



**Mascoma**  
WEALTH MANAGEMENT

## **Mascoma Wealth Management LLC Part 2A of Form ADV Brochure**

80 South Main Street  
Hanover, NH 03755

**September 30, 2025**

<https://mascoma.bank/investing/mascoma-wealth-management/>

This brochure provides information about the qualifications and business practices of Mascoma Wealth Management LLC (MWM). If you have any questions about the contents of this brochure, please contact us at (603) 676-8813. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about Mascoma Wealth Management LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Mascoma Wealth Management LLC (MWM) is an SEC Registered Investment Advisor. Registration does not imply a certain level of skill or training.

## **Item 2 Material Changes**

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an advisor's disclosure brochure, the advisor is required to notify you and provide you with a description of the material changes.

Since our last annual updating amendment dated March 27, 2025 was distributed we have made the following material changes:

- We have added language in Items 4 and 10 regarding the use of sub-advisors as part of our investment management services. Please refer to these items for further details.

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## **Item 4 Advisory Business**

### **Description of Services and Fees**

Mascoma Wealth Management LLC ("MWM") is a fee-only registered investment adviser based in Hanover, New Hampshire. MWM is organized as a Registered Investment Advisor under the Securities & Exchange Commission. Our firm was originally established in March of 2013 and is a wholly owned subsidiary of Mascoma Bank of Lebanon, NH.

MWM primarily provides comprehensive financial planning and customized discretionary portfolio management services to individuals, families and non-profit institutions. MWM generally invests client assets in domestic and international stocks, exchange traded funds ("ETFs"), bonds, and no load mutual funds.

MWM works with each client to establish an appropriate investment profile at the onset of the relationship and through ongoing conversations regarding investment expectations, time horizons, risk tolerances and liquidity needs. MWM assists each client with selecting an investment objective with established asset allocation ranges for each of their accounts. Clients can impose reasonable restrictions on MWM's management of their accounts.

As of December 31, 2024, MWM client assets under management were:

- Discretionary: \$465,235,941
- Non-Discretionary: \$39,456,063
- Total Assets: \$504,692,004

### **Portfolio Management Services**

MWM provides financial advice and planning services as part of an all-inclusive service, including either discretionary or non-discretionary management of investment portfolios in accordance with individual investment objectives. All services are included as part of the overall management fee described below. If you retain our firms services, we will enter into an agreement for those services.

If you participate in our discretionary investment management services, we require you to grant our firm discretionary authority 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 granted by the investment management agreement you sign with our firm. 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 participate in our non-discretionary account services you, the client, retain discretionary authority over the account. We may provide general investment recommendations and advice but will only execute transactions with your explicit authorization and direction. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

You may make additions to and withdrawals from your account at any time, subject to our right to terminate an account. You may withdraw account assets on notice to our firm, and subject to the usual and customary securities transfer and settlement procedures. However, we design our portfolios as long-term investments and asset withdrawals may impair the achievement of your specific investment objectives.

The agreement for services will continue in effect until terminated by either party pursuant to the terms of the agreement. You will incur a pro rata charge for services rendered prior to the termination of the 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. Refunds are not applicable as our fees are payable quarterly in arrears.

Additions to your account may be in cash or securities; however, we expressly reserve the right to liquidate any transferred securities or decline to accept particular securities into your account. We may consult with you about the options and ramifications of transferring or liquidating securities. However, you are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e., contingent deferred sales charge) and/or tax ramifications. You are also advised to promptly notify our firm if there are ever any changes in your financial situation or investment objectives or if you wish to impose any reasonable restrictions upon our management services.

### **Advisory Services to Retirement Plans**

We offer various levels of advisory and consulting services to employee benefit plans ("Plan"). The services are designed to assist plan sponsors in meeting their management and fiduciary obligations to participants under the Employee Retirement Income Securities Act ("ERISA"). Pursuant to adopted regulations of the U.S. Department of Labor, we are required to provide the Plan's responsible Plan fiduciary (the person who has the authority to engage us as an investment adviser to the Plan) with a written statement of the services we provide to the Plan, the compensation we receive for providing those services, and our status. This information is outlined within the advisory management agreement.

### **Sub-Adviser Relationships**

As part of our investment management services, we may use one or more sub-advisers to assist in certain aspects of managing your account(s). We will maintain discretionary authority over the account(s) and will continue to regularly monitor the performance of your accounts managed by sub-adviser(s) to ensure your funds remain invested in line with your stated objective. If we recommend your account(s) be enrolled with a sub-adviser, you will be required to sign a form to authorizing the account Custodian, Fidelity Investments, to grant the sub-adviser limited trading authority over the account.

Any fees associated with the sub-advisers' services are separate and apart from the fees you pay to MWM. Each sub-advisers' fees and compensation arrangements are described within their firm's ADV Disclosure Brochures which will be provided to you prior to enrollment in their services and are also available upon request.

