



VERDE WEALTH GROUP, LLC

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This brochure provides information about the qualifications and business practices of Verde Wealth Group, LLC (“VERDE”). If you have any questions about the contents of this brochure, please contact us at 713-929-3250 or info@verdewealth.com. 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.

Additional information about VERDE WEALTH GROUP is also available on the SEC’s website at <https://adviserinfo.sec.gov/>.

VERDE WEALTH GROUP is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an investment adviser provide you with information that you may use to determine whether to hire or retain the investment adviser.

ITEM 2 MATERIAL CHANGES

The following is a summary of material changes to Part 2A of Form ADV since the last annual amendment filed with the SEC and the Texas Securities Board (the “TSB”) on June 21, 2022. This section only reflects material changes since the last other-than-annual amendment of the brochure.

We will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our business’ fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

Summary of Material Changes:

General Changes

- For consistency, “Valmark Advisers, Inc.” was abbreviated to (“VAI”) and Executive Insurance Agency, Inc was abbreviated to (“EIA”), throughout the document.

Item 4 Education & Business Standards

- Clarified that Investment Adviser Representatives (“IAR”) of VERDE are also registered investment adviser representatives of VAI, a registered investment adviser.

Item 5 Fees Relating to Other Financial Industry Activities and Affiliations

- Indicated that VERDE IARs may generate commissions and compensation through their affiliation with an insurance agency and insurance companies.

Item 14 Client Referrals and Other Compensation

- Elaborated that Clients of VERDE may also be Clients of EIA and described the special relationships and compensations with providers.

Additional information about VERDE is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s website also provides information about any persons affiliated with VERDE who are registered, or are required to be registered, as investment adviser representatives of VERDE.

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ITEM 4 ADVISORY BUSINESS

DESCRIPTION OF VERDE WEALTH GROUP, LLC

VERDE WEALTH GROUP, LLC (“VERDE”) is a limited liability company, founded in 2010, and organized under the laws of and domiciled in the state of Texas. VERDE is 100% owned by its President, Georgie M. Hrdlicka. VERDE is also a Registered Investment Adviser “RIA” registered with the state of Texas, pursuant to the requirements of the Investment Advisors Act of 1940, as amended, (the “Advisers Act”) and the Texas Securities Act, as amended (the “TSA”). Verde’s services and fee arrangements are described in the following pages. This narrative provides Clients with information regarding Verde and the qualifications, philosophies, business practices, and nature of advisory services that should be considered before becoming a Client of VERDE.

SCOPE OF SERVICES

VERDE’s desire is to build a relationship with Clients and in doing so offers scalable service arrangements designed to best fit the Client’s needs. VERDE works with a Client to develop a written Financial Plan, provide consulting services or project-based work on specific issues or areas that are of concern to a Client. VERDE provides Financial Planning and Consultative Services to Clients pursuant to a written Financial Planning Agreement. VERDE may also provide Consultative Services to Clients concerning financial products that do not involve securities.

FINANCIAL PLANNING

VERDE offers Financial Planning primarily to individuals, business owners, trusts, estates, pensions and corporations. Verde’s mission is to offer holistic Financial Planning by providing integrated and independent solutions unique to each Client. VERDE’s philosophy is that a personalized Financial Plan should be designed for the Client before the implementation of any financial or investment strategies. After ascertaining a Client’s personal, financial and investment objectives, VERDE’s team follows a Financial Planning process that involves assisting the Client to define the Client’s goals and establishing a plan of action to work toward those goals. The Financial Planning process considers the Client’s foundation, retirement planning, education, cash flow management, risk management and portfolio design. In addition, VERDE may design retirement income solutions or cash flow recommendations, explore gift, estate and legacy planning techniques and asset protection solutions as well as analyze and design insurance or investment portfolios when appropriate.

VERDE’s team creates a personalized written Financial Plan or consultative report for the Client which provides the framework for future planning decisions. The Financial Plan is designed to integrate the Clients’ goals, priorities and current financial situation. Strategies recommended to implement the Financial Plan, which may involve risk management proposals or investment solutions, typically follow the planning process. All planning recommendations are based on each individual Client’s investment objectives, risk tolerance, goals and personal situation and circumstances.

