



Nicholas Ventimiglio, CDFA, Inc.

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San Ramon, CA 94583

925-824-3191

www.EastBayCDFA.com

03/15/16

This Brochure provides information about the qualifications and business practices of Nicholas Ventimiglio, CDFA, Inc. If you have any questions about the contents of this Brochure, please contact us at 925-824-3191 or nick@eastbaycdfa.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Nicholas Ventimiglio, CDFA, Inc. 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 Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Nicholas Ventimiglio, CDFA, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.



Item 2 – Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated 03/15/16 is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting [Nicholas Ventimiglio \(President\)](#) at 925-824-3191 or nick@eastbaycdfa.com. Our Brochure is also available on our web site www.EastBayCDFA.com, also free of charge.

Additional information about [NICHOLAS VENTIMIGLIO, CDFA, INC.](#) is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with [Nicholas Ventimiglio, CDFA, Inc.](#) who are registered, or are required to be registered, as investment adviser representatives of [Nicholas Ventimiglio, CDFA, Inc.](#)



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Item 4 – Advisory Business

ADVISORY SERVICES

Nicholas Ventimiglio, CDFA, Inc. (NICHOLAS VENTIMIGLIO, CDFA, INC.) provides investment supervisory services, defined as giving continuous advice to a client or making investments for a client based on individual needs. Through personal discussions and fact finders, a client's goals and objectives are established. Based on these goals and objectives, NICHOLAS VENTIMIGLIO, CDFA, INC. works with the client to develop their investment strategy. NICHOLAS VENTIMIGLIO, CDFA, INC. will create, manage, and monitor a portfolio based on that strategy through the client's Investment Policy Statements ("IPS"). Account supervision is guided by the stated objectives of the client (i.e., aggressive growth, growth, growth and income, and/or income) in their IPS. The following programs describe NICHOLAS VENTIMIGLIO, CDFA, INC.'S current portfolio management services offered:

PORTFOLIO MANAGEMENT THROUGH SEI ASSET MANAGEMENT PROGRAM:

NICHOLAS VENTIMIGLIO, CDFA, INC. manages client portfolios through the SEI Asset Management Program ("Program"). NICHOLAS VENTIMIGLIO, CDFA, INC. will manage this Program on a non-discretionary basis only. In this Program, SEI Investments ("SEI") provides advisory services and due diligence to NICHOLAS VENTIMIGLIO, CDFA, INC. (but not to the client) involving the structure and design of asset allocation portfolios comprised solely of institutional mutual funds, Exchange Traded Funds, and/or separately managed accounts advised by SEI. SEI also advises NICHOLAS VENTIMIGLIO, CDFA, INC. with respect to reallocation and rebalancing of investments within such Program.

The Programs is designed as follows:

Based on client's long-term investment strategy, NICHOLAS VENTIMIGLIO, CDFA, INC. will recommend the initial model asset allocation to be used. NICHOLAS VENTIMIGLIO, CDFA, INC. will, if appropriate, suggest modifications to the allocation to more adequately address the client's individual needs as well as place reasonable restrictions on the allocation among various asset classes.

Once the client's model asset allocation has been established and approved by the client, NICHOLAS VENTIMIGLIO, CDFA, INC. will implement the model using institutional, no-load mutual funds, low cost exchange traded funds, and/or separately managed accounts advised by SEI. SEI utilizes institutional money managers only. These managers are monitored by SEI daily, monthly, quarterly, and annually to ensure that their investment styles, organizational structures, and performance remain consistent with the objectives of the mutual funds, exchange traded funds, and/or



separately managed accounts. The client may place reasonable restrictions on the nature of the funds and/or exchange traded funds and/or managers held and/or used in model. NICHOLAS VENTIMIGLIO, CDFP, INC. will assist the client in understanding and evaluating the potential impact of these restrictions on the Portfolio.

Model portfolios will be monitored quarterly and when appropriate, SEI will recommend to NICHOLAS VENTIMIGLIO, CDFP, INC. a reallocation on the portfolio based on changing economic conditions. Unless instructed otherwise, SEI will automatically reallocate portfolios and managers at the end of each quarter or when appropriate based on their recommendation. Unless instructed otherwise, SEI will automatically rebalance the client's account if the allocation among the underlying positions deviate from the prescribed quarterly allocation by greater than a 2% variance.

