Retirement Account ("IRA") may earn an asset-based fee as a result, but no compensation if assets are retained in the plan. Thus, we have an economic incentive to encourage an investor to roll plan assets into an IRA. In most cases, fees and expenses will increase to the investor as a result because the above-described fees will apply to assets rolled over to an IRA, and outlined ongoing services will be extended to these assets.

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. We have to act in your best interests and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests.

Compensation for the Sale of Securities or Other Investment Products
Client securities transactions will be placed through McDermott Investment Services, LLC ("MIS"). MIS is an affiliated introducing broker-dealer and financial services company engaged in the sale of securities and specialized investment products. MIS utilizes Hilltop Securities, Inc. ("Hilltop") for trade execution and custodial services. MIS and Hilltop are members of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC").

This affiliation creates a material conflict of interest because our firm's principal owner, Dean McDermott, and other Associated Persons of the firm, in their various capacities at MIS, will receive direct and indirect additional compensation in the form of commissions, transaction fees, markups and additional benefits from MIS and Hilltop for securities trades placed for their brokerage clients. In addition, such individuals, in their capacities as registered representatives of MIS will receive trails (i.e., 12b-1 fees) resulting from the sale of investment company products, including mutual funds and unit investment trusts. Compensation earned by these individuals in their capacities as registered representatives is separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on your needs. Clients should be aware of these conflicts of interest and should take them into consideration when deciding whether to engage our firm and to use our affiliated broker-dealer for securities transactions. Additional information about our brokerage practices, additional compensation received, and associated conflicts of interest is provided in Item 12 and Item 14 of this document.

Clients should note that MIS will not receive any commission or mark-up for securities transactions placed for McDermott Investment Advisors, LLC's advisory client accounts. Such clients will only be charged transaction fees by Hilltop.

Clients of our firm have the option to purchase investment products that we recommend through other brokers and agents that are not affiliated with our firm. In such cases, clients would have to terminate their relationship with our firm would have to obtain services elsewhere.

Certain Executive officers and other Associated Persons of our firm are licensed as independent insurance agents. These individuals will earn commission-based compensation for selling insurance products, including insurance products they sell to our clients. Insurance commissions earned by these individuals are separate from and in addition to our advisory fees. The sale of insurance instruments and other commissionable products offered by Associated Persons are intended to complement our advisory services. However, this practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. We address this conflict of interest by recommending insurance products only where we, in good faith, believe that it is appropriate for the client's particular needs and circumstances and only after a full presentation of the recommended insurance product to our client. In addition, we explain the insurance underwriting process to our clients to illustrate how the insurer also reviews the client's application and disclosures prior to the issuance of a resulting insuring agreement. Clients to whom the firm offers advisory services are informed that they are under no obligation to purchase insurance services. Clients who do choose to purchase insurance services are under no obligation to use our licensed Associated Persons and may use the insurance brokerage firm and agent of their choice.

At our discretion, we may offset our advisory fees to the extent our Associated Persons earn commissions in their separate capacities as registered representatives and insurance agents.

Any material conflicts of interest between you and our firm our affiliates, or our Associated Persons are disclosed in this Disclosure Brochure. If at any time additional material conflicts of interest arise, we will provide you with written notification of the material conflicts of interest or an updated Disclosure Brochure.

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

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

Types of Clients - Item 7

We offer investment advisory services to individuals, high net worth individuals, trusts, estates, and charitable organizations.

In general, we require a minimum of $100,000 to open and maintain a discretionary asset management account. Third-party advisory programs are subject to different minimums that are disclosed in each third party's disclosure documents.

At our discretion, we may waive this minimum account size. For example, we may waive the minimum if you appear to have significant potential for increasing your assets under our management. We may also combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts to meet the stated minimum.

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

Our investment strategies and advice may vary depending on each client's specific financial situation. As such, we determine investments and allocations based on your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio.