As further described in Item 10: Other Financial Industry Activities and Affiliations, VERDE maintains affiliations with a registered investment adviser, a registered broker-dealer, and a licensed insurance agency to help Clients execute or implement a Financial Plan prepared by VERDE. The Client is under no obligation to accept any recommendation from VERDE, and the Client has the sole authority with regard to the implementation, acceptance, or rejection of any recommendation or advice prepared or supplied by VERDE.

ADVICE FOR CONSULTATIONS NOT INVOLVING SECURITIES

VERDE also advises Clients concerning financial products that do not involve securities. These services can include, but are not limited to, assistance with the estate-planning process, review and assessment of insurance coverage and risk management as well as trust-owned life insurance reviews. Fees will be described in the applicable Financial Planning Services Agreement. These fees may be negotiable at the discretion of VERDE. The fee for consultations not involving securities is determined by the complexity of the planning needs and the volume of documents reviewed or analyzed.

ASSET MANAGEMENT SERVICES AND ARRANGEMENTS

VERDE does not provide asset management services to Clients under the VERDE RIA. As further described in Item 10, advisory affiliates of VERDE do provide such services and Clients of VERDE may engage with such advisory affiliates via a written investment management agreement.

SELECTION OF OTHER ADVISERS

While VERDE does not itself, in the capacity as an RIA, provide asset management services to Clients, VERDE may assist the Client in the selection of other investment advisers, money managers or asset allocation programs, including through advisory affiliates described in Item 10. VERDE will assist Clients in determining investment objectives, selecting appropriate money managers, funds or portfolios, setting restrictions or limitations on the management of the account, explaining portfolio strategies and transactions and answering Client questions. VERDE will also evaluate the overall investment strategy and performance of any third-party money manager or asset allocation program. Factors to be considered in monitoring performance may include comparing Client portfolio performance relative to certain market indices and other money managers. However, the most important consideration will be confirming that the investment strategy of the money manager matches the personal goals and risk tolerance of the Client.

EDUCATIONAL SEMINARS, WORKSHOPS OR SERVICES

VERDE may provide educational seminars, workshops or services for Clients or prospective Clients. The seminars may concern issues relating to Financial Planning, risk management, and asset allocation considerations, in the context of Client goals and risk tolerances. VERDE's seminars are not intended to provide specific investment advice to any person but are provided for general education. Any Financial Planning will be provided to Clients via a written Financial Planning Agreement.

EDUCATION & BUSINESS STANDARDS

Investment Adviser Representatives ("IAR") of VERDE hold at least a four-year degree from an accredited university. IARs must have achieved or be in the process of acquiring, required applicable professional designations such as: The series 7 and 63 or 65 examinations. IARs may also hold the Chartered Life Underwriter ("CLU"), the Chartered Financial Analyst ("CFA") and/or the Certified Financial Planner ("CFP") designation – or other equivalent designation. All IARs are required to comply with state, federal, and applicable self-regulatory organization ("SRO") continuing education requirements.

Each IAR of VERDE must be properly registered in each state in which they offer advisory services. Additionally, IARs of VERDE are registered investment adviser representative of Valmark Advisers, Inc. ("VAI"), a registered investment adviser and a registered representative with Valmark Securities, Inc. ("VSI"), a registered broker-dealer, and with Financial Industry Regulatory Authority ("FINRA").

ITEM 5 FEES AND COMPENSATION

FEE FOR SERVICES UNDER A FINANCIAL PLANNING AGREEMENT

VERDE charges fees for Financial Planning and Consultative Services provided to Clients. VERDE's desire is to build a relationship with Clients and in doing so offers flexible fee arrangements designed to best fit the Client's needs. Fees for Financial Plans, Consultative Services and project-based work are based on the scope and complexity of the work involved combined with the time necessary to complete the services. These fees will either be flat or hourly fee, depending on the circumstances, and are described in the applicable Financial Planning Agreement. In some situations, VERDE may offset planning fees based on other fees earned in the relationship. VERDE has the discretion to negotiate fees as well as offer an installment plan and credit card payment option that includes a service charge. In general, flat fees may range from \$3,000 to \$25,000 with a \$500 initial deposit upfront and the remainder due upon the initial presentation meeting, delivery of the plan or prearranged payment schedule. VERDE will provide the Client an invoice for all fees.