For the tax-managed portfolio models, the variance is 3%. Rebalancing occurs monthly with no transaction fees. Should the client's individual goals and objectives change, the client should notify NICHOLAS VENTIMIGLIO, CDFP, INC. , who will assist the client in revising their current long-term investment strategy, hence potentially making changes to their model asset allocation.

The annual fee for this Program will be charged as a percentage of assets under management, according the schedule below:

\$0-\$499,999	1.25%
\$500,000-\$999,999	1.00%
\$1,000,000-\$2,499,999	0.75%
\$2,500,000-\$4,999,999	0.50%
Over \$5,000,000	0.25%

The clients will be invoiced in arrears at the end of each calendar quarter based upon the quarter end values (market value or fair market value in the absence of market value, plus any credit balance or minus any debit balance) of the client's combined accounts during the previous quarter. Invoice will state fee due, value on which the fee is based, and how the fee was calculated. This invoice will appear on their account statement for that quarter. Clients are responsible for verifying fee computations, since custodians are not typically asked to perform this task.



FINANCIAL PLANNING:

NICHOLAS VENTIMIGLIO, CDFA, INC. provides financial planning service. Clients purchasing this service will receive a written report, providing the client with a detailed financial audit and plan designed to achieve his or her stated goals and objectives. In general, the financial plan will address the following areas of concern:

Personal Record Aggregation: Family records, budgeting, personal liability, estate information, and financial goals.

Tax & Cash Flow: Income tax and spending analysis and planning for current and future years.

Risk Management: Cash needs at death, income needs of surviving dependents, estate planning, and disability income analysis.

Retirement: Analysis of current strategies and investment plans to help client achieve retirement goals.

Investments: Analysis of investment alternatives and their effect on a client's portfolio and progress towards financial goals.

NICHOLAS VENTIMIGLIO, CDFA, INC. gathers required information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals, and attitudes towards risk. Related documents supplied by the client are carefully reviewed, including a questionnaire completed by the client, and a written report is prepared. Should a client choose to implement the recommendations contained in the plan, NICHOLAS VENTIMIGLIO, CDFA, INC. suggests that the client work closely with her/her attorney, accountant, insurance, agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion. These recommendations are not limited to any specific product or service offered by a broker/dealer or insurance company.

Following the completion of the financial plan, NICHOLAS VENTIMIGLIO, CDFA, INC. may provide continued analysis and consultation to consider the changing circumstances of the client's financial situation.



DIVORCE PLANNING:

As a Certified Divorce Financial Analyst, NICHOLAS VENTIMIGLIO, CDFA, INC. provides financial planning services specific to the scenarios involved in divorce. Clients purchasing this service will receive a written report, providing the client with a detailed financial audit and plan designed to achieve his or her stated goals and objectives. In general, a divorce plan will address similar areas of concern as would be addressed in a comprehensive financial plan. However, there are two very distinct goals to the divorce planning process which are typically not part of the traditional planning process:

- 1.) Help the client determine the short & long term financial impact of any proposed divorce related settlement.
- 2.) Provide valuable information on financial issues that are related to the divorce, including but not limited to tax consequences, dividing pension plans, continued health care coverage, and stock option elections.

Item 5 – Fees and Compensation

PORTFOLIO MANAGEMENT THROUGH SEI ASSET MANAGEMENT PROGRAM:

The annual fee for this Program will be charged as a percentage of assets under management, according to the schedule below:

\$0-\$499,999	1.25%
\$500,000-\$999,999	1.00%
\$1,000,000-\$2,499,999	0.75%
\$2,500,000-\$4,999,999	0.50%
Over \$5,000,000	0.25%