Methods of Analysis
We may use one or more of the following methods of analysis when formulating investment advice:

- Fundamental analysis is a method of evaluating a company or security by attempting to measure its intrinsic value. In other words, trying to determine a company's or a security's true value by looking at all aspects of the business, including both tangible factors (e.g., machinery buildings, land, etc.) and intangible factors (e.g., patents, trademarks, "brand" names, etc.). Fundamental analysis also involves examining related economic factors (e.g., overall economy and industry conditions, etc.), financial factors (e.g., company debt, interest rates, management salaries, and bonuses, etc.), qualitative factors (e.g., management expertise, industry cycles, labor relations, etc.), and quantitative factors (e.g., debt-to-equity and price-to-equity ratios). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of determining what sort of position to take with that security (underpriced = buy; overpriced = sell or short). This method of security analysis is considered the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

- Technical analysis is a technique that relies on the assumption that current market data (such as charts of price, volume, and open interest) can help predict future market trends, at least in the short term. It assumes that market psychology influences trading and can predict when stocks will rise or fall. Technical trading models are mathematically driven based upon historical data and trends of domestic and foreign market trading activity, including various industry and sector trading statistics within such markets. Technical trading models, through mathematical algorithms, attempt to identify when markets are likely to increase or decrease and identify appropriate entry and exit points. The primary risk of technical trading models is that historical trends and past performance cannot predict future trends, and there is no assurance that the mathematical algorithms employed are designed properly, updated with new data, and can accurately predict future market, industry, and sector performance.

Investment Strategies
We may use one or more of the following investment strategies when providing investment advice to you:

- *Long-Term Purchases* – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year. Using a long-term purchase strategy generally assumes the financial markets will go up in the long term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking up" assets that may be better utilized in the short-term in other investments.

- *Short-Term Purchases* – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations. Using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. Many factors can affect financial market performance in the short term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of time.

- Trading – securities are sold within 30 days. The principal type of risk associated with trading is market risk. There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Other factors, such as changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and government, economic, or monetary policies, may affect investments as well. Additionally, trading is speculative. Market movements are difficult to predict and are influenced by, among other things, government trade, fiscal, monetary, and exchange control programs and policies; changing supply and demand relationships; national and international political and economic events; changes in interest rates; and the inherent volatility of the marketplace. In addition, governments from time to time intervene, directly and by regulation, in certain markets, often with the intent to influence prices directly. The effects of government intervention may be particularly significant at certain times in the financial instrument markets and such intervention (as well as other factors) may cause these markets to move rapidly.

- Short Sales – securities transaction in which an investor sells securities they borrowed in anticipation of a price decline. The investor is then required to return an equal number of shares at some point in the future. A short seller will profit if the stock goes down in price, but if the price of the shares increases, the potential losses are unlimited.

Tax Considerations
Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Under IRS regulations, custodians and broker-dealers report the cost basis of equities acquired in client accounts. Our firm or the TPA managing your account will either instruct the custodian to use the *first-in, first-out "FIFO"* accounting method for calculating and reporting the cost basis of your investments or the custodian will default to the FIFO method where no instruction is given.

You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, please provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Please note that decisions about cost-basis accounting methods will need to be made before trades settle, as the cost-basis method cannot be changed after settlement.

Risk of Loss
Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Investing in securities involves the risk of loss that clients should be prepared to bear. Clients should fully understand the nature of the contractual relationship(s) into which they are entering and the extent of their risk exposure. Certain investment strategies may not be suitable for many members of the public. You should carefully consider whether the strategies employed would be appropriate for you in light of your experience, objectives, financial resources, and other relevant circumstances.

Recommendation of Particular Types of Securities
As disclosed under the "Advisory Business" section in this Brochure, we provide advice on various types of securities, and we do not necessarily recommend one particular type of security over another since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

General Investment Risk
All investments come with the risk of losing money. Investing involves substantial risks, including the complete possible loss of principal plus other losses, and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk, and you should familiarize yourself with the risks involved in the particular market instruments in which you intend to invest.

Loss of Value
There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and governmental economic or monetary policies.

Interest Rate Risk
Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer-term debt securities are usually more sensitive to interest rate changes.

Credit Risk
Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower-quality debt securities are more susceptible to these problems and their value may be more volatile.

