# Part 2A of Form ADV: Firm Brochure

March 17, 2025

# **Domain Money Advisers, LLC**

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This brochure ("Brochure") provides information about the qualifications and business practices of Domain Money Advisers, LLC ("Domain Money", the "Adviser", "we', "us" or "our"). If you have any questions about the contents of this Brochure, please contact us at (646) 970-6926. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (the "SEC") or by any state securities authority.

The Adviser may refer to itself as SEC registered or as a registered investment adviser with the SEC pursuant to the Investment Advisers Act of 1940, as amended (the "Advisers Act"). These references do not imply a certain level of skill or training.

Additional information about the Adviser is also available on the SEC's website at: <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>.

# Item 2 – Material Changes

This section describes the material changes that have been made to Domain Money Advisers, LLC's Disclosure Brochure (the "Brochure") since its last annual update in October 2024. This Brochure, dated March 17, 2025, has been prepared according to the SEC's disclosure requirements.

The following material changes to this Brochure have occurred since its last annual amendment:

Advisory Business. We have added a new Membership Program.

Domain Money Advisers, LLC has a new Chief Compliance Officer, Cynthia Schlanger.

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# Item 4 – Advisory Business

Domain Money Advisers, LLC ("Domain Money", the "Adviser", or the "Firm"), founded in 2021, is an investment advisory firm that provides financial planning services to advisory clients (each a "Client") which includes working with Clients in such areas as asset allocation, portfolio reviews, cash flow and budgeting, retirement planning, real estate analysis, risk management and estate planning, and other, related consulting services. The Adviser is wholly-owned by Domain Money, Inc. ("Domain"), a privately held company headquartered in New York, New York, principally owned and controlled by Adam Dell.

This Brochure describes the flat-fee services (each an "Engagement") offered by the Adviser that covers specific topics mutually agreed by the Adviser and Client.

#### The Domain Money App

Domain offers various personal finance services on an interactive platform, the "Domain Money" app, available on smartphones and web-based (the "App"). Via the App, users may: upload their documents, schedule meetings, open a savings account, and communicate with the support and advisory teams. Non-investment advisory services are generally provided by Domain pursuant to particular documentation, and investment advisory services are provided by the Adviser pursuant to separate documentation, in each case agreed to via the App. Additionally, services provided via the App by third parties are subject to separate services agreements.

#### Financial Planning and Investment Consultation Services

The Adviser's investment advisory representatives are also Certified Financial Planners ("CFP®s") and provide Clients with financial planning and/or consulting services by phone, chat or video chat ("Services"). These Services could include, without limitation: asset allocation advice, portfolio review, employment benefits planning, planning and investing for financial goals (including retirement planning, education planning, home buying, etc.), cash flow analysis, real estate analysis, risk management, tax strategies, estate planning, or other specific needs as Clients may request.

Investment consultation could result in providing information on the types of investment vehicles available, employee stock options, investment analysis and strategies and asset selection. Our CFP®s may also assist Clients in establishing their own investment account at a selected broker/dealer or custodian of a Client's choosing.

The Adviser's services are highly dependent on receiving complete and accurate information from Clients. If a Client provides the Adviser with inaccurate or incomplete information or fails to update promptly the information provided to the Adviser when it changes, the quality and applicability of the Adviser's investment advisory services could be materially impacted.

In addition, other information about a Client's personal financial situation that may not be elicited through the Adviser's onboarding process could inform the Adviser's advice if it were provided.

Our main offering is a membership to our advisory services that start with an Initial Engagement financial plan in year one and then turn into recurring subscription where each year a Client receives a financial plan update and an allotment of live meetings plus unlimited access to their advisor via email or chat. Our memberships are on a fixed fee basis for each year a Client is still a member. We have three levels of plans that offer various services including, but not limited to, intake sessions, plan delivery sessions, unlimited email contact with your financial planner, phone access to your financial planner depending on what level you choose. If the allotment of meetings are used in a year, there are also add-on services that can be purchased coaching sessions. annual plan updates, etc.) Please refer (i.e. https://www.domainmoney.com/our-process for further information on our plan levels and also please see more information under Item 5 - Fees and Compensation.