The clients will be invoiced in arrears at the end of each calendar quarter based upon the quarter end values (market value or fair market value in the absence of market value, plus any credit balance or minus any debit balance) of the client's combined accounts during the previous quarter. Invoice will state fee due, value on which the fee is based, and how the fee was calculated. This invoice will appear on their account statement for that quarter. Clients are responsible for verifying fee computations, since custodians are not typically asked to perform this task. The specific manner



in which fees are charged by [Nicholas Ventimiglio, CDFA, Inc.](#) is established in a client's written agreement with [Nicholas Ventimiglio, CDFA, Inc.](#) [Nicholas Ventimiglio, CDFA, Inc.](#) will generally bill its fees on a quarterly basis in arrears. Clients may also elect to be billed directly for fees or to authorize Nicholas Ventimiglio, CDFA, Inc. to directly debit fees from client accounts. Management fees may be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

FINANCIAL PLANNING & DIVORCE PLANNING FEES:

Planning fees are charged as a fee based on an estimate of the number of hours needed to complete the plan and to meet with the client. The hourly fee used to compute the fee will be \$200 per hour. NICHOLAS VENTIMIGLIO, CDFA, INC. requires a minimum of \$600 (3 hours) for any financial plan, topical or comprehensive. The length of time it will take to provide a financial plan will depend on each client's personal situation. All fees are agreed upon prior to entering into a contract. A 50% retainer will be requested upon completion of NICHOLAS VENTIMIGLIO, CDFA, INC.'s fact-finding session with the client. The remainder of the fee is due and payable upon completion of the plan.

It should be noted, the client is under no obligation to act upon this registrant's or associated person's recommendation; if the client elects to act on any of the recommendations, the client is under no obligation to effect transaction through the registrant, or associated person when person is an agent with a licensed broker/dealer or through any associate or affiliate of such person.

[Nicholas Ventimiglio, CDFA, Inc.](#)'s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a prospectus. Such charges, fees and commissions are exclusive of and in addition to [Nicholas Ventimiglio, CDFA, Inc.](#)'s fee, and [Nicholas Ventimiglio, CDFA, Inc.](#) shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that [Nicholas Ventimiglio, CDFA, Inc.](#) considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).



TERMINATION AGREEMENT & REFUND POLICY

After signing the planning agreement and submitting the first half of the fee, the client has 5 business days to sever the relationship and request a full refund. Following this 5 day period, any severance of the relationship will result in a prorated fee to the client based upon the amount of hours the advisor has already contributed to the planning. A minimum fee of \$600 or three hours will not be refunded to the client after the 5 day refund period.

All fees are subject to negotiation.

For California Residents: Subsection (j) of Rule 260.238, California Code of Regulations requires that all investment advisers disclose to their advisory clients that lower fees for comparable services may be available from other sources.

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

Nicholas Ventimiglio, CDFA, Inc. does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Nicholas Ventimiglio, CDFA, Inc. provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, Taft-Hartley plans, charitable institutions, foundations, and endowments.

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

As mentioned above, based on client's long-term investment strategy, NICHOLAS VENTIMIGLIO, CDFA, INC. will recommend the initial model asset allocation to be used. NICHOLAS VENTIMIGLIO, CDFA, INC. will, if appropriate, suggest modifications to the allocation to more adequately address the client's individual needs as well as place reasonable restrictions on the allocation among various asset classes.



Once the client's model asset allocation has been established and approved by the client, NICHOLAS VENTIMIGLIO, CDFA, INC. will implement the model using institutional, no-load mutual funds, low cost exchange traded funds, and/or separately managed accounts advised by SEI. SEI utilizes institutional money managers only. These managers are monitored by SEI daily, monthly, quarterly, and annually to ensure that their investment styles, organizational structures, and performance remain consistent with the objectives of the investment vehicle. The client may place reasonable restrictions on the nature of the funds and/or exchange traded funds and/or managers held and/or used in model. NICHOLAS VENTIMIGLIO, CDFA, INC. will assist the client in understanding and evaluating the potential impact of these restrictions on the Portfolio.

Model portfolios will be monitored quarterly and when appropriate, SEI will recommend to NICHOLAS VENTIMIGLIO, CDFA, INC. a reallocation on the portfolio based on changing economic conditions. Unless instructed otherwise, SEI will automatically reallocate portfolios and managers at the end of each quarter or when appropriate based on their recommendation. Unless instructed otherwise, SEI will automatically rebalance the client's account if the allocation among the underlying the positions deviate from the prescribed quarterly allocation by greater than a 2% variance. For the tax-managed portfolio models, the variance is 3%. Rebalancing occurs monthly with no transaction fees. Should the client's individual goals and objectives change, the client should notify NICHOLAS VENTIMIGLIO, CDFA, INC. , who will assist the client in revising their current long-term investment strategy, hence potentially making changes to their model asset allocation.