Foreign Exchange Risk
Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned, and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of payments, governmental intervention, speculation, and other economic and political conditions. If the currency in which a security is denominated appreciates against the US Dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

Risks Associated with Investing in Equities
Investments in equities generally refer to buying shares of stocks by an individual or firm in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Risks Associated with Investing in Mutual Funds

Mutual funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager who trades the fund's investments in accordance with the fund's investment objective. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small-cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates on a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. The returns on mutual funds can be reduced by the costs of managing the funds. In addition, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, other types of mutual funds do charge such fees which can also reduce returns.

Risks Associated with Investing in Exchange Traded Funds (ETF)

Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock-holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency. Detailed information about the risks associated with each ETF is provided in the relevant ETF's prospectus.

Cybersecurity Risks

Our firm and our service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes, and practices designed to protect networks, systems, computers, programs, and data from cyber-attacks and hacking by other computer users, and to avoid the resulting damage and disruption of hardware and software systems, loss or corruption of data, and/or misappropriation of confidential information. In general, cyber-attacks are deliberate; however, unintentional events may have similar effects. Cyber-attacks may cause losses to clients by interfering with the processing of transactions, affecting the ability to calculate net asset value, or impeding or sabotaging trading. Clients may also incur substantial costs as the result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, and the dissemination of confidential and proprietary information. Any such breach could expose our firm to civil liability as well as regulatory inquiry and/or action. In addition, clients could be exposed to additional losses as a result of unauthorized use of their personal information. While our firm has established a business continuity plan and systems designed to prevent cyber-attacks, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified. Similar types of cyber security risks are also present for issuers of securities, investment companies, and other investment advisers in which we invest, which could result in material adverse consequences for such entities and may cause a client's investment in such entities to lose value.

Pandemic Risk

Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption. It is difficult to predict the long-term impact of such events because they are dependent on a variety of factors including the global response of regulators and governments to address and mitigate the worldwide effects of such events. Workforce reductions, travel restrictions, governmental responses and policies, and macroeconomic factors will negatively impact investment returns.

Recommendation of Other Advisers

In the event we recommend a third-party investment adviser ("TPA") to manage all or a portion of your assets, we will advise you on how to allocate your assets among various classes of securities or third-party investment managers, programs, or managed model portfolios. As such, we will primarily rely on investment model portfolios and strategies developed by the TPA and their portfolio managers. If there is a significant deviation in characteristics or performance from the stated strategy and/or benchmark, we may recommend changing models or replacing a TPA. The primary risk associated with investing with a TPA is that while a particular TPA may have demonstrated a certain level of success in the past; it may not be able to replicate that success in future markets. In addition, as we do not control the underlying investments in third-party model portfolios, there is also a risk that a TPA may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. To mitigate this risk, we seek TPAs with proven track records that have demonstrated a consistent level of performance and success over time. A TPA's past performance is not a guarantee of future results and certain market and economic risks exist that may adversely affect an account's performance, which could result in capital losses in your account. Please refer to the TPA's advisory agreements, Form ADV Brochure, and associated disclosure documents for details on their specific investment strategies, methods of analysis, and associated risks.

Structured Notes: Below are some specific risks related to the structured notes recommended by our firm:

