



## **Laurentide Advisory, LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: April 26, 2018**

This Disclosure Brochure provides information about the qualifications and business practices of Laurentide Advisory, LLC (“Laurentide”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (781) 749-7330.

Laurentide is a Registered Investment Adviser (RIA) located in the Commonwealth of Massachusetts. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment adviser does not imply any specific level of skill or training. The Disclosure Brochure provides information about Laurentide to assist you in determining whether to retain the Adviser.

Additional information about Laurentide and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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**Hingham, MA 02043**  
**Phone: (781) 749-7330**  
[www.LaurentideAdvisory.com](http://www.LaurentideAdvisory.com)

## **Item 2 – Material Changes**

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Laurentide Advisory believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times.

### Material Changes

Item 4B, Description of Services Offered, has been refined and clarified. Market Exposure Program has been renamed Active Investments Program.

Item 19B, Other Business Activities of Principal Officers. Mr. Kirby provides information about his activities with the Boots to Business, Revenue Readiness Program.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Laurentide.

At any time, you may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by our firm name or our firm CRD number - 269877. You may also request a copy of this Disclosure Brochure at any time, by contacting us at 781-749-7330.

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## **Item 4 – Advisory Services**

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### A. Firm Information

Laurentide Advisory, LLC (“Laurentide” or the “Adviser”) is a Registered Investment Adviser located in the Commonwealth of Massachusetts, which is organized as a Limited Liability Company (LLC) under the laws of Massachusetts. Laurentide was founded in June 2015 and is owned and operated by Robert F. Kania (Principal) and John P. Kirby (Principal and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Laurentide.

The firm provides financial planning and investment advisory services on a “Fee-Only” basis. “Fee-Only” means that we do not sell any financial products; we offer only advice and services. Our firm does not sponsor or manage a “wrap fee” investment program. We abide by a *fiduciary standard*. This means that we will act in the utmost good faith and will perform in a manner that we believe is in our clients’ best interest.

### B. Description of Services Offered

Laurentide offers investment management, financial planning, and advisory services to individuals, trusts, businesses, and institutions in Massachusetts and other states (each referred to as a “Client”).

#### Investment Management Services

Laurentide provides customized investment advisory solutions for Clients and as fiduciaries, we always put our clients’ needs first. The Laurentide Advisory team has an extensive background in institutional asset management, including experience as portfolio managers, researchers, and consultants. We operate using a transparent, fee-for-service approach. We believe that clients can realize greater returns when costs are controlled.

We place a high priority on getting to know our clients. We work with each client on a one-on-one basis and use interviews and questionnaires to understand investment objectives and risk tolerances. Through regular personal contact and interaction, we believe we are able to provide optimal investment strategies delivered through discretionary or non-discretionary investment management.

Laurentide establishes an Investment Policy Statement (IPS) for each Client. The IPS is designed to foster communication and understanding between client and adviser. The IPS states the objectives and risk orientation of the client, explains the investment strategy and lists the performance measurement benchmark. Laurentide references the IPS when implementing a Client’s investment strategy and reviews the IPS on an annual basis.

Laurentide’s investment approach is primarily long-term focused and utilizes active management. Passive products will be used when appropriate. Laurentide may buy, sell or re-allocate positions that have been held less than one year to meet Client objectives or due to market conditions. We monitor each portfolio to ensure alignment with the Client’s goals, objectives, circumstances, and risk tolerance as stated in the IPS. Clients have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolios, subject to acceptance by the Adviser.

#### **Active Investments Program**

The objective of the Active Investments Program (AIP) is to help each Client achieve long-term savings and wealth accumulation goals using a broadly diversified set of investments commensurate with the Client’s investment time horizon and comfort level with market-related risks. Through AIP, we build and manage a portfolio of mutual funds and/or exchange-traded funds to meet your needs. AIP is offered as both a discretionary and non-discretionary service. As a discretionary service, you delegate authority to us to manage investments on your behalf. When Laurentide manages client assets on a non-discretionary basis, the Advisor

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notifies the client and obtains permission prior to the sale or purchase of each security within the client's account. Clients may decide not to invest in certain securities or types of securities and may refuse to approve securities transactions.

The investment process for AIP begins by assessing the state of the capital markets and identifying global macroeconomic trends that we think will have an impact on the investment performance of key asset classes and sub-asset classes. We then forecast long-range expected returns and expected volatilities for these asset classes and sub-asset classes. We use these forecasts as a guide for structuring optimal asset class allocations.