Please also refer to the *Other Financial Industry Activities and Affiliations* section for additional information related to compensation and conflicts of interest relating to our Sub-Adviser partnerships; however please note, you will not pay MWM a higher advisory fee as a result of any sub-advisory relationships.

### **Types of Investments**

We primarily offer advice and allocate your assets among ETFs, individual equity and debt securities, or mutual funds; however, as appropriate, we will also recommend other types of investments for you since each client has different needs and different tolerance for risk. We will 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. Each type of security has its own unique set of risks associated with it, 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.

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.

### **IRA Rollover Recommendations**

Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are 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. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

### **Item 5 Fees and Compensation**

Our annual fee for management services provided to discretionary and non-discretionary relationships varies (between 0.50% and 1.10% ) depending on discretion or non-discretion and upon the market value of the assets we manage on your behalf, as follows:

#### **Discretionary Account Fee Schedule**

1.10% on the first \$1,000,000  
0.90% on the next \$1,000,000  
0.75% on the next \$1,000,000  
0.50% above \$3,000,000

#### **Non-Discretionary Account Fee Schedule**

0.50% on the balance

MWM has a minimum relationship size of \$300,000 and an annual administrative minimum fee of \$3,000 for discretionary and non-discretionary relationships. We may aggregate account assets for you and your minor children, joint accounts, and/or other types of related accounts for purposes of calculating the above fee schedule. The investment management fee is billed and payable quarterly in arrears based on the average daily balance of your accounts during the previous quarter. If the agreement for services is executed at any time other than the first day of a calendar month, our fees will apply on a pro rata basis, which means that fees are payable in proportion to the number of days in the quarter for which you are a client. Fees begin accruing only after the account is funded, beginning on the next subsequent first (1st) or fifteenth (15th) day of the month, as the case may be.

In our sole discretion, we may negotiate to charge a lesser management fee based upon certain criteria such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, pro bono activities, etc.

Our Agreement and the separate agreement you sign with a financial firm for custodial and brokerage services will authorize our firm through the financial firm to debit your account for the amount of our management fee and to directly remit that management fee to our firm in accordance with applicable custody rules. The financial firm we utilize has agreed to send a statement to you no less than quarterly indicating all amounts disbursed from your account including the amount of any management fees paid directly to our firm. You should review all statements for accuracy. We will also receive a duplicate copy of your account statements.

Our annual fee for advisory services varies (between 0.30% and 0.45% ) depending upon the market value of the Retirement Plan assets, as follows:

**Employee Benefit Plan Fee Schedule**

0.45% on plans up to \$2,000,000

0.35% on plans for the next \$2,000,000

0.30% on plans over \$4,000,000

Our minimum relationship size for employer retirement plan advisory services is \$1,000,000. The investment advisory fee is billed and payable quarterly in arrears based on the quarter-end balance of the plan assets. If the agreement for services is executed at any time other than the first day of a calendar month, 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 compensation for services provided to an employee benefit Plan is based on the fee schedule listed above; however, the fee may be negotiated based on the size and complexity of the Plan and services required. The final negotiated fee will be detailed in the advisory agreement.

Our Agreement and the separate agreement you sign with a financial firm for custodial and brokerage services will authorize our firm through the financial firm to debit your account for the amount of our management fee and to directly remit that management fee to our firm in accordance with applicable custody rules. The financial firm we utilize has agreed to send a statement to you no less than quarterly indicating all amounts disbursed from your account including the amount of any management fees paid directly to our firm. You should review all statements for accuracy. We will also receive a duplicate copy of your account statements.

*Grandfathering of Fees:* Pre-existing advisory clients are subject to advisory fees in effect at the time the client entered into the advisory relationship. Therefore, fee schedules will differ among clients.

## **Additional 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 ("ETFs"). 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 ETFs (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You may also incur transaction charges and/or brokerage fees when purchasing or selling securities, mutual funds or ETFs. These charges and fees are typically imposed by the broker-dealer or custodian through whom 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, ETFs, our firm, and others. For information on our brokerage practices, please refer to the *Brokerage Practices* section of this Disclosure Brochure.

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

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 the 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 account.

## **Item 7 Types of Clients**

We offer investment advisory services to individuals, families, pension and profit sharing plans, trusts, estates, charitable organizations, municipalities, corporations, and other business entities.

MWM has an administrative minimum fee of \$3,000 per year (to be charged quarterly in arrears). In addition, MWM has a minimum relationship size of \$300,000 for managed or non-discretionary relationships, and a \$1,000,000 minimum relationship size for employer retirement plan advisory relationships. We may also combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts to take advantage of reduced fees based on tiered calculations.