- *Complexity*: Structured notes are complex financial instruments. Clients should understand the reference asset(s) or index(es) and determine how the note's payoff structure incorporates such reference asset(s) or index(es) in calculating the note's performance. This payoff calculation may include leverage multiplied by the performance of the reference asset or index, protection from losses should the reference asset or index produce negative returns, and/or fees. Structured notes may have complicated payoff structures that can make it difficult for clients to accurately assess their value, risk, and potential for growth through the term of the structured note. Determining the performance of each note can be complex and this calculation can vary significantly from note to note depending on the structure. Notes can be structured in a wide variety of ways. Payoff structures can be leveraged, inverse, or inverse-leveraged, which may result in larger returns or losses. Clients should carefully read the prospectus for a structured note to fully understand how the payoff on a note will be calculated and discuss these issues with our firm.
- *Market risk*: Some structured notes provide for the repayment of principal at maturity, which is often referred to as "principal protection." This principal protection is subject to the credit risk of the issuing financial institution. Many structured notes do not offer this feature. For structured notes that do not offer principal protection, the performance of the linked asset or index may cause clients to lose some, or all, of their principal. Depending on the nature of the linked asset or index, the market risk of the structured note may include changes in equity or commodity prices, changes in interest rates or foreign exchange rates, and/or market volatility.
- *Issuance price and note value*: The price of a structured note at issuance will likely be higher than the fair value of the structured note on the date of issuance. Issuers now generally disclose an estimated value of the structured note on the cover page of the offering prospectus, allowing investors to gauge the difference between the issuer's estimated value of the note and the issuance price. The estimated value of the notes is likely lower than the issuance price of the note to investors because issuers include the costs for selling, structuring, and/or hedging the exposure on the note in the initial price of their notes. After issuance, structured notes may not be re-sold on a daily basis and thus may be difficult to value given their complexity.
- *Liquidity*: The ability to trade or sell structured notes in a secondary market is often very limited, as structured notes (other than exchange-traded notes known as ETNs) are not listed for trading on securities exchanges. As a result, the only potential buyer for a structured note may be the issuing financial institution's broker-dealer affiliate or the broker-dealer distributor of the structured note. In addition, issuers often specifically disclaim their intention to repurchase or make markets in the notes they issue. Clients should, therefore, be prepared to hold a structured note to its maturity date or risk selling the note at a discount to its value at the time of sale.
- *Credit risk*: Structured notes are unsecured debt obligations of the issuer, meaning that the issuer is obligated to make payments on the notes as promised. These promises, including any principal protection, are only as good as the financial health of the structured note issuer. If the structured note

issuer defaults on these obligations, investors may lose some, or all, of the principal amount they invested in the structured notes as well as any other payments that may be due on the structured notes.

Disciplinary Information - Item 9

On March 19, 2019, the SEC Staff notified McDermott Investment Advisors and Dean McDermott that it had made a preliminary determination to recommend to the SEC that an enforcement action be brought against McDermott Investment Advisors and Dean McDermott arising from investments made into unit investment trusts (“UITs”) for certain of our advisory clients from January 2012 through December 2014. On September 13, 2019, the SEC notified us that it had filed a civil action in the United States District Court for the Eastern District of Pennsylvania related to these allegations (the “EDPA Action”). In the EDPA Action, the SEC alleged various claims arising from UIT purchases for certain advisory clients between March 2013 and December 2014. The crux of the EDPA Action was that we breached our fiduciary duty by failing to act in our advisory clients’ best interest; to seek best execution for client transactions; and by making inadequate disclosures to advisory clients regarding conflicts of interest and the availability of UITs with less expensive fees. The SEC also alleged that Mr. McDermott aided and abetted the Firm’s alleged violations.

The Firm and Mr. McDermott believe the UIT purchases were in our advisory clients’ best interest when viewed in the context of the comprehensive fee structure and the advisory relationship as a whole. There were two versions of the UITs available for purchase – one with a sales charge and one without. The SEC contended that the selection of the UIT version with the sales charge was improper. The Firm and Mr. McDermott believe that selecting the version with a sales charge was appropriate because doing so was part of a comprehensive fee structure, which provided most of the advisory clients with free equity trades and many advisory clients with discounted advisory fees. Despite presenting this, and other defenses, at a six-day trial in Philadelphia, the jury returned its verdict in the SEC’s favor. Specifically, the jury’s verdict found that Mr. McDermott and MIA intentionally “failed to act in [their] clients’ best interest, seek best execution or disclose a conflict of interest,” in breach of their fiduciary duty and in violation of Section 206(1) of the Advisors Act. The jury’s verdict also found that Mr. McDermott violated Section 209 of the Advisors Act by aiding and abetting MIA’s Section 206(1) violation.

On October 26, 2022, a hearing was held to determine the appropriate remedies to be imposed. The SEC sought permanent injunctions against MIA and Mr. McDermott, disgorgement of $143,379.33 plus prejudgment interest of $50,983.60, and civil penalties against MIA and Mr. McDermott in the amounts of $400,000 and $80,000 respectively. In its final order following the hearing, the Court granted the SEC’s request for disgorgement and prejudgment interest, ordering that MIS, MIA, and Mr. McDermott be jointly and severally liable for $143,379.33 in disgorgement and $50,983.60 in prejudgment interest. The Court, however, denied the SEC’s request for permanent injunctions against MIA and Mr. McDermott, and significantly lowered the SEC’s requested civil penalties from $480,000 to $160,000, ordering MIA to pay $110,000, and Mr. McDermott to pay $50,000. Payments were deposited with the Court on November 21, 2022.