RETURN OF FEES UPON TERMINATION OF A FINANCIAL PLANNING SERVICES AGREEMENT

If Client terminates the Financial Planning Services Agreement

If Client terminates the Financial Planning Agreement within five (5) days of execution of the agreement, any fees collected will be returned to Client. If Client terminates the Financial Planning Agreement at any time after five (5) business days have passed since entering into the financial services agreement, but within one year of that time, VERDE will be entitled to compensation for the Financial Planning actually provided to the Client. VERDE will provide Client an invoice for any amounts due. VERDE will assess an hourly fee rate of \$500 an hour for Financial Planning provided in connection with the preparation of a Financial Plan until the date of termination of the Financial Planning Agreement. VERDE will refund amounts collected, if any, in excess of the Financial Planning fee for services provided to Client before the date of the notice of termination. If Client retained VERDE on an hourly basis for Consultative Services, VERDE will invoice the Client for services rendered up to termination at the hourly rate provided in the applicable Financial Planning Agreement. VERDE will be under no obligation to complete a Financial Plan or final Consultative recommendations in the event of termination of the Financial Planning Agreement by the Client before the services can be completed.

If VERDE terminates the Financial Planning Services Agreement

Unless terminated pursuant to a conflict of interest that arises between Client and VERDE, in the event VERDE terminates the Financial Planning Agreement within one year of the date the agreement is entered into, VERDE will return any Financial Planning service Fees assessed or incurred for services under the applicable Financial Planning Agreement. If VERDE terminates the Financial Planning Agreement pursuant to a conflict of interest that arises or of which it becomes aware after the date on which the parties enter into the agreement, VERDE will be entitled to compensation for Financial Planning provided until the date of termination. VERDE will assess an hourly fee rate of \$500 an hour for Financial Planning provided in connection with the preparation of a Financial Plan until the date of termination. VERDE will refund amounts collected, if any, in excess of the Financial Planning fees for services provided to Client before the date of the notice of termination. If Client retained VERDE on an hourly basis for Consultative Services, VERDE will invoice the Client for services rendered up to the date of termination at the hourly rate defined in the applicable Financial Planning Agreement.

FEES RELATING TO OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

As described in Item 4 and Item 10 of this brochure, IARs of VERDE are or may be IARs or registered representatives. Fees for Financial Planning and Consultative Services offered through VERDE are separate from fees earned by consultative affiliates or IARs of VERDE for investment advisory and asset management services and commission earned as registered representatives. From time to time, VERDE may host educational seminars, workshops, or services at a reduced participant rate.

As registered representatives of a broker-dealer, some IARs may effect securities transactions through a related person broker-dealer, if directed by Clients. In such instances, VERDE's IARs would receive commissions, markups, markdowns, 12b-1 fees or other sums for any securities transactions placed through the related person broker-dealer. Clients are advised that they are not required to affect their securities transactions through a related person broker-dealer and may use any broker-dealer they desire. Commissions or fees for other securities transactions may be higher or lower if placed through a related person broker-dealer than if placed through another broker-dealer. Clients should review applicable disclosures before choosing any broker-dealer to effect securities transactions or to implement applicable provisions of the Financial Plan.

VERDE IARs maintain affiliations with an insurance agency as well as serving as insurance agents with other insurance companies. Accordingly, they may generate standard and customary commissions from insurance products sold and a portion of which may be paid to them through the affiliated insurance agency.

ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

VERDE does not manage accounts and does not charge any performance-based fees (fees based on a share of capital gains or capital appreciation of the assets of a Client).

ITEM 7 TYPES OF CLIENTS

VERDE offers Financial Planning and investment services primarily to individuals, high net worth individuals, business owners, trusts, estates, pensions and corporations.

ITEM 8 METHODS OF ANALYSIS, SOURCES OF INFORMATION AND INVESTMENT STRATEGIES

VERDE, in the capacity as a RIA, does not manage Client assets and therefore does not employ an investment strategy. In preparing a Financial Plan or performing Consultative Services, VERDE relies on information or documentation provided by the Client related to Client's income, investments, taxes, estate plan, or other financial information.