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

### **Investment Philosophy:**

The fiduciary mindset drives our entire investment management process. Our process is rigorous and based on achieving the highest risk-managed returns possible within the boundaries of our client's documented risk tolerance. At the same time, we believe that we are nimble enough to adjust portfolios as market and economic conditions warrant. MWM recognizes the importance of proper asset allocation, geographic diversification, and diligent risk control in achieving a superior risk-adjusted investment return. Diversifying across non-correlated assets within a portfolio can enhance expected returns for a given level of risk and lower the risk for a given expected rate of return. This philosophy drives our approach to asset allocation among diversified asset classes. Our core

investment suite focuses on the use of exchange traded funds ("ETFs") to provide diversified broad market exposure and the lowest expenses possible. Additionally, MWM can incorporate investment options it screens for their Environmental, Social, and Governance ("ESG") attributes. We have a strong commitment to working with clients to ensure that their portfolios reflect their values.

MWM's investment approach seeks to accomplish three primary objectives:

- Provide actively managed, strategically diversified, long-term portfolios.
- Utilize passive investment vehicles as the core of our portfolios.
- Generate returns consistent with an account's stated risk tolerance.

### **Investment Strategy:**

At the inception of an advisor/client personal relationship, we will determine your investment objective through a fiduciary questionnaire designed to establish risk level, time horizon, income needs, and overall objective. Your responses are instrumental in developing your investment objective, which dictates how much should be invested in equities and fixed income in each of your accounts. You should understand that the equity portion of your portfolio is determined to be the portion of the portfolio with the greatest risk. 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.

MWM's Investment Committee partners with team members from Investment Research, Compliance, and Operations. It holds weekly meetings to design, oversee and implement the firm's investment process. The Investment Committee also leverages partnerships with some of the largest money managers in the world. On a quarterly, rotating basis, the Investment Committee invites representatives from these firms to seek thought leadership on an ever-changing macro-economic landscape. As part of these meetings, our partners also provide in-depth analysis and stress-testing of MWM's investment portfolios to ensure our core holdings remain appropriate for the current economic conditions and market reactions. Common themes among our partners are identified to mitigate partnership bias, and then evaluated for potential portfolio implementation. When assessing potential investments, we consider various criteria beyond performance, such as expense ratio, liquidity, and Morningstar rating, to ensure they meet our stringent standards. Our Investment Committee identifies investment opportunities and assesses associated risks. The Committee is responsible for analyzing various asset classes and making informed decisions on the allocation of investment capital. By carefully considering different asset classes among the global markets that offer uncorrelated rates of return, our objective is to optimize risk-adjusted returns for our clients. As an added layer of due diligence, the Investment Committee uses Moody's Analytics to provide independent interpretations of economic data.

As a fiduciary, we prioritize our clients' best interest and believe that implementing a predominantly passive approach to investing through Exchange Traded Funds (ETFs) is advantageous. Exchange traded funds offer several key benefits:

1. *Diversification:* ETFs are often designed to track market indices, allowing investors to access hundreds or thousands of securities within a single investment.
2. *Transparency:* ETFs report their holdings daily, providing investors with visibility into their portfolio's composition and ensuring close tracking of respective benchmarks. This transparency sets ETFs apart from mutual funds, which typically report holdings on a monthly or quarterly basis.
3. *Lower Trading Costs:* ETFs eliminate the need for minimum investments and do not charge front-end loads or redemption fees. This cost structure translates into significant savings for

investors.

4. **Lower Expense Ratio:** Traditional mutual funds often carry expense ratios between 0.50% and 2.00%, significantly impacting the clients' portfolio return. The average expense ratio for our client portfolios falls within the range of 0.15% to 0.25%.

Exchange traded funds ("ETFs") are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other funds, other securities or any combination thereof. The funds will have a manager that trades the funds' investments in accordance with the fund's investment objective. While ETFs generally provide broad diversification, risks can be significantly increased if the funds are 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 in a particular type of security. ETFs differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on ETFs can be reduced by the costs to manage the funds, although in general the expense ratios are significantly less than mutual funds.

**Asset Allocation:** In a continuous process of evaluating investment return and risk for global equity and fixed income markets, the Investment Committee assesses multiple asset classes focusing on growth, inflation, interest rates, current valuations, price trends and fiscal policies in every global market where we may invest. Utilizing a variety of independent sources and research, the Investment Committee decides which asset classes to invest in and which to avoid.

**Equities:** The proper equity allocation for each client is determined by that client's investment objectives and the Investment Committees' assessment of return and risk potential in both US and foreign equities. Typically, ETFs are selected for all US large, mid, and small cap companies, as well as in developed and emerging international markets. We aim to use Exchange Traded Funds ("ETFs") that combine broad diversification with very low expense ratios for most of our clients.

**Fixed Income:** When investing in fixed income securities the Investment Committee assesses economic factors, monetary policy, valuations, interest rates and risk. An evaluation of all durations in US Treasuries, Agencies, Corporates and Municipals is conducted to determine proper duration for balancing risk/reward. We may buy individual fixed income securities or ETFs for all portfolios. For high yield, multi-sector and foreign asset classes we typically use ETFs. Corporate debt securities (or "bonds") are generally safer investments than equity securities, but their risk can also vary widely based on: the financial health of the issuer; the risk that the issuer might default; when the bond is due to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same interest rate.