There are no other pending civil actions against the Firm or any management person. There are no pending criminal actions against the Firm or any management person. There are no criminal or civil actions in a domestic, foreign, or military court of competent jurisdiction in which the Firm or any management person has been convicted or found liable.

There is no administrative proceeding at this time before the SEC in which the Firm or a management person has been involved. There is no self-regulatory organization proceeding in which the Firm or a management person is involved.

Other Financial Industry Activities or Affiliations - Item 10

Registrations with Broker-Dealer

Dean P. McDermott, Ph.D., Managing Member of McDermott Investment Advisors, LLC is also the principal owner and a registered representative with McDermott Investment Services, LLC (“MIS”). MIS is a diversified broker-dealer and financial services company engaged in the sale of securities and specialized investment products. MIS is a member of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”). Please see the disclosures under “Compensation for the Sale of Securities or Other Investment Products” in Item 5 above for additional information about this affiliation and associated conflicts of interest.

Licensed Insurance Agents

Certain Executive officers and other Associated Persons of our firm are licensed as independent insurance agents. These individuals will earn commission-based compensation for selling insurance products, including insurance products they sell to our clients. Insurance commissions earned by these individuals are separate from and in addition to our advisory fees. The sale of insurance instruments and other commissionable products offered by Associated Persons is intended to complement our advisory services. However, this practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. We address this conflict of interest by recommending insurance products only where we, in good faith, believe that it is appropriate for the client’s particular needs and circumstances and only after a full presentation of the recommended insurance product to our client. In addition, we explain the insurance underwriting process to our clients to illustrate how the insurer also reviews the client’s application and disclosures prior to the issuance of a resulting insuring agreement. Clients to whom the firm offers advisory services are informed that they are under no obligation to purchase insurance services. Clients who do choose to purchase insurance services are under no obligation to use our licensed Associated Persons and may use the insurance brokerage firm and agent of their choice.

Recommendation of Other Advisers

We may recommend that you use a third-party adviser (“TPA”) based on your needs and suitability. We will receive compensation from the TPA for recommending that you use their services. These compensation arrangements present a conflict of interest because we have a financial incentive to recommend the services of the third-party adviser. You are not obligated, contractually or otherwise, to use the services of any TPA we recommend.

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

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our Associated Persons are expected to adhere strictly to these guidelines. Our Code of Ethics also requires that certain Associated Persons submit reports of their personal account holdings and transactions to a qualified representative of our firm who will review these reports on a periodic basis. Associated Persons are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public (insider) information about you or your account holdings by our Associated Persons.

Our Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting Dean P. McDermott at (610) 882-1460.

Participation or Interest in Client Transactions

As disclosed above, advisory representatives are registered representatives licensed to sell securities through McDermott Investment Services, LLC. In this capacity, advisory representatives are involved in, and compensated for, the sale of securities of various types, including, but not limited to, stocks, bonds, and mutual funds.

You are expressly advised that you have total freedom to implement recommendations through any broker-dealer you choose. If you choose to implement recommendations, we make by purchasing securities through McDermott Investment Services, LLC, your advisory representative in his or her separate capacity as a registered representative, may receive additional compensation in the form of commissions, including 12b-1 fees for the sale of investment company products.

Personal Trading Practices

Our firm or our Associated Persons may buy or sell securities for you at the same time we or our Associated Persons buy or sell such securities for our own account. We may also combine our orders to purchase securities with your orders to purchase securities ("block trading"). Please refer to the "Brokerage Practices" section in this Brochure for information on our block trading practices. Our firm or our Associated Persons may recommend securities to you at the same time we or our Associated Persons purchase such securities for our own account.

A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our Associated Persons nor we shall have priority over your account in the purchase or sale of securities.