The next step in the investment process is fund selection. We apply our extensive research capabilities and investment experience when selecting positions from a broad spectrum of mutual funds and ETFs. As an unaffiliated, independent Registered Investment Adviser we have the freedom to explore a wide variety of investment options and make conflict-free decisions on behalf of our Clients. Our fund selection process incorporates factors including but not limited to: investment style, portfolio manager tenure, parent company structure, idea generation and the expense that our Clients incur to own the fund. We expect our selected active managers to outperform their respective benchmarks and achieve their return targets given an expected range of volatility over intermediate and long-term investment periods.

Our asset allocations and best-in-class funds are used to build optimal Laurentide Portfolios which are appropriate for a range of risk profiles. We select the Laurentide Portfolio that is most closely aligned with the client's return expectations and risk tolerances. The Laurentide Portfolio can be adjusted and customized to take into account specific client needs, requirements and restrictions. The end result of the investment process employed in AIP is a customized, actively managed, risk-appropriate investment portfolio for each client.

### ***Portfolio Oversight Program***

The objective of the Portfolio Oversight Program is to help Clients who participate in Employer-Sponsored Retirement Plans—such as 401(k), 403(b), and 457 plans—make asset allocation and fund selection decisions that will have a beneficial impact on their long-term savings and wealth accumulation goals. The Portfolio Oversight Program is a non-discretionary investment service, whereby Laurentide makes recommendations and you decide to utilize and implement the recommendations.

Laurentide reviews and help you understand the investment options provided by your plan sponsor. By understanding your financial situation (including your tolerance for risk, investment objectives and goals), we are then able to recommend an appropriate asset allocation and investment portfolio to meet your needs, using the investment selections provided by your plan sponsor. If the plan permits a self-directed brokerage account, we will work with you to consider this approach and other investment options that may be available to you.

### ***Targeted Strategies Program***

The objective of the Targeted Strategies Program (TSP) is to meet a Client need or set of needs through a specific portfolio solution. Through TSP, we may build and manage a portfolio of individual equities and/or fixed income securities. We may also recommend an existing Laurentide investment strategy that is designed to meet a certain objective. TSP is offered as both a discretionary and non-discretionary service. As a discretionary service, you delegate authority to us to manage investments on your behalf. When Laurentide manages client assets on a non-discretionary basis, the Advisor notifies the client and obtains permission prior to the sale or purchase of each security within the client's account. Clients may decide not to invest in certain securities or types of securities and may refuse to approve securities transactions.

We offer equity portfolios that can invest in publicly traded stocks. The factors we assess when considering equity security selection include price-to-earnings multiples, price-to-book multiples, dividend yield, and dividend growth, and other measures of equity valuations.

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We also offer Fixed Income portfolios that can invest in taxable or tax-exempt securities. We take an active approach to managing fixed income portfolios and focus on the interest rate (duration) risk and credit risk. Fixed income portfolios can invest in a full range of taxable and tax-exempt securities and will be limited to investment-grade credit quality securities (BBB- or higher credit ratings). Consideration will be given to after-tax yield, liquidity, the absolute level of yield and credit risk premium when constructing fixed income portfolios.

We require a minimum of \$50,000 to establish an individual equity securities account and \$100,000 for an individual fixed income securities account. We reserve the right to accept smaller accounts on a case-by-case basis.

### Financial Planning Services

We provide a variety of financial planning services to individuals and families. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation. Financial planning provides the framework for clarifying aspirations, voicing and expressing concerns, and establishing near, medium and long-term goals. The service is designed to offer a comprehensive Financial Plan.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Adviser and the interests of the Client. For example, a recommendation to engage the Adviser for investment management services or to increase the level of investment assets with the Adviser may pose a conflict, as it would increase the advisory fees paid to the Adviser. Clients are not obligated to implement any recommendations made by the Adviser or maintain an ongoing relationship with the Adviser. If the Client elects to act on any of the recommendations made by the Adviser, the Client is under no obligation to implement the transaction through the Adviser.

### C. Client Account Management

Prior to engaging Laurentide Advisory to provide investment advisory services, each client will be required to enter an Investment Management Agreement or Advisory Services Agreement that defines the terms, conditions, authority, and responsibilities of the Adviser and the Client. Additionally, an Investment Policy Statement may be developed that summarizes your investment goals and objectives along with the broad strategy or strategies to be employed to meet your objectives.

### D. Wrap Fee Programs

Laurentide does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Laurentide Advisory.

### E. Assets Under Management

Laurentide Advisory was founded July 2015. As of February 28, 2018, we managed \$11,338,605 client assets on a discretionary basis. Clients may contact us at any time to request more current information.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by Laurentide Advisory.