Investing in securities involves risk of loss that clients should be prepared to bear.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Nicholas Ventimiglio, CDFA, Inc. or the integrity of Nicholas Ventimiglio, CDFA, Inc.'s management. Nicholas Ventimiglio, CDFA, Inc. has no information applicable to this Item.



Item 10 – Other Financial Industry Activities and Affiliations

OTHER BUSINESS ACTIVIES

If the client requests our assistance in implementing recommendations, the client may execute brokerage transactions through an associated person of NICHOLAS VENTIMIGLIO, CDFA, INC. . In the associated person's separate capacities as a registered representative of a broker/dealer or as an agent of an insurance company, commissions earned are separate and distinct from fees charged for advisory services. NICHOLAS VENTIMIGLIO, CDFA, INC. is a California registered investment adviser. However, Nicholas Ventimiglio, and other associated persons are separately licensed as a registered representative and investment advisor representative of Fortune Financial Services, Inc. ("Fortune"), a FINRA registered broker/dealer. The president of NICHOLAS VENTIMIGLIO, CDFA, INC. , Nicholas Ventimiglio, and other associated person are also independent insurance agents for various insurance companies. In these separate capacities, Nicholas Ventimiglio and other associated person will be able to effect securities transactions and broker insurance products for advisory and non-advisory clients in the course of assisting NICHOLAS VENTIMIGLIO, CDFA, INC. clients implement their financial plan. The choice for these clients to use Mr. Ventimiglio and other associated person in this capacity is at the sole discretion of the clients. Clients are in no way obligated to use Nicholas Ventimiglio and other associated person to execute these transactions. As stated above, Nicholas Ventimiglio and other associated person may receive separate, yet customary compensation for effecting any transactions.

OTHER FINANCIAL INDUSTRY ACTIVITIES OR AFFILIATIONS BROKER/DEALER

If the client requests assistance in implementing recommendations and the client account does not meet NICHOLAS VENTIMIGLIO, CDFA, INC. 's Investment Supervisory Services minimum account size and/or account type (i.e. Variable Annuity, RETI's, 529 plans and Coverdell Education Savings accounts), the client may execute brokerage transactions through associated person of NICHOLAS VENTIMIGLIO, CDFA, INC. In the associated person's separate capacities as registered representative of a broker/dealer, commissions earned are separate and distinct from fees charged for advisory services. Currently, associated persons of NICHOLAS VENTIMIGLIO, CDFA, INC. are separately registered solely as a registered representative of Fortune Financial Services, Inc. ("Fortune"), a FINRA registered broker/dealer. Fortune is required to supervise the securities trading activities of its representatives. Clients may request that the brokerage transactions be directed to a particular broker/dealer. However, if Fortune believes that the use of that broker/dealer would hinder Fortune in meeting its supervisory obligations, associated person of NICHOLAS VENTIMIGLIO, CDFA, INC. will not be able to accept the account. In directing the use of a particular broker/dealer, it should be understood that Fortune will not have authority to negotiate commissions, or obtain volume discounts, and best execution may not be achieved. In addition, a



disparity in commission charges may exist between the commissions charged to other clients. Commissions are stated by the product vendor and are not negotiable.

OTHER INVESTMENT ADVISORY OR DISCLOSABLE RELATIONSHIPS

NICHOLAS VENTIMIGLIO, CDFA, INC. is currently using Registered Investment Advisor ("RIA") services of SEI Investments for SEI Asset Management Program

INSURANCE COMPANY OR AGENCY Nicholas Ventimiglio and associated person of NICHOLAS VENTIMIGLIO, CDFA, INC. are California licensed insurance producers qualified as Life Agents. Nicholas Ventimiglio's CA license number is 0D81254.