VERDE follows the following process to analyze the information provided by the Client:

- Identify Investment Objectives and Risk Tolerance of Client
- Identify Financial Goals
- Collect and Review of Data and Financial Information of the Client
- Identify Issues
- Review Available Investment Solutions and the Applicable Fees and Expenses
- Create Plan and Recommendations to Meet Objectives and Address Risks

Any investment in securities involves the risk of loss that Clients should be prepared to bear.

ITEM 9 DISCIPLINARY INFORMATION

Neither VERDE nor any of its management persons have been involved in a reportable material criminal or civil action, administrative enforcement, or self-regulatory organization proceeding that would reflect upon the firm's advisory business or the integrity of the firm.

ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

VERDE has material relationships with Valmark Securities, Inc. (VSI), a broker-dealer, Valmark Advisers, Inc. (VAI) a registered investment adviser, and Executive Insurance Agency, Inc. (EIA), an insurance agency. IARs of VERDE may also act as agents of Executive Insurance Agency, Inc.

Additionally, some VERDE IARs are insurance agents with other insurance companies. Any insurance product placed through VSI OR EIA may generate standard and customary insurance commissions and other sums, a portion of which may be paid to the VERDE IARs. The receipt of commissions and other sums by its VERDE IARs for securities and insurance transactions may present a conflict of interest which will be disclosed to the Client before the Client purchases any insurance product.

VERDE's IARs are also registered representatives and supervised persons of VSI, and as such, may effect securities transactions through VSI on behalf of Clients. In such instances, the IARs would receive commissions, markups, markdowns, 12b-1 fees or other sums for any securities transactions placed through VSI. Clients are advised that they are not required to affect their securities transactions through VSI and may use any broker-dealer they desire. Commissions or fees for other securities transactions may be higher or lower if placed through VSI than if placed through another broker-dealer. VSI provides VERDE IARs registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions effected on behalf of a Client through VSI are reviewed and approved by VSI supervisory principals as required by FINRA.

IARs of VERDE are also IARs and supervised persons of VAI. As supervised persons, subject to the compliance policies of VAI, VERDE IARs may provide advisory services to Clients of both VERDE and VAI. Asset management or other investment advisory services provided by IARs of VAI will only be provided in connection with an executed investment advisory agreement and upon the delivery to the Client of the Form ADV Part 2A of VAI. VERDE IARs are authorized only to provide investment advisory services (other than Financial Planning, as described in this brochure) and work with advisory service providers and custodians that have been approved by VAI.

In addition, subject to fees as disclosed in this brochure and as directed by the Client, VERDE may utilize the services of VSI for the implementation of Financial Plans, effecting securities transactions, EIA, for the implementation of insurance transactions, or other registered investment advisers or Financial Planners for the implementations of advisory services. VERDE Clients are not required to use the services of any broker-dealer, investment adviser, or other service provider recommended by VERDE.

Geordie M. Hrdlicka is a licensed attorney. Ms. Hrdlicka, however, does not provide legal advice to or prepare or review legal documents for or on behalf of Clients of VERDE in connection with a Financial Planning Agreement or any Financial Planning or Consultative Services.

ITEM 11 CODE OF ETHICS

Under the Advisers Act, Financial Planners are considered fiduciaries with the responsibility of acting in the best interests of their Clients. Accordingly, all supervised persons of VERDE strive to meet the highest ethical standards of behavior avoiding any detriment to the Client.

VERDE has adopted a formal Code of Ethics pursuant to Advisers Act Rule 204A-1 and applicable rules promulgated pursuant to the TSA. Clients or prospective Clients of VERDE may obtain a copy of our Code of Ethics upon request. VERDE's Code of Ethics is designed to reflect the fiduciary obligation owed to its Clients. The objective of the Code of Ethics is to assure that all employees, supervised persons, and advisory affiliates clearly understand the level of commitment that is required on behalf of Clients; assure that Client interests always take priority over the interests of VERDE and its employees, supervised persons, and advisory affiliates; all trades are reported and all personal securities transactions must avoid even the appearance of conflict with the interests of Clients; and that VERDE and its supervised persons comply with all applicable federal and state securities laws, including laws concerning insider trading.