### A. Fees for Advisory Services

#### Investment Management Services

#### **Active Investments Program and Targeted Strategies Programs**

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Investment advisory fees are paid quarterly in arrears, at the end of each calendar quarter, pursuant to the terms of the Investment Management Agreement. Laurentide's management fee is based upon the market value of the account at the end of the calendar quarter. In instances where Laurentide manages more than one account for an individual or household (nuclear family), the management fee is based upon the sum of market values of all the accounts. Fees may be negotiable at the sole discretion of the Adviser. All securities held in accounts managed by Laurentide will be independently valued by the designated Custodian. Laurentide will not have the authority or responsibility to value portfolio securities.

Investment advisory fees are based on the following schedule:

<b>Assets Under Management</b>	<b>Annual Rate</b>
First \$500,000	0.75%
Next \$500,000	0.55%
Over \$1,000,000	0.35%

### **Portfolio Oversight Program**

Laurentide offers the non-discretionary Portfolio Oversight Program for a fixed fee per engagement ranging from \$250 to \$500. Fees may be negotiable depending on the nature and complexity of each Client's circumstances. Fees will be determined prior to establishing the advisory relationship and written in the Advisory Services Agreement. The contract is written as an annually renewable agreement where the client will be given the opportunity to opt out of renewal before the anniversary date.

### Financial Planning Services

Laurentide offers financial planning at an hourly rate of \$250 per hour or for a fixed fee per engagement ranging from \$500 to \$1,500. Fixed fee engagements are offered based on the expected effort and duration at the Adviser's hourly rate. Fees may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate of total hours or fees will be determined prior to establishing the Advisory Services Agreement. The fee is waived for clients with \$150,000 or more in assets managed under a Laurentide Investment Management Agreement.

Our fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, we shall not receive any portion of these commissions, fees, and costs.

### B. Payment of Fees

#### Active Investments Program and Targeted Strategies Program

We charge fees at the end of the calendar quarter. We calculate the fees and provide you with a report itemizing the fee, the calculation period covered by the fee, the account value and the methodology used to calculate the fee. The management fee may be automatically deducted from your account[s] by the Custodian if you wish. If you do not select this option, we will bill you directly for the management fee.

#### Portfolio Oversight Program

We charge fifty percent (50%) of the Portfolio Oversight Program fee upon all parties signing the Advisory Services Agreement. We will bill you directly for the first 50% and for the remainder upon delivery of our review and recommendations.

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### Financial Planning Services

Financial planning fees are invoiced up to fifty percent (50%) upon execution of the Advisory Services Agreement and the remainder upon completion of the engagement deliverable[s].

### C. Other Fees and Expenses

You may incur fees or charges imposed by third parties in connection with investments made on your behalf. This includes all custodial and securities execution fees charged by the custodian and executing broker-dealer, as well as expenses charged by mutual funds and exchange-traded funds to their shareholders. These fees and expenses are described in each fund's prospectus. Fees will also exist in your qualified retirement accounts and annuities and their sub-accounts. Accordingly, you should review both the fees charged by the counterparties and the fees charged by Laurentide to fully understand the total fees to be paid. Laurentide Advisory does not share in fees charged by others and acts as a fiduciary in conducting business on your behalf.

### D. Advance Payment of Fees and Termination

#### Investment Management Services

Laurentide Advisory is compensated for its services in arrears. Either party may request to terminate the investment advisory agreement with Laurentide Advisory, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

#### Financial Planning Services and Portfolio Oversight Program

The Advisor may require a partial advance payment for Financial Planning or Portfolio Oversight engagements. Either party may terminate the agreement, at any time, by providing written a notice to the other party. The Client may also terminate the agreement within five (5) business days of signing the Advisor's financial planning or consulting agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client will be responsible for fees earned based on the hours incurred or the percentage completion of the engagement. Any unearned, prepaid fees will be promptly refunded to the Client. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

### E. Compensation for Sales of Securities

Laurentide does not receive compensation for securities transactions in any Client account. We are advisers and are not registered as broker-dealers. We govern all securities transactions in our role as fiduciaries.

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

Laurentide does not charge performance-based fees for its investment management services. Laurentide does not manage any proprietary investment funds or limited partnerships and has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7 – Types of Clients**

We provide investment advisory services to individuals, high net worth individuals, trusts, estates, businesses, and institutions. We generally do not impose a minimum for establishing a relationship.

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

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## Methods of Analysis

Laurentide uses the following primary methods of analysis and does not restrict itself to these methods of analysis. No single method is used as the sole decision-making factor as we formulate optimal asset allocations; select mutual funds, ETFs, and individual securities; and build and adjust portfolios to meet Client needs.

### *Economic*

The use of economic data, including but not limited to Gross Domestic Product statistics, inflation statistics, employment statistics, and consumer and business spending statistics, allows Laurentide to understand broad macroeconomic trends that may have an influence on the effectiveness of certain investment strategies and the performance of funds and securities used in Client portfolios.