Associated persons of NICHOLAS VENTIMIGLIO, CDFA, INC. , in accordance with NICHOLAS VENTIMIGLIO, CDFA, INC. 's due diligence policy, are agents and in contract with various insurance companies and general agents/brokers with A or better insurance ratings from the industry's top rating organizations (i.e. AM Best, Moody, and Fitch) to provide best possible products for clients.

All material conflicts of interest under CCR Section 260.238(k) have been disclosed regarding the investment adviser, it's representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Item 11 - Code of Ethics

Nicholas Ventimiglio, CDFA, Inc. has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Nicholas Ventimiglio, CDFA, Inc. must acknowledge the terms of the Code of Ethics annually, or as amended.

Nicholas Ventimiglio, CDFA, Inc. anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Nicholas Ventimiglio, CDFA, Inc. has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Nicholas Ventimiglio, CDFA, Inc., its affiliates and/or clients, directly or indirectly, have a position of interest. Nicholas Ventimiglio, CDFA, Inc.'s employees and persons associated with Nicholas Ventimiglio, CDFA, Inc. are required to follow Nicholas Ventimiglio, CDFA, Inc.'s Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Nicholas Ventimiglio, CDFA, Inc. and its



affiliates may trade for their own accounts in securities which are recommended to and/or purchased for [Nicholas Ventimiglio, CDFA, Inc.](#)'s clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of [Nicholas Ventimiglio, CDFA, Inc.](#) will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of [Nicholas Ventimiglio, CDFA, Inc.](#)'s clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between [Nicholas Ventimiglio, CDFA, Inc.](#) and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with [Nicholas Ventimiglio, CDFA, Inc.](#)'s obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. [Nicholas Ventimiglio, CDFA, Inc.](#) will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

[Nicholas Ventimiglio, CDFA, Inc.](#)'s clients or prospective clients may request a copy of the firm's Code of Ethics by contacting [Nicholas Ventimiglio](#).

It is [Nicholas Ventimiglio, CDFA, Inc.](#)'s policy that the firm will not affect any principal or agency cross securities transactions for client accounts. [Nicholas Ventimiglio, CDFA, Inc.](#) will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.



Item 12 – Brokerage Practices

If the client requests our assistance in implementing recommendations, the client may execute brokerage transactions through associated person of NICHOLAS VENTIMIGLIO, CDFA, INC. . In the associated person's separate capacities as a registered representative of a broker/dealer or as an agent of an insurance company, commissions earned are separate and distinct from fees charged for advisory services. NICHOLAS VENTIMIGLIO, CDFA, INC. is a California registered investment adviser. However, Nicholas Ventimiglio, and other associated persons are separately licensed as a registered representative and investment advisor representative of Fortune Financial Services, Inc. ("Fortune"), a FINRA registered broker/dealer. The president of NICHOLAS VENTIMIGLIO, CDFA, INC. , Nicholas Ventimiglio, and other associated person are also independent insurance agents for various insurance companies. In these separate capacities, Nicholas Ventimiglio and other associated person will be able to effect securities transactions and broker insurance products for advisory and non-advisory clients in the course of assisting NICHOLAS VENTIMIGLIO, CDFA, INC. clients implement their financial plan. The choice for these clients to use Mr. Ventimiglio and other associated person in this capacity is at the sole discretion of the clients. Clients are in no way obligated to use Nicholas Ventimiglio and other associated person to execute these transactions. As stated above, Nicholas Ventimiglio and other associated person may receive separate, yet customary compensation for effecting any transactions.

Soft dollar benefits are not proportionally allocated to any accounts that may generate different amounts of the soft dollar benefits.

Item 13 – Review of Accounts

While the underlying securities within Nicholas Ventimiglio, CDFA, Inc.'s investment supervisory services are continuously monitored directly or indirectly, the client accounts are formally reviewed at least quarterly or as needed by the associated person of Nicholas Ventimiglio, CDFA, Inc. assigned to the client. More frequent reviews may be triggered by material changes in variables such as a client's individual circumstances, or the market, political, and/or economic environment. Financial plans will be reviewed on a client's request or at least annually.

Investment supervisory service clients will receive quarterly account statements from their custodian outlining their portfolio. Nicholas Ventimiglio, CDFA, Inc. will provide quarterly performance reports as well as tax summary reports associated with their accounts. Nicholas Ventimiglio, CDFA, Inc. may also provide consolidated account statements outlining all accounts held with the custodian. Clients may request to have account statements sent to them monthly.