**Alternatives:** The Investment Committee may invest in commodities, metals, and real estate depending on the attractiveness of these asset classes relative to equities and fixed income. These asset classes can also provide added diversification and be a source of risk control in various economic cycles. When investing in these asset classes we strive to use ETFs.

## **Risk of Loss**

### **Market Risks**

Investing in securities involves risk, including the potential loss of principal. We do not represent or guarantee that our services or methods of analysis can or will insulate clients from losses due to market corrections or declines. Past performance is not an indication of future performance. The profitability of our recommendations and/or investment decisions may depend upon correctly

assessing the future course of price movements of stocks, bonds and other asset classes. There can be no assurance that MWM will be able to predict those price movements accurately or capitalize on any such assumptions.

#### *Mutual Funds and ETFs*

An investment in a mutual fund or exchange traded fund involves risk, including the loss of principal. Mutual fund and exchange-traded fund shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and exchange traded funds are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intra-day changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

Shares of exchange traded funds are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, exchange traded fund shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed based exchange traded funds and potentially more frequently for actively managed exchange traded funds. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. If a liquid secondary market ceases to exist for shares of a particular exchange traded fund, a shareholder may have no way to dispose of such shares.

ETFs may have tracking error risks. For example, the ETF investment adviser may not be able to cause the ETF's performance to match that of its Underlying Index or other benchmark, which may negatively affect the ETF's performance. In addition, for leveraged and inverse ETFs that seek to track the performance of their underlying indices or benchmarks on a daily basis, mathematical compounding may prevent the ETF from correlating with performance of its benchmark. In addition, an ETF may not have investment exposure to all the securities included in its underlying index, or its weighting of investment exposure to such securities may vary from that of the underlying index. Some ETFs may invest in securities or financial instruments that are not included in the underlying index, but which are expected to yield similar performance.

### **Item 9 Disciplinary Information**

MWM and its employees have not been involved in any legal or disciplinary events.

### **Item 10 Other Financial Industry Activities and Affiliations**

MWM and its employees are a subsidiary of and affiliated with Mascoma Bank, a mutually owned community bank headquartered in Lebanon, NH. MWM and its employees have limited access to Mascoma Bank customer's bank account information and are not able to access or see banking transactions. Mascoma Bank may provide traditional banking, credit/lending, and/or trustee services to mutual clients of MWM.

MWM may recommend that you use a sub-adviser or third-party money manager ("TPMM") based on your needs and suitability. We will not receive separate compensation, directly or indirectly, from any sub-adviser or TPMM for recommending that you use their services. Moreover, we do not have any other business relationships or affiliations with the recommended sub-advisers/TPMM(s).

- **MWM utilizes 55i, LLC ("55ip") as a sub-adviser for tax loss management and tax harvesting strategies.** 55ip's services include ongoing trading and rebalancing accounts, with a focus on tax efficiency, in accordance with your stated annual tax budget and the model portfolio strategy assigned by MWM as the "Model Provider". Please note that 55ip provides this service at no cost to you or MWM due to the allocation of JPMorgan funds within our current portfolios. This may present a conflict of interest in that we are incentivized to utilize JPMorgan funds in client accounts in order to continue being able to offer 55ip's services to clients at no added cost.
- **MWM also utilizes J.P. Morgan Investment Management Inc. ("JPMIM") as sub-adviser and TPMM for direct indexing strategies.** JPMIM builds and manages investment model portfolios designed to track specific indexes, selected by you as the client, and may use one or more of their model portfolios to manage your account.

JPMIM may invest certain client accounts and funds in certain JPMorgan Affiliated Funds managed by affiliated advisers which is a conflict of interest because JPMIM and its affiliates receive compensation when clients invest in these funds.

While MWM does not receive separate compensation, directly or indirectly, from 55ip or JPMIM, we are making this disclosure to help you understand any potential conflicts of interest as a result of these relationships.

Please refer to 55ip's and JPMIM's ADV Disclosure Brochures for additional information and potential conflicts of interest. Additional information about both Advisers is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and can be found using 55ip's CRD # 286620 or JPMIM's CRD # 107038.

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

### **Description of Our Code of Ethics**

MWM and its affiliates expect all directors, officers, employees, and agents to act in accordance with the highest standards of personal and professional integrity in all aspects of their activities and to comply with all applicable laws, regulations and company policies. We must never compromise that integrity, either for personal benefit or for MWM's purported benefit. In accepting a position with MWM, each of us becomes accountable for compliance with all applicable industry laws and the MWM Code of Ethics.

Our Code of Ethics is available to you upon request by contacting your Advisor or our office directly.

## **Participation or Interest in Client Transactions**

Neither our firm nor any of our Associated Persons has any material financial interest in client transactions beyond the provision of services as disclosed in this brochure.

## **Personal Trading Practices**

Transactions for each client generally will be effected independently but may be placed concurrently causing slight pricing differences. Our firm or our Associated Persons may not buy or sell securities for their own accounts at the same time we or persons associated with our firm buy or sell such securities for client accounts. 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 our firm shall have priority over your account in the purchase or sale of securities.