Brokerage Practices - Item 12

We recommend the brokerage services of McDermott Investment Services, LLC ("MIS"), an affiliated securities broker-dealer, and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation, and its clearing firm/custodian Hilltop Securities, Inc. ("Hilltop"). MIS is affiliated with our firm through common control and ownership. In selecting Hilltop to custody advisory clients' accounts, we considered their reputation, the services and benefits Hilltop provides to MIS, and the ease of trading and management of clients' accounts by having the majority of client accounts held at the same brokerage firm. We believe that MIS and Hilltop together provide quality execution and custodial services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided, including execution capabilities, commission rates, and responsiveness to our clients. In recognition of the value of research services and additional brokerage products and services provided, you may pay higher commissions and/or trading costs than those that are available elsewhere.

The practice of executing transactions for advisory accounts through our affiliate, MIS, and the receipt of additional compensation from Hilltop pose a conflict of interest. Although our firm and our Associated Persons, who are licensed as registered representatives, or otherwise have a financial interest in MIS, do not receive commissions and other transaction-related compensation from MIS in connection with securities transactions placed in McDermott Investment Advisors, LLC's advisory client accounts, MIS does receive additional benefits from Hilltop that are listed in Item 14 below. The receipt of additional benefits creates a conflict of interest because we are incentivized to use the services of MIS and Hilltop over the services of other broker dealers and custodians who do not provide additional benefits. We uphold our fiduciary duty by acting in our advisory clients' best interests by recommending investments that, in our opinion, are suitable for our clients' investment needs, and by seeking best execution for client transactions and providing disclosures to advisory clients regarding conflicts of interest associated with such recommendations. We have also adopted compliance procedures and a code of ethics to address conflicts of interest and to require our Associated Persons to adhere to our fiduciary duty of fair dealing with clients.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Directed Brokerage

In limited circumstances, and at our discretion, some clients may instruct our firm to use one or more particular brokers for the transactions in their accounts. If you choose to direct our firm to use a particular broker, you should understand that this might prevent our firm from effectively negotiating brokerage commissions on your behalf. This practice may also prevent our firm from obtaining favorable net price and execution. Thus, when directing brokerage business, you should consider whether the commission expenses, execution, clearance, and settlement capabilities that you will obtain through your broker are adequately favorable in comparison to those that we would otherwise obtain for you.

Block Trades

We combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion regarding factual and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs.

Accounts owned by our firm or our Associated Persons may participate in block trading with your accounts; however, they will not be given preferential treatment.

Review of Accounts - Item 13

Portfolio Management Account Reviews

Dean P. McDermott, Managing Member, or another qualified Investment Adviser Representative of our firm will monitor your securities holdings on an ongoing basis and will conduct account reviews at least monthly to ensure the advisory services provided to you are consistent with your current investment needs and objectives. Additional reviews may be conducted based on various factors, including, but not limited to contributions and withdrawals, market moving events, security specific events, and/or changes in your risk/return objectives.

You will receive trade confirmations and monthly or quarterly statements from your account custodian(s). Only at your request will we provide you with additional written reports in conjunction with account reviews.

A financial plan is a snapshot in time and no ongoing reviews are conducted. We recommend clients engage us on an annual basis to update the financial plan. Such reviews and updates are subject to the firm's then current hourly rate.

Client Referrals and Other Compensation - Item 14

As disclosed under the "Fees and Compensation" section in this Brochure, persons providing investment advice on behalf of our firm are registered representatives with MIS, a securities broker-dealer, and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. While we endeavor at all times to put your interests first as part of our fiduciary duty we owe, you should be aware that the receipt of additional compensation itself creates a conflict of interest.

For more information on the conflicts of interest this presents, and how we address these conflicts, please refer to the "Fees and Compensation" section of this brochure.

Rebates and Additional Compensation Received from Hilltop Securities, Inc.
MIS, our affiliated broker-dealer, and Hilltop receive various fees from clients in connection to their securities transactions. These fees include but are not limited to, transaction fees, clearing fees, account service fees, administrative services fees, document processing fees, check fees, wire fees, technology fees, etc. Additionally, MIS charges markups on some of these fees.