VERDE is responsible for the establishment of a compliance program and general supervision over the activities of its supervised persons. Our compliance program includes written policies and procedures to:

- Prevent and detect violations of law by our advisory personnel that can be reasonably expected.
- Analyze operations and create a system of controls to ensure compliance with applicable securities laws and cybersecurity measures.
- Inform all personnel of VERDE's policies and procedures.
- Establish an internal review system designed to provide reasonable assurance that our policies and procedures are effective and being followed.

Employees of VERDE may purchase securities for their own account that IARs of VERDE have advised Clients to purchase in connection with a Financial Plan or Consultative Services. The personal trading could be a conflict of interest. As part of its compliance policy and procedures, VERDE collects and reviews reports reflecting the personal trades of supervised persons.

ITEM 12 BROKERAGE PRACTICES

While VERDE is a related person of a registered broker-dealer and a registered investment adviser, as described in Item 10, the Client may obtain legal, accounting, investment advisory, and brokerage services from any professional source to implement the recommendations of a Financial Planning Agreement prepared by VERDE. Client will retain absolute discretion over all investment, brokerage, and implementation decisions. VERDE will cooperate with any attorney, accountant, investment adviser, or broker chosen by the Client with regard to implementation of any recommendation provided to a Client under the applicable Financial Planning Agreement.

SOFT DOLLARS

VERDE does not make it a practice to accept or participate in soft dollar benefits if offered by brokerage firms. VERDE does receive certain technology services and access to research materials and other tools based on its relationship with VSI, as described in Item 10.

TRADE AGGREGATION

While VERDE maintains relationships with a broker-dealer, as described in Item 10, trades effected for VERDE Clients are executed by the third-party money managers through its broker-dealers or custodians selected by the Client. As such, while broker-dealers selected by the Client may or may not aggregate trades on behalf of the Client, VERDE, in connection with Financial Planning and the advisory services described in this brochure, is not in a position to aggregate Client trades. Clients should review disclosures of the fees and execution practices of a broker-dealer before selecting a broker to effect securities transaction required to implement a Financial Plan or other consultative advice.

BROKERAGE FOR CLIENT REFERRALS

VERDE does not receive Client referrals in exchange for selecting or recommending a broker-dealer to a Client.

DIRECTED BROKERAGE

As described in Item 10, VERDE maintains a material relationship with VSI, a registered broker-dealer. VERDE's IARs are also registered representatives of VSI, and, as such, the IAR's may recommend the use of products and services offered through VSI. VERDE's Clients maintain the unrestricted right to decline to implement any advice as well as the right to select and use any broker they may choose to effect securities transactions. If the Client elects to have securities transactions effected through VSI, commissions or fees for other securities transactions may be higher or lower if placed through VSI than if placed through another broker-dealer. Clients are advised that, by directing brokerage transactions to VSI, VERDE may not be able to achieve the most favorable execution of Client transactions. Clients should review applicable disclosures regarding fees and execution before selecting a broker-dealer to affect their securities transactions.

ITEM 13 REVIEW OF ACCOUNTS

If you receive Financial Planning advice on an ongoing basis the Financial Plan is reviewed generally at least annually for adherence to Client goals. IARs, subject to supervision by the chief compliance officer, review Financial Plans to consider progress toward financial independence, anticipated distributions toward family legacy goals, anticipated distributions for social capital or charitable goals, as well as other Client goals. In addition, Financial Plans will be reviewed upon Client notice to VERDE of changes in personal and financial circumstances.

ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

IARs of VERDE would receive compensation in addition to referral fees and investment advisory fees as described in Item 5 in connection with advisory accounts on behalf of advisory affiliates or other persons with which VERDE maintains a material business relationship, as described in Item 10 this brochure. Additional compensation may consist of, but is not limited to, receipt of promotional incentives, sales and marketing allowances, investment research services, bundled statements, compliance guidance, and product education.