Item 14 – Client Referrals and Other Compensation

DISCLOSURE OF SOLICITOR RELATIONSHIPS AND AGREEMENTS:

NICHOLAS VENTIMIGLIO, CDFA, INC. reserves the right to use Solicitors to market the firm and create client relationships. As such, any Solicitor shall qualify to receive from NICHOLAS VENTIMIGLIO, CDFA, INC. an ongoing referral fee up to 125 bps or fifty percent (50%) of NICHOLAS VENTIMIGLIO, CDFA, INC. investment advisory fee which is charged for investment management related services.

Solicitor's receipt of the referral fee from Adviser shall be paid solely from Adviser's standard investment advisory fee, and shall not result in any additional charge to the client (i.e., if you were to engage the services of NICHOLAS VENTIMIGLIO, CDFA, INC. independent of Solicitor's introduction). The Solicitor's role is limited exclusively to that of a solicitor and that Solicitor does not give, and has not given, investment-related advice on behalf of Adviser.

Finally, you also acknowledge and agree that at all times, the Solicitor shall be exclusively responsible for: (1) assisting client in determining the initial and ongoing suitability for the Adviser's investment portfolios; and, (2) for receiving/ascertaining client directions, notices and instructions, and forwarding them to NICHOLAS VENTIMIGLIO, CDFA, INC. , in writing. NICHOLAS VENTIMIGLIO, CDFA, INC. shall be entitled to rely upon any such direction, notice, or instruction until it has been duly advised in writing of changes therein. Adviser shall have no responsibility to the client for the failure of the Solicitor to timely receive/ascertain/forward/communicate any and all such directions, notices and instructions.

A solicitor disclosure statement describing the relationship between the solicitor and NICHOLAS VENTIMIGLIO, CDFA, INC. must be signed by the client prior to engaging in any activities or services with NICHOLAS VENTIMIGLIO, CDFA, INC.

Item 15 – Custody

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. [Nicholas Ventimiglio, CDFA, Inc.](#) urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.



Item 16 – Investment Discretion

Nicholas Ventimiglio, CDFP, Inc. usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Nicholas Ventimiglio, CDFP, Inc. observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, Nicholas Ventimiglio, CDFP, Inc.'s authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to Nicholas Ventimiglio, CDFP, Inc. in writing.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, Nicholas Ventimiglio, CDFP, Inc. does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. However, a client can request in writing that Nicholas Ventimiglio, CDFP, Inc. vote proxies on behalf of the client.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Nicholas Ventimiglio, CDFP, Inc.'s financial condition. Nicholas Ventimiglio, CDFP, Inc. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.



Item 19 – Requirements for State-Registered Advisers

EDUCATION AND BUSINESS STANDARDS

Individuals providing investment advice on NICHOLAS VENTIMIGLIO, CDFA, INC. 's behalf are required to possess, minimally, a college degree, hold all required state and SEC and/or FINRA licenses, two years of industry experience, and are expected to have, or be actively pursuing, a professional designation (i.e. CFP, CFA, CPA, CDFA, CDFP, etc.).

EDUCATION AND BUSINESS BACKGROUND:

PRINCIPAL/EXECUTIVE OFFICER:

President: Nicholas Ventimiglio

Born: 1979

Education: Graduated from California Polytechnic State University, San Luis Obispo in 2002 with a Bachelor of Science degree in Business Administration with a concentration in Finance.

BUSINESS BACKGROUND:

President, Nicholas Ventimiglio, CDFA (2009-Present)

Registered Representative, Fortune Financial Services, Inc. (2016- Present)

Registered Representative, Investment Adviser Representative, First Allied Securities (2007-2016)

Financial Planning Executive, Kim Financial Advisors (2004-2007)

Registered Representative, Financial Telesis, Inc. (2004-2007)

Registered Representative, MML Investor Services, Inc. (2002-2004)

PROFESSIONAL DESIGNATIONS:

Certified Divorce Financial Analyst (2008- Present)

Actively pursuing Certified Financial Planner Designation