### *Fundamental*

The analysis of fundamental information, including but not limited to financial statements, public records, and corporate disclosures, gives Laurentide perspective on the on-going operations of the companies that issue securities purchased for Client portfolios and how the company and sector developments may affect the value of these securities.

### *Technical & Market*

Technical and market analysis involves the analysis of statistics generated by market activity, such as past prices and volume. Technical analysis may involve the use of charts to identify patterns and trends which may be based on investor sentiment rather than the fundamentals of a particular company.

## Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Laurentide will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. While this type of analysis helps us evaluate a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in fundamental analysis may lose value and may have negative investment performance. We monitor these economic indicators to determine if adjustments to strategic allocations are appropriate. More details about our review process are included below in "Item 13 – Review of Accounts".

Each Client engagement will entail a review of investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing the account. Client participation in this process, including full and accurate disclosure of requested information, is essential. It is your responsibility to inform us of any changes in financial condition, goals or other factors that may affect the analysis.

All of our investment strategies have risk. That risk may include the risk of loss of principal, the risk of declining income yield or the risk of failing to meet a long-term goal. The following list is not inclusive and is meant to highlight some of the risk associated with investing in our strategies, which are typically implemented through one of our three main programs: the Active Investments Program, the Portfolio Oversight Program and the Targeted Strategies Program.

- **Active Management Risk** is the risk that a portfolio designed to outperform the return of a stated benchmark will fall short of that goal. Active management risk can be found in several forms in our programs. We may take tactical positions versus a benchmark. Selecting a mutual fund or specific securities for a portfolio represents an active decision. Also, the managers of the mutual funds we select may take active risk positions in their funds. In individual securities portfolios, we make active decisions that will result in the risk profile of the portfolio deviating from a stated benchmark.
- **Concentration Risk** is the risk from a large weight to a security or sector. We seek to provide security and sector level diversification; however, your portfolio may have a greater concentration in a particular security or sector than that which is found in a standard benchmark. Within individual securities strategies, we seek to invest in a number of securities so as to generate diversified exposures with certain risk characteristics. Individual securities strategies may have a higher level of security or sector risk than other portfolios that we manage.
- **Credit Risk** is the risk of a company being unable to meet its obligations. This risk is assessed by the nationally recognized statistical rating organizations (including Moody's and Standard & Poor's) and reflected in the credit risk premiums of corporate bonds.
- **Currency Risk** is the risk that our portfolios will have exposure to non-dollar securities and the underlying currency will underperform the US dollar. Foreign currency risk can add to, or subtract from, overall risk.
- **Derivatives Risk** encompasses several risks, including market risk, counterparty risk, and interconnection risk. We do not invest directly in derivatives. Funds selected for our clients may decide to use derivatives in their portfolios. Individual securities portfolios constructed by Laurentide only invest in cash bonds and stocks.
- **Equity Market Risk** is the risk that stock markets will fluctuate in price and may generate negative rather than positive total returns. Our strategies target a level of risk relative to the broad equity market. Equity market risk is diversified by introducing numerous management styles and volatility characteristics.
- **Inflation Risk** is the risk that purchasing power fails to increase the rate of appreciation for goods or services. This risk can be mitigated by using growth assets or by investing in securities that may increase in value as inflation increases.
- **Interest Rate Risk** is the risk inherent in a fixed income security to changes in the level of interest rates. As interest rates go up bond prices will move lower, and vice-versa. Longer maturity securities are more sensitive to this dynamic. We attempt to manage portfolio interest rate risk through our fund selection and weightings. Individual securities portfolios, when fixed income securities are owned, will be exposed to interest rate risk.
- **Liquidity Risk** is the risk that an investor may not be able to efficiently exchange portfolio holdings for cash on an as-needed basis.
- **Sovereign Risk** is the risk that portfolio returns will be impacted by the actions of governments. The mutual funds and individual securities we invest in may have exposure to government bonds or non-US companies that could be affected by sovereign risk.

We work with each Client to determine their tolerance for risk as part of the portfolio construction process. **Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with their Adviser.**

## **Item 9 – Disciplinary Information**

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There are no legal, regulatory or disciplinary events involving Laurentide or any of its employees. Laurentide and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any adviser or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

To review the firm information contained in Form ADV Part 1, select the option for “Investment Adviser Search”, then selecting “Firm” and enter **269877** in the field labeled “Firm Name or CRD# or SEC#”. This will provide access to Form ADV Parts 1 and 2. Item 11 of the Form ADV Part 1 lists legal and disciplinary disclosure questions.

In addition, Clients may also obtain information relating to the disciplinary history of any investment adviser representative conducting business in Massachusetts by contacting the Commonwealth of Massachusetts Securities Division at (617) 727-3548.

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

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The sole business of Laurentide is to provide investment advisory services to its Clients. Laurentide does not maintain any affiliