

INTEREST IN CLIENT TRANSACTIONS. RA, which recommends to clients, or buys or sells for client accounts, has no material financial interest in any securities to avoid any conflict of interest. Block trades are utilized to avoid conflicts of interest in transaction when RA invests in the same securities as the client.

BROKERAGE PRACTICES. DIG selected the third party broker-dealer based on:

name recognition	ease of website navigation
competitive commission	mutual fund availability
no fee ETFs	amount of website information
back office team support	client support

DIG does not receive any research or other products or services (including soft dollar benefits) for its connection with broker-dealer. RA uses multiple free established research websites to verify information. Client referrals are not a consideration for selecting broker-dealer. Not all advisers require their clients to direct brokerage. DIG & RA are not affiliated nor have other economic relationships that create a material conflict of interest. All purchases or sales of stocks and options are aggregated for clients that have the same goals and timeframes.

REVIEW OF ACCOUNTS. Client accounts and financial plans are reviewed annually, more often subject to market conditions and are conducted by RA. Triggers include, but not limited to, security management changes, sudden market gains or losses, economic news, industry news and earnings reports and guidance. Clients will receive a written report comparing their accounts to several indices.

CLIENT REFFERALS. DIG or RA does not receive any economic benefits from a third party for providing investment advice or other advisory services. DIG or RA does not directly or indirectly compensate any person who is not a DIG supervised person for client referrals.

CUSTODY. All client accounts are held by a qualified custodian, a broker-dealer, and will receive monthly account statements and should be reviewed carefully for accuracy.