Clients of VERDE may also be customers VSI or Clients of VAI or Clients of EIA. Clients of this nature should be aware that VSI, VAI, and EIA maintain special compensation relationships with a variety of providers. These relationships may be termed "revenue sharing", "special compensation", "marketing allowances", or "due diligence compensation."

In addition, "Override" compensation is paid to VSI (or a related person of VSI) by some insurance carriers and other financial service providers. Override compensation is based upon such factors as aggregate policy premiums paid to a carrier from sales by all member offices and aggregate assets placed under financial management from sales by all member offices. The amount of compensation varies among products and carriers. VSI's complete special compensation disclosure can be viewed at www.valmarkfg.com.

ITEM 15 CUSTODY

VERDE only performs Financial Planning and Consulting Services and does not have custody of Client assets.

ITEM 16 INVESTMENT DISCRETION

VERDE performs Financial Planning only, and has no discretionary authority to manage securities accounts on behalf of its Clients.

ITEM 17 VOTING CLIENT SECURITIES

As a matter of firm policy and practice, VERDE does not exercise proxy voting on behalf of advisory Clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in Client portfolios resulting from any Financial Plan. Clients will receive their proxies or other solicitations directly from their custodian or transfer agent.

ITEM 18 FINANCIAL INFORMATION

VERDE has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to its Clients and has not been the subject of a bankruptcy proceeding. Regarding Financial Planning, no fees in excess of \$500 are collected more than six (6) months in advance and, as a result, VERDE is not required to provide financial statements in connection with this brochure.

ITEM 19 REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Geordie M. Hrdlicka is an Investment Adviser Representative and Chief Executive Officer and Principal Advisor of VERDE, LLC, a registered investment adviser. As described below, Ms. Hrdlicka is a licensed attorney, but does not provide legal services to Clients of VERDE. Ms. Hrdlicka's education, industry background and business experience include:

Education:

- B.A. Trinity University
- J.D. University of Houston Law Center
- L.L.M. in Taxation University of Houston Law Center

Examinations and Professional Designations:

- General Lines Life, Health and Variable Insurance License
- Series 7 General Securities Representative Exam
- Series 63 Uniform Securities Agent State Law Exam
- CFP® CERTIFIED FINANCIAL PLANNER™

Business Experience:

- Chief Executive Officer and Principal Advisor & Investment Adviser Representative / Verde Wealth Group, LLC / July 2010 to present
- Investment Adviser Representative / Valmark Advisers, Inc. / July 2010 to present
- Registered Representative / Valmark Securities / July 2010 to present
- Insurance Agent / Executive Insurance Agency / July 2010 to present
- Senior Vice President & Wealth Advisor / Wealth Development Strategies / December 2005 – July 2010
- Vice President & Wealth Advisor / Wealth Development Strategies / October 2001 – December 2005
- Wealth Advisor / The AFP Group / June 1998 – October 2001
- Wealth Advisor / Lincoln Financial Group – October 1997 – June 1998
- Attorney / Self-Employed / June 1996 – October 1997
- Attorney / Kirklín, Boudreaux & Leonard / August 1992 – May 1996

Ms. Hrdlicka spends time on business activities other than providing investment advice. Approximately 25% of her time is spent as an insurance agent of Executive Insurance Agency, Inc., 15% of her time as an IAR of Valmark, and 25% of her time is spent as a registered representative of VSI.

Registered investment advisers are required to disclose material facts regarding any investment related legal or disciplinary events for its executive officers, including issues involving criminal or civil actions, findings resulting from administrative proceeding before the SEC, a self-regulatory body or any other federal or state regulatory authority that would be material to your evaluation of each supervised person providing investment advice. Ms. Hrdlicka has no disciplinary record nor arbitration, bankruptcies, nor court proceeding to disclose.

Ms. Hrdlicka serves in multiple capacities with the firm, such as its Managing Member, Chief Executive Officer, Chief Compliance Officer, Principal Advisor, and Investment Adviser Representative. We recognize that not having all organizational duties segregated may create a conflict of interest; however, our firm employs policies and procedures to ensure what is believed to be appropriate recordkeeping and supervision. Certain functions may be outsourced and legal counsel consulted to assist in these efforts when deemed necessary.