MIS, our affiliated broker-dealer, has entered into various agreements with Hilltop and its related entities and divisions (collectively, "Hilltop"), whereby Hilltop provides MIS certain additional compensation and rebates. Such compensation includes, but is not limited to:

- Margin Debit Balance Credits: MIS receives a 0.50% share on the aggregate margin balances of McDermott Investment Advisors, LLC client accounts that are custodied at Hilltop.
- Fee Credit Balances: MIS receives a 0.25% rebate on the fee credit balances of McDermott Investment Advisors, LLC client accounts that are custodied at Hilltop.
- Money Market Funds: MIS receives a rebate of up to 40% on Bank-Insured deposits held by McDermott Investment Advisors, LLC client accounts that are custodied at Hilltop.
- Fully-Paid Lending Program: Hilltop earns revenue from loaning client securities to other investors and market participants. A portion of that revenue will then be shared with MIS.

In addition, MIS receives a portion of the following fees that are charged by Hilltop:

- Paper document delivery fees – Up to $15/client/year
- IRA Account maintenance fees – Up to $10/client /year
- Returned check fees – Up to $15/returned check
- Domestic wire fees – Up to $15/wire transfer
- Automated Customer Account Transfer Service (ACATS) fees – Up to $50/transfer

We believe the fees charged by our custodian, Hilltop, are reasonable. However, a conflict of interest exists because our affiliates, including MIS, its registered persons, and Dean McDermott, receive additional compensation from our clearing firm. We uphold our fiduciary duty by acting in our advisory clients' best interests by recommending investments that, in our opinion, are suitable for our clients' investment needs, and by seeking best execution for client transactions and providing disclosures to advisory clients regarding conflicts of interest associated with such recommendations.

Transition Assistance Benefits from Hilltop Securities, Inc.
Additionally, we have received hard dollar benefits in the amount of $150,000 from Hilltop to cover the costs associated with moving client accounts from our previous custodian to Hilltop and other administrative tasks. This presents an additional conflict of interest. Clients should be aware of this conflict and take it into consideration in deciding whether to custody their assets at Hilltop. McDermott Investment Advisors, LLC understands its duty for best execution and considers many factors in selecting the custodian for its advisory

clients. While McDermott Investment Advisors, LLC may not always obtain the lowest commission rate, we believe the rate is reasonable in relation to the value of the services provided by Hilltop.

Recommendation of Other Advisors

We may recommend that you use a third-party adviser ("TPA") as part of our asset allocation and investment strategy. We will share in the compensation received by the TPA for managing your account. The compensation arrangement presents a conflict of interest due to a financial incentive to recommend the services of the third-party advisor. In order to address this conflict, the firm has adopted a code of ethics that obliges all associated persons to deal fairly with all clients when taking investment actions, to uphold their fiduciary duty, and put the client's interest first. Clients are not required to use the services of any TPA we recommend.

We and our related persons do not compensate, either directly or indirectly, any person or entity who is not our supervised person for client referrals.

Custody - Item 15

We directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a qualified custodian. You will receive account statements from the qualified custodian holding your funds and securities at least quarterly. The account statements from your custodian will indicate the amount of our advisory fees deducted from your accounts each billing period. You should carefully review account statements for accuracy.

If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact Dean P. McDermott, Managing Member, at (610) 882-1460.

Investment Discretion - Item 16

You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. Before we can buy or sell securities on your behalf, you must first sign our discretionary management agreement, a power of attorney, and/or a trading authorization form.

You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Please refer to the "Advisory Business" section in this Brochure for more information on our discretionary management services.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s).

Voting Client Securities - Item 17

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

Financial Information - Item 18

We are required in this Item to provide you with certain financial information or disclosures about our financial condition. We do not require the prepayment of over $500, six or more months in advance. Additionally, our firm has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and it has not been the subject of a bankruptcy proceeding.

Requirements of State-Registered Advisers - Item 19

This section is not applicable – Our firm is SEC registered.

Miscellaneous

Trade Errors
In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, you will keep the profit.

Class Action Lawsuits
We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.

Confidentiality
We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will never sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact Dean P. McDermott, Managing Member, at (610) 882-1460, if you have any questions regarding this policy.