## **Item 12 Brokerage Practices**

We require that your transactions be placed through Fidelity Institutional Wealth Services and its affiliates (collectively referred to as "Fidelity"). We will only use the brokerage and custodial services of Fidelity, a securities broker-dealer and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. We will only implement our investment management recommendations after you have arranged for and furnished our firm with all information and authorization regarding accounts with the appropriate financial institution.

Factors that we consider in utilizing Fidelity as our securities broker-dealer for you include their financial strength, reputation, execution, pricing, research, and service. Fidelity enables our firm to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by Fidelity may be higher or lower than those charged by other broker-dealers. You may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction. Not all advisers require their clients to direct trades to a particular broker. By requiring that your transactions be placed with Fidelity, we may be unable to achieve the most favorable execution of your transactions and this practice may cost you more money.

We will periodically review our brokerage arrangement in light of our duty to obtain best execution for your transactions. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while we will seek competitive rates, we may not necessarily obtain the lowest possible commission rates for client transactions.

The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest. We may receive from Fidelity, without cost to our firm, computer software and related systems support, which allow us to better monitor your accounts maintained at Fidelity. We may receive the software and related support without cost because we render investment management services to clients that maintain assets at Fidelity. The software and related systems support may benefit our firm, but not you directly. In fulfilling our duties to you, we endeavor at all times to put your interests first. You should be aware, however, that our receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence our choice of broker-dealer over another broker-dealer that does not furnish

similar software, systems support, or services. Additionally, we may receive the following benefits from Fidelity through the Fidelity Institutional Wealth Services Group: receipt of duplicate client confirmation and bundled duplicate statements; access to a trading desk that exclusively services its Institutional Wealth Services Group participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information.

## **Block Trades**

We do not combine multiple orders for shares of the same securities purchased for advisory accounts we manage (the practice of combining multiple orders for shares of the same securities is commonly referred to as "aggregated trading" or "block trading"). Accordingly, you may pay different prices for the same securities transactions than other clients pay. Furthermore, we may not be able to buy and sell the same quantities of securities for you and you may pay higher commissions, fees, and/or transaction costs than other clients.

## **Item 13 Review of Accounts**

For those clients to whom we provide discretionary and non-discretionary investment management services, we monitor portfolios and security positions on a regular basis as part of an ongoing process. You are encouraged to regularly discuss your needs, goals, and objectives with our firm, and to keep us informed of any changes in this information. All personal discretionary and non-discretionary client relationships are subject to a comprehensive annual review with the intent of determining whether there have been any notable changes in your goals, risk appetite, or financial situation, and to discuss the potential impact they may have on your current investment objectives.

We will contact you at least annually regarding the need for this review. Additional reviews may be conducted at your request, or based on various circumstances, including, but not limited to, contributions and withdrawals, year-end tax planning, market moving events, security specific events, and/or changes in your risk/return objectives.

Also, at your request, we will provide you with a written report containing relevant account and/or market-related information such as inventory of account holdings and account performance.

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

The Company maintains an arrangement to pay compensation to certain employees for successfully onboarding new clients and/or assets. The compensation is for a limited period and is based on a percentage of the projected annual fees to be earned by the Company.

MWM does not pay any compensation to related or outside parties for receiving referrals.

## **Item 15 Custody**

### **Deduction of Fees**

As paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our advisory fees our investment advisory fees if your account is managed on a discretionary or non-discretionary basis. We are deemed to have custody of your assets only because

we have the ability to deduct our advisory fees from your account. Other than the deduction of advisory fees, we do not deduct any other fees from, nor have physical custody of, any of your funds and/or securities. Your funds and securities will be held with an independent, qualified custodian.

(I) We will only deduct fees as provided by your written authorization as granted through signing our advisory agreement; (II) You will receive account statements from the independent, qualified custodian(s) holding your funds and securities no less than quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact your Advisor or our office.

### **Standing Letter of Authorization**

An adviser with authority to conduct third-party transfers has access to the client's assets and therefore has custody of the client's assets in any related accounts. Transfers to one or more third parties may be effected by our firm and its associated persons, only after the client has provided written authorization to do so, otherwise client signature will be required for each individual transaction. Such written authorization is known as a Standing Letter of Authorization (SLA) or Standing Payment Instruction (SLI).

Because MWM has the ability to conduct third-party transactions for clients, we are considered to have custody. However, we do not have to obtain a surprise annual audit, as we otherwise would be required to by reason of having custody, as long as we meet the following criteria:

1. You provide a written, signed instruction to the qualified custodian that includes the third party's name and address or account number at a custodian;
2. You authorize us in writing to direct transfers to the third party either on a specified schedule or from time to time;
3. Your qualified custodian verifies your authorization (e.g., signature review) and provides a transfer of funds notice to you promptly after each transfer;
4. You can terminate or change the instruction;
5. We have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party;
6. We maintain records showing that the third party is not a related party to us nor located at the same address as us; and
7. Your qualified custodian sends you, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

### **Trustee Services**

Mascoma Bank, an affiliate of Mascoma Wealth Management, serves as trustee to certain accounts for which MWM provide investment advisory services. Those employees' acting in the capacity as trustee officer gives our firm custody over the advisory accounts for which Mascoma Bank serves as trustee as Mascoma Bank Trust Department employees are related persons of the Advisor. These accounts are held with a bank, broker-dealer, or other qualified custodian. You should carefully review account statements for accuracy.