Typically, an Initial Engagement includes the following process:

- An initial "Initial Consultation" (approximately 30 min) during which time the Adviser will gather all pertinent financial information and statements, and discuss your financial goals;
- Follow-up phone calls/emails to clarify information
- A broad-based, customized personal financial plan;
- A plan delivery meeting (approximately one hour and a half) to discuss your plan in detail and develop a course of action to implement it;
- Meetings may be conducted in person or over the phone

Each subsequent year follows a similar process and include:

- An allotment of 60-minute coaching sessions with your dedicated CFP® for either milestone-based meetings, ad-hoc questions, life events, etc. based on the membership level
- An annual update of the Financial Plan with detailed actions items
- o The membership auto-renews on a yearly basis

To the extent requested by a client, the Adviser may recommend the services of other professionals for certain non-investment implementation purposes (i.e., attorneys, accountants, insurance representatives, etc.).

#### **Client-Tailored Services**

Our Services may be broad-based or more narrowly focused, depending on a Client's requests or needs. Note that when Services focus only on certain areas of a client's specific interest, the client's overall financial situation may not be fully addressed due to the limitations the Client has established. In all instances, Clients retain full discretion over all implementation decisions and are free to accept or reject any recommendation the Adviser makes. Domain Money does not manage or obtain discretionary authority (i.e., limited power of attorney) over any of Clients' savings or investment accounts unless otherwise covered in separate agreement as part of the Domain Money App services.

#### Wrap Fee Programs

Domain Money does not participate as a sponsor or participant in any wrap fee programs.

# Client Assets Under Management

Due to the nature of the services provided, the Adviser does not have reportable client assets under its management.

#### **General Account Information**

Client Onboarding. In order to become an investment advisory client, a Client completes a brief interview over the telephone conducted by one of the Adviser's CFP®s to determine the scope of services to be provided. The Adviser will also ensure all material conflicts of interest are disclosed regarding the Adviser which could be reasonably expected to impair the rendering of unbiased and objective advice. If the Client wishes to engage the Adviser, the Client must pay a deposit (see "Charged Prepayment of Client Fees" section below) and accept the Terms of Services as well as the Privacy Policy presented at the time of payment. Thereafter a discussion and analysis will be conducted to determine the Client's financial need, goals, holdings, etc.

Customer support personnel are available to assist Clients in understanding the offerings and with opening accounts, while the CFP®s are available to assist Clients in understanding the different financial plans available and in helping to evaluate investment objectives, financial goals and risk tolerances. The purpose of the onboarding process is to enable the Adviser to gather sufficient information on the Client to enable the Adviser to provide tailored investment advice to the Client.

Depending on the scope of the engagement, the Adviser may also require current copies of the following documents early in the process:

- Wills, codicils and trusts
- Insurance policies
- Mortgage information
- Tax returns
- Current financial specifics including W2's or 1099s
- Information on current retirement plans and benefits provided by Client's employer
- Statements reflecting current investments in retirement and non-retirement accounts
- Completed risk profile questionnaires or other forms provided by the Adviser

The Adviser may, but is not obligated to, verify the information the Client has provided which will then be used in the financial planning or investment advisory process.

#### **Investment Advisory Services**

The Adviser provides investment advice principally via the financial plans it provides the Client. which are based on the Adviser's analysis of the suitability of the Adviser's investment recommendation for the Client, and the Client's goals, risk tolerance, time horizon and investment objectives (and subject to the Client's agreement with its assigned risk category).

Subject to the Adviser's fiduciary duties, Clients retain absolute discretion over security selection and other implementation decisions and are free to accept or reject any recommendation from the Adviser.

Clients are encouraged to update their plan as soon as material changes occur in their lives and to re-engage the Adviser's financial consulting services on at least an annual basis for the purpose of reviewing and updating Adviser's previous recommendations and/or services.

#### Consulting/Support Services

The Adviser's CFPs provide Clients with financial planning and/or consulting services by phone, chat, video chat or office visit. These services could include, without limitation: asset allocation, portfolio review, employee benefits planning, investing for financial goals (including retirement planning, education planning, home buying, etc.) tax harvesting and establishing tax-advantaged accounts.

To the extent requested by a Client, Adviser may recommend the services of other professionals for certain non-investment implementation purposes (i.e., attorneys, accountants, insurance representatives, etc.).

#### Other Services

Our Chief Money Officer and Board Member, Joanne Bradford, is also a Strategic Advisor for Wealth.com, a company that helps individuals and families with estate planning. Domain Money has entered into an agreement with Wealth.com to provide a client platform which enables Domain Money clients to create estate plans. If any Domain Money clients wish to use Wealth.com, they can do so without charge from either Domain Money or Wealth.com. Domain Money pays a flat annual fee to Wealth.com for the use of their platform and making it available to Domain Money Clients. Because Domain clients do not pay for this service, and Domain Money does not receive any fee for referrals, we do not feel that a conflict exists.

#### Scope and Limits of Services Provided

Topics or Areas Not Covered By a Plan. Our financial plans do not address every aspect of a client's financial life (e.g., areas not covered include analysis of property and casualty, homeowners, and excess liability coverage, etc.). In addition, a topic may not be included in your financial plan for a variety of reasons (for example, because we did not receive sufficient data from you to complete an analysis); unless we explicitly state otherwise, you should not take any such omission as an indication that the topic is not applicable to your particular financial situation. Also, unless otherwise requested, our services will not include an analysis of your estate planning documents and/or income tax returns. You should seek the counsel of your legal and tax advisors for a complete analysis of your estate and death tax liabilities.

No Verification of Outside Assets Analyzed. In developing a financial plan for you, we may consider and analyze information relating to assets that you hold at other financial institutions if you have provided us with the relevant information. In considering such information, we will assume that the information that you have provided is accurate and will not take any steps to verify or ensure the accuracy of information regarding any assets.

No Tax or Legal Advice. We do not provide tax or legal advice. You should not consider any information that is presented in a financial plan regarding potential tax considerations as tax or legal advice, and should not use such information for the purpose of avoiding any tax penalties or liabilities. As we do not provide legal or tax advice, we recommend coordinating with your independent legal and tax advisers during the financial planning process so that they may assess any legal and tax issues relating to the strategies we recommend. If you are not comfortable involving those advisers during our financial planning arrangement with you, you should separately consult with your legal or tax advisors to review your personal circumstances.

<u>Residency Assumption in Our Plans.</u> Our Services assume that you are a U.S. citizen or resident, and are subject to U.S. taxes. Our financial planning services may therefore not be applicable to or appropriate for you if you are subject to other tax jurisdictions and requirements.

<u>Implementation of Recommendations</u>. You are encouraged to review all advice within the full context of your personal financial picture and seek your own tax, legal and other professional advice to inform your independent evaluation of our advice. Subject to our fiduciary duty, you retain absolute discretion over all implementation decisions and are free to accept or reject any recommendation from us.

# **Item 5 – Fees and Compensation**

#### Method of Compensation and Fee Schedule

We offer our Initial Engagements on a fixed fee basis and are then renewed on an annual basis as described below.

The Essentials Plan is billed at \$3,200 for Year 1 and is renewed annually for \$1,800.

The Strategic Plan is billed at \$4,500 for Year 1 and is renewed annually for \$2,500.

The Comprehensive Plan is billed at \$7,800 for Year 1 and is renewed annually for \$4,500.

Clients who require any additional assistance or further services outside the scope of the noted engagements may be billed separately and those services will be charged on an hourly basis or based on an agreed upon fixed fee. The firm's current hourly rate is \$500, assessed in 30-minute increments, and a partial increment will be treated as a whole (i.e. 15 minutes will be billed for 30).

For all of our engagements, the Services and the fees will be detailed in your invoice, via electronic communication, and/or via the Adviser's App or Website. The Adviser believes our fees are reasonable in light of the services to be provided, as well as the experience and expertise of the assigned CFP<sup>®</sup>. Such fees may be negotiable; we may discount such fees from time to time; comparable services may be provided elsewhere and potentially for a lower fee.

#### Client Payment of Fees

Clients will be charged directly for our services using the credit card they used when they paid their deposit,

whether the engagement involves hourly or fixed fee assessments. We will not withdraw fees from a Client investment or bank account for our services.

#### Charged Prepayment of Client Fees

**Advance Payment for Certain Services**. The Adviser requires an initial deposit of 10% to initiate its Initial Engagement services which is applied to the final engagement assessment. For ad-hoc a la carte coaching sessions, the payment will be 100% upfront.

#### **Termination of Services**

Either you or we may terminate the agreement at any time, which is required to be in writing. Termination of services is effective upon receipt of the notice. Should you verbally notify us of the termination and, if in two business days following this notification we have not received your notice in writing, we will make a written notice of the termination in our records and send you our own termination notice as a substitute.

If you choose to terminate services following the execution of the agreement, you will be billed for any time expended in providing you with our services, along with any reasonable out-of-pocket (itemized) expenses that may have incurred on your behalf. In this situation you will be billed on an hourly basis at the Adviser's current rate. In the case of prepaid fees, we will promptly return any unearned amount upon receipt of a written termination notice, unless those pre-paid fees are related to the Domain+ membership. Domain+ membership fees are not refundable once paid except for the first year and within the first 90 days from sign up.

#### External Compensation for the Sale of Securities to Clients

We are engaged for fee-only financial planning and investment consultation services, and we attempt to recommend "no load" investments whenever appropriate. We will not be paid a commission on your purchase of an insurance contract or securities investment that we may recommend.

We do not receive "trailer" or SEC Rule 12b-1 fees from an investment company offering that we may recommend. Fees charged by issuers of these types of investments are detailed in their prospectus or product description and you are encouraged to read these documents before investing. Our firm and its associates receive none of these described or similar fees or charges.

You will always have the option to purchase a recommended investment vehicle or insurance policy through a service provider of your choice.

#### Item 6 – Performance Based Fees and Side-by-Side Management

Neither Domain Money nor the Adviser charge any performance-based fees to any Client in respect of any Account.

Side-by-Side Management refers to active management of accounts for different Clients. The Adviser does not actively manage Client accounts and does not allocate transactions among Clients.

# Item 7 – Types of Clients

For Financial Planning, the Adviser serves individuals and their families to assist them in meeting their financial objectives. The Adviser's ability to provide our service and advice depends on access to important information.

Accordingly, you are expected to provide us with an adequate level of information and supporting documentation throughout the term of the engagement, including but not limited to source of funds, income levels, your (or your legal agent's) authority to act on behalf of the account, among other information. This helps us determine the appropriateness of our financial planning or investment strategy for you and your account.

It is very important that you keep us up to date on significant changes that may call for an update to your financial and investment plans. Events such as job changes, early retirement, marriage or divorce, or the purchase or sale of a home or business can have a tremendous impact on your circumstances and needs. If we are aware of such events, we can make the adjustments needed to your plan or advice in order to keep you on track toward your goals.

We do not require minimum income levels, minimum level of assets, or other conditions for our services. We reserve the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, pre-existing relationships, or as otherwise may be determined by a Domain Money principal. We also reserve the right to decline services to any prospective client for any reason.

Generally, the Adviser only provides investment advice to Clients who are, as applicable, U.S. citizens, or lawful residents of the U.S. who have a social security number or individual taxpayer identification number, are located in the U.S., have a valid U.S. residential mailing address, and maintain a U.S. banking account.

#### Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

#### Methods of Analysis and Investment Strategies

#### Method of Analysis

If we are engaged to provide investment advice, we will first gather and consider several factors, including your:

- current financial situation
- current and long-term needs
- investment goals and objectives
- level of investment knowledge
- tolerance for risk

Typically, we employ a fundamental analysis to develop our investment strategies. This includes evaluating economic factors such as interest rates, current state of the economy, future growth of an issuer or sector, among others.

Our research and recommendations may be drawn from sources that include financial publications, investment analysis and reporting services, research materials from outside sources, annual reports, prospectuses or other regulatory filings, and company press releases.

We make asset allocation and investment decisions based on the noted factors which we will then discuss with you how, in our best judgment, to meet your objectives while at the same time seeking a prudent level of risk exposure.

#### **Investment Strategies**

Our investment advice incorporates the principles of Modern Portfolio Theory (MPT), whose concepts are based on rigorous, long-term academic research. The major premises of MPT include:

Markets are typically fairly efficient (though not always rational); therefore, it is extremely difficult to gain a competitive edge by exploiting market anomalies

Risk and reward are highly correlated. Over time, riskier assets provide higher expected returns to compensate investors for accepting greater risk

Adding high-risk, low-correlation asset classes to a portfolio can actually reduce volatility/risk while increasing expected rates of return

Proper diversification of a portfolio can maximize expected return for a certain level of risk; likewise, it can minimize risk for a certain expected rate of return.

We primarily utilize index mutual funds and ETFs to provide broad diversification within an asset class. The index funds we utilize generally aim to replicate well-known, widely-followed indices and are readily marketable

#### Method of Analysis for Financial Planning

#### Method of Analysis

When we engage in financial planning, we will first request several pieces of information depending on the goals of the planning exercise and the type of plan purchased. We use documents provided by you via the Domain Money website or app in order to run calculations regarding cashflow, net asset value, assets needed for retirement and current progress, among other analyses that help us get as holistic of a financial picture as we can.

As part of the analysis, the documents uploaded through our portal may be parsed using traditional (i.e., machine learning) or generative artificial intelligence depending on the type of documents and those parsed values will be reviewed and corrected as needed by our human staff before any recommendations are derived.

Furthermore, if we conduct an expense analysis for budgeting we may use generative artificial intelligence models to classify individual transactions in order to map them to approachable budget categories. These categorizations will also be reviewed by our human staff to assure accuracy and will be corrected as needed.

## Investment Strategy Risks and Material Risks

#### **Investment Strategy Risks**

While we believe our strategies and investment recommendations are designed to potentially produce the highest possible return for a given level of risk, we cannot guarantee that an investment objective or planning goal will be achieved.

Some investment decisions may result in loss, including potential loss of the original principal invested. Each client must be able to bear the various risks involved in the investment of account assets, which may include market, currency, interest rate, and liquidity, operational or political risk, among others.

The challenge involved in employing fundamental analysis is that information obtained may be incorrect; the analysis may not provide an accurate estimate of earnings, which may be the basis for a security's value. If a security's price adjusts rapidly to new information, a fundamental analysis may result in unfavorable performance.

When our research and analyses is based upon commercially available software, general market and financial information, or due diligence reviews, we are relying upon the accuracy and validity of the information or capabilities being provided by selected vendors, market data, and the issuers themselves. We make a reasonable effort to determine the accuracy of the information received but we cannot predict events, actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice to a client or account.

When your portfolio employs a passive, efficient markets approach (associated with MPT strategies), you will need to consider the potential risk that at times your broader allocation may generate lower than-expected returns than that from a specific asset, and that the return on each type of asset is a deviation from the average return for the asset class. We believe this variance from the "expected return" is generally low under normal market conditions if the portfolio is made up of diverse, low or non-correlated assets.

#### Security-Specific Material Risks

ETFs and mutual funds may carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees. The risk of owning these types of holdings also reflects the risks of their underlying securities.

You will need to keep in mind that investment vehicles such as ETFs and indexed funds have the potential to be affected by "tracking error risk," which might be defined as a deviation from a stated benchmark (index). Since the core of a portfolio may attempt to closely replicate a benchmark, the source of the tracking error (deviation) may come from a "sample index" that may not closely align the benchmark. In these instances, we may choose to reduce the weighting of a holding or use a "replicate index" position as part of the core holding to minimize the effects of the tracking error in relation to the overall portfolio.

Also, while many index funds and ETFs are known for their potential tax-efficiency and higher "qualified dividend income" (QDI) percentages, there are certain asset classes or holding periods within a fund or ETF that may not benefit. Shorter holding periods or certain commodities and currencies (potentially within the fund/ETF) may be considered non-qualified, therefore the investments QDI will be considered if tax efficiency is an important aspect of your investment portfolio.

# Item 9 – Disciplinary Information

The Adviser accepted an Offer of Settlement with the Securities Division of the Office of the Secretary of the Commonwealth of Massachusetts on August 22, 2022, involving late filing of a Notice filing and under which it agreed to be censured, pay a \$5,000 fine and agree to certain additional conditions. See the Adviser's Form ADV Part 1A for more information.

# Item 10 – Other Financial Industry Activities and Affiliations

The Adviser has no financial industry affiliations (other than as described herein).

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

The Adviser has adopted and implemented a Code of Ethics, which sets forth standards of business conduct for our supervised persons. Our Code of Ethics is primarily designed to educate supervised persons about our professional ethics, emphasize our fiduciary duties to Clients, emphasize the obligations of supervised persons to comply with applicable laws, prevent the misuse of material non-public information and address conflicts of interest that could arise from personal trading by supervised persons. Among other things, we impose certain requirements on supervised persons relating to the purchase or sale of certain securities for their own accounts and the accounts of certain affiliated persons. Supervised persons generally are required to disclose and report their personal securities transactions and personal securities holdings. We also maintain certain policies and procedures designed to prevent supervised persons from misusing material non-public information.

In addition to the Code of Ethics, the Adviser has adopted and maintains a compliance program and compliance manual which sets forth various additional compliance policies and procedures that are reasonably designed to ensure compliance by the Adviser and its personnel with the Advisers Act and other applicable securities laws.

# **Item 12 – Brokerage Practices**

The Adviser is not affiliated with any bank, custodian, or broker-dealer firm ("service provider"). When we are engaged to provide investment consultation services, we will offer to use the service provider with whom your assets are currently maintained. Should you prefer a new service provider, we may provide a recommendation to you that will be based on your need, overall costs, and ease of use. We do not receive any compensation from service providers to provide recommendations to you.

It is the Firm's policy to prohibit non-cash compensation (termed "soft dollars" in certain jurisdictions), nor do we "pay up" to receive additional services from a service provider.

We periodically conduct an assessment of any service provider we recommend, which may include a review of their range of services and reasonableness of fees, among other items, in comparison to their industry peers.

We do not require or engage in directed brokerage involving client accounts. Our Clients are free to use any

particular service provider to execute their transactions and they are responsible for negotiating any terms or arrangements for their account. We will not be obligated to conduct due diligence of the client's selected service provider.

#### Item 13 – Review of Accounts

#### Schedule for Periodic Review of Client Accounts and Advisory Persons Involved

Periodic financial reviews are important, and we ask that you initiate them whenever needed. We recommend you consider that they occur on an annual basis whenever practical. These reviews are generally under a new or amended agreement and will be assessed at our then current hourly rate. You may also choose to engage us on a scheduled review basis through our Membership Program (see Items 4 and 5 for details).

Reviews will be conducted by your assigned CFP<sup>®</sup> and will normally involve analysis and possible revision of your previous financial plan or investment allocation.

#### Review of Client Accounts on Non-Periodic Basis

You may contact our firm for additional reviews when there are material changes that occur in your financial situation (i.e., loss of a job, early retirement, receipt of a significant bonus, an inheritance, the birth of a new child, or other circumstances).

The review will be conducted by your assigned  $CFP^{\mathbb{R}}$  and will involve analysis and potential revision of your financial plan or investment allocation.

Due to the nature of our advisory services, we do not have an obligation to periodically review client investment accounts, such as when there are economic or market shifts, etc.

#### Item 14 – Client Referrals and Other Compensation

#### Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

We do not engage in solicitation activities as defined by statute. All compensation paid to our firm is paid directly by our clients through financial planning and investment consultation services fees. We do not receive additional compensation when our clients engage a recommended service provider.

#### Advisory Firm Payments for Client Referrals

Investment adviser representatives of our firm may hold individual membership or serve on boards or committees of professional industry associations. Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and educational requirements.

A benefit these noted entities may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for participant firms or individual financial planners within a selected state or region. These passive websites may provide means for interested persons to contact a firm or planner via electronic mail, telephone number, or other contact information, in order to

interview the participating firm or planner. Members of the public may also choose to telephone association staff to inquire about a firm or individual planner within their area and would receive the same or similar information. A portion of our membership fees may be used so that our name will be listed in some or all of these entities' websites (or other listings).

Prospective clients locating our firm or one of our associates via these methods are not actively marketed by the noted associations. Clients who find us in this way do not pay more for their services than clients referred to us in another fashion, such as by another client. We do not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.

# Item 15 – Custody

The Adviser does not maintain custody of Client assets.

#### Item 16 – Investment Discretion

We do not allow our associates to act with discretionary authority within a client account. Should we be asked by you to assist in any trade execution (including account rebalancing) on your behalf, we will only do so with your selected service provider and with your prior approval, termed in the securities industry as non-discretionary basis (authority).

## **Item 17 – Voting Client Securities**

Domain Money does not vote proxies on behalf of Clients and does not take any action or render any advice with respect to voting of proxies or any corporate action, legal proceeding or other related matter in connection with the Client's securities. Clients retain the right to vote proxies and take any such action. It is the Client's sole responsibility on whether to vote and how to vote and whether to engage in any matter or legal proceeding.

#### Item 18 – Financial Information

Domain Money does not have any adverse financial conditions to disclose.