MWM complies with the SEC's Custody Rule for the trustee services described above. Annually, the Firm is subject to a Surprise Examination by an independent accountant for these accounts.

## **Item 16 Investment Discretion**

If your account is managed on a discretionary basis, you 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. You may specify investment objectives, guidelines, and/or impose certain reasonable 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.

We may also manage advisory accounts on a non-discretionary basis, meaning specific client instruction must be granted prior to each transaction. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

## **Item 17 Voting Client Securities**

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 common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder.

## **Item 18 Financial Information**

Our firm does not have any financial condition or impairment that would prevent us from meeting our contractual commitments to you.

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*Zuzana Brochu, CFP<sup>®</sup>, President*

Telephone: 802-281-3593

**MASCOMA WEALTH MANAGEMENT**

80 South Main Street  
Hanover, NH 03755

180 Battery Street, Suite 205  
Burlington, VT 05401

Telephone: 603-676-8813  
Facsimile: 603-643-5347

<https://mascoma.bank/investing/mascoma-wealth-management/>

**April 10, 2025**

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## Item 2 Educational Background and Business Experience

**Zuzana Brochu, CFP®**

*Year of Birth: 1972*

**Title:** President

**Education:**

- University of Vermont, MBA, May 1996
- Appalachian State University, BS in Business Administration, Economics, May 1994

**Business Background:**

- 10/2022 - Present: Mascoma Wealth Management LLC, President
- 1/2018 - 10/2022: People's United Advisors, Wealth Management
- 6/2002 - 1/2018: People's United Bank, Wealth Management

*Certifications: CFP®*

**CERTIFIED FINANCIAL PLANNER™ Professional**

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at [www.cfp.net](http://www.cfp.net).

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

**Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.

**Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.

**Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.

**Ethics** – Satisfy the *Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement* and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

**Ethics** – Commit to complying with CFP Board's *Code and Standards*. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning.

CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client. **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

### **Item 3 Disciplinary Information**

Ms. Brochu does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

### **Item 4 Other Business Activities**

Ms. Brochu does not have any other business activities, nor does she receive any additional compensation outside of her role with Mascoma Wealth Management.

### **Item 5 Additional Compensation**

Please refer to Item 4 above.

### **Item 6 Supervision**

As the President of Mascoma Wealth Management, Zuzana Brochu supervises the advisory activities of our firm. Zuzana Brochu can be reached at the phone number listed on the cover of this brochure.

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**Matthew D. Dattilio, CFP<sup>®</sup>**, Chief Investment Officer

Telephone: 603-443-8652

**MASCOMA WEALTH MANAGEMENT**

80 South Main Street  
Hanover, NH 03755

Telephone: 603-676-8813  
Facsimile: 603-643-5347

<https://mascoma.bank/investing/mascoma-wealth-management/>

**April 8, 2025**

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## Item 2 Educational Background and Business Experience

**Matthew D. Dattilio, CFP®**

*Year of Birth:* 1988

**Title:** Chief Investment Officer

### **Education:**

- Bryant University, Certificate in Financial Planning, June 2017
- University of Vermont, BS Business Administration, May 2011

### **Business Background:**

- 02/2017 - Present: Mascoma Wealth Management LLC,  
12/2022 Chief Investment Officer  
02/2017 - 12/2022 Senior Portfolio Manager
- 11/2012 - 02/2017: Mascoma Savings Bank, Associate Financial Consultant
- 09/2013 - 02/2017: LPL Financial LLC, Registered Representative
- 05/2012- 10/2012: Frazer Agency, Insurance Agent

*Certifications:* **CFP®**

### **CERTIFIED FINANCIAL PLANNER™ (CFP®)**

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**Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.

**Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

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**Continuing Education** – Complete 30 hours of continuing education hours every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

### **Item 3 Disciplinary Information**

Mr. Dattilio does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

### **Item 4 Other Business Activities**

Mr. Dattilio does not have any other business activities, nor does he receive any additional compensation outside of his role with Mascoma Wealth Management.

### **Item 5 Additional Compensation**

Please refer to Item 4 above.

### **Item 6 Supervision**

Zuzana Brochu is responsible for the supervision of Matthew D. Dattilio. This supervision extends to reviewing business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Ms. Brochu at the phone number listed on the cover of this brochure.

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*Jeffrey Nowell, Senior Wealth Advisor, SVP of Client Relationship  
Management*

Telephone: 802-489-7404

**MASCOMA WEALTH MANAGEMENT**

80 South Main Street  
Hanover, NH 03755

180 Battery St. Suite 205  
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## **Item 2 Educational Background and Business Experience**

**Jeffrey Nowell**

*Year of Birth:* 1975

**Title:** Senior Wealth Advisor, SVP of Client Relationship Management

### **Education:**

- Wake Forest University School of Law, JD, May 1999
- The University of Georgia, BA Political Science, June 1996

### **Business Background:**

- 9/2021 - Present: Mascoma Wealth Management,  
1/2025 SVP of Client Relationship Management  
9/2021 Senior Wealth Advisor
- 11/2008 - 9/2021: People's United Advisors, Sr. Relationship Manager

## **Item 3 Disciplinary Information**

Mr. Nowell does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

## **Item 4 Other Business Activities**

Mr. Nowell does not have any other business activities, nor does he receive any additional compensation outside of his role with Mascoma Wealth Management.

## **Item 5 Additional Compensation**

Please refer to Item 4 above.

## **Item 6 Supervision**

As the President of Mascoma Wealth Management, Zuzana Brochu supervises the advisory activities of Jeffrey Nowell. Zuzana Brochu can be reached at the phone number listed on the cover of this brochure.

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*Susan Winchester, ChFC<sup>®</sup>, CASL<sup>®</sup>, Senior Wealth Advisor*

Telephone: 603-443-8716

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## Item 2 Educational Background and Business Experience

**Susan Winchester, ChFC®, CASL®**

*Year of Birth: 1957*

**Title:** Senior Wealth Advisor

**Education:**

- Southern New Hampshire University, MS Master's in Public Administration, May 1987

**Business Background:**

- 4/2023 - Present: Mascoma Wealth Management LLC, Senior Wealth Advisor
- 6/2020 - 4/2023, Ledyard Financial Advisors, Senior Financial Advisor

*Certifications:* **ChFC®, CASL®**

**Chartered Financial Consultant® (ChFC®)**

This designation is issued by The American College and is granted to individuals who have at least three years of full-time business experience within the five years preceding the awarding of the designation. The candidate is required to take seven mandatory courses which include the following disciplines: financial, insurance, retirement and estate planning; income taxation, investments and application of financial planning; as well as two elective courses involving the application of the aforementioned disciplines. Each course has a final proctored exam and once issued, the individual is required to submit 30 hours of continuing education every two years.

**Chartered Advisor for Senior Living (CASL®)**

The Chartered Advisor in Senior Living® designation shows a commitment to helping aging clients achieve financial security now and into the future. The CASL® helps advisors lead clients from middle age through retirement and assist them with the management, preservation, and transfer of wealth. Those awarded the designation advise clients on financial and/or practical matters relating to their retirement years or on issues dealing with aging for at least three of the five years preceding the awarding of the designation. There are five required courses, equivalent to 15 semester credit hours. Once certified, the candidate is required to take 15 hours of continuing education requirements every two years (required for recertification of legacy designation).

## Item 3 Disciplinary Information

Ms. Winchester does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

## Item 4 Other Business Activities

Ms. Winchester does not have any other business activities, nor does she receive any additional compensation outside of her role with Mascoma Wealth Management.

## Item 5 Additional Compensation

Please refer to Item 4 above.

## **Item 6 Supervision**

Jeffrey Nowell is responsible for the supervision of Susan Winchester. This supervision extends to reviewing business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Nowell at the phone number listed on the cover of this brochure.

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*Jonathan L. Cottrell, Senior Wealth Advisor*

Telephone: 603-443-8652

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80 South Main Street  
Hanover, NH 03755

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## **Item 2 Educational Background and Business Experience**

**Jonathan L. Cottrell**

*Year of Birth:* 1963

**Title:** Senior Wealth Advisor

### **Education:**

- Babson College Olin School of Business, MBA BUSINESS, 9/1997 - 11/2000
- Wittenburg University, BA Business, 9/1982 - 11/1987

### **Business Background:**

- 4/2024 - Present: Mascoma Wealth Management, Senior Wealth Advisor
- 6/2022 - 4/2024: Boston Financial Management LLC,  
8/2022 Investment Adviser Representative  
6/2022 Managing Director
- 7/2016 - 6/2022: Clearstead Trust pka Atlantic Trust Company of Maine, Senior Portfolio Manager & Trust Officer

## **Item 3 Disciplinary Information**

Mr. Cottrell does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

## **Item 4 Other Business Activities**

Mr. Cottrell does not have any other business activities, nor does he receive any additional compensation outside of his role with Mascoma Wealth Management.

## **Item 5 Additional Compensation**

Please refer to Item 4 above.

## **Item 6 Supervision**

Jeffrey Nowell is responsible for the supervision of Jonathan Cottrell. This supervision extends to reviewing business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Nowell at the phone number listed on the cover of this brochure.

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*Madalyn "Maddie" Dow, CFP<sup>®</sup>, Senior Wealth Advisor*

Telephone: 603-443-8707

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## Item 2 Educational Background and Business Experience

**Maddie Dow, CFP®**

*Year of Birth:* 1993

**Title:** Senior Wealth Advisor

### **Education:**

- University of New Hampshire, BA English, May 2015

### **Business Background:**

- 1/2024 - Present: Mascoma Wealth Management, Senior Wealth Advisor
- 2/2023 - 2/2024: LPL Financial LLC, Registered Representative/Investment Adviser Representative
- 2/2023 - 1/2024: Community Financial Services Group, Wealth Advisor
- 11/2017 - 1/2023: Infinex Investments, Inc.
  - 11/2018 Investment Adviser Representative
  - 1/2017 Registered Representative
- 1/2017 - 2/2023: NH Trust, Financial Advisor

*Certifications:* **CFP®**

### **CERTIFIED FINANCIAL PLANNER™ (CFP®)**

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### **Item 3 Disciplinary Information**

Mrs. Dow does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

### **Item 4 Other Business Activities**

Maddie Dow currently has an active insurance license and, while she does not, at present, sell insurance products, should she recommend an insurance product to you she would be entitled to receive a commission on such sale. In that case, the acceptance of such compensation would create a conflict of interest which we are required to disclose. In light of that, Mrs. Dow does not currently sell any insurance products.

### **Item 5 Additional Compensation**

Please refer to Item 4 above.

### **Item 6 Supervision**

Jeffrey Nowell is responsible for the supervision of Maddie Dow. This supervision extends to reviewing business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Nowell at the phone number listed on the cover of this brochure.

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*Mike Hemingway, Wealth Advisor*

Telephone: 603-443-8709

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## **Item 2 Educational Background and Business Experience**

**Mike Hemingway**

*Year of Birth:* 1992

**Title:** Wealth Advisor

### **Education:**

- Bentley University, BS Management, May 2014

### **Business Background:**

- 06/2020 - Present: Mascoma Wealth Management, Wealth Advisor  
02/2020 - 06/2020, Office Manager
- 06/2019 - 02/2020, Mascoma Bank, Cash Management Support
- 02/2019 - 06/2019: Citizens Securities, Inc., Licensed Banker
- 12/2018 - 05/2019: Citizens Bank, Associate Licensed Banker  
04/2018 - 12/2018, Universal Banker

## **Item 3 Disciplinary Information**

Mr. Hemingway does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

## **Item 4 Other Business Activities**

Mr. Hemingway does not have any other business activities, nor does he receive any additional compensation outside of his role with Mascoma Wealth Management.

## **Item 5 Additional Compensation**

Please refer to Item 4 above.

## **Item 6 Supervision**

Jeffrey Nowell is responsible for the supervision of Mike Hemingway. This supervision extends to reviewing business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Nowell at the phone number listed on the cover of this brochure.

FORM ADV Uniform Application for Investment Adviser Registration  
Part 2B: Brochure Supplements  
Investment Adviser Representatives and/or Supervised Persons:  
Supplemental information  
Item 1: Cover Page

*Matthew Little, Wealth Advisor*

180 Battery St. Suite 205  
Burlington, VT 05401

Telephone: 802-280-4976

**MASCOMA WEALTH MANAGEMENT**

80 South Main Street  
Hanover, NH 03755

Telephone: 603-676-8813  
Facsimile: 603-643-5347

<https://mascoma.bank/investing/mascoma-wealth-management/>

**April 10, 2025**

*This brochure supplement provides information about the qualifications and business practices of these above-named representative as investment adviser representative of Mascoma Wealth Management. This information is provided as a supplement to the Form ADV Part 2A which has been provided for your review. Should you have any questions about this supplement, or if you have not received the Form ADV Part 2A please contact the firm immediately.*

*The information in this brochure supplement has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Please note, where this brochure supplement may use the terms "registered investment adviser" and/or "registered," registration itself does not imply a certain level of skill or training.*

*Additional information about the firm and its representatives is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **Item 2 Educational Background and Business Experience**

**Matthew Little**

*Year of Birth:* 1986

**Title:** Wealth Advisor

### **Education:**

- University of Louisville - Louis D. Brandeis School of Law, JD, May 2013
- University of Vermont, BA Political Science, May 2009

### **Business Background:**

- 2/2024 - Present: Mascoma Wealth Management LLC, Wealth Advisor
- 1/2016 - 03/2025: The Law Office of Matthew C. Little PLLC, Attorney at Law

## **Item 3 Disciplinary Information**

Mr. Matthew Little does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

## **Item 4 Other Business Activities**

Mr. Little does not have any other business activities, nor does he receive any additional compensation outside of his role with Mascoma Wealth Management.

## **Item 5 Additional Compensation**

Please refer to Item 4 above.

## **Item 6 Supervision**

Jeffrey Nowell is responsible for the supervision of Matthew Little. This supervision extends to reviewing business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Nowell at the phone number listed on the cover of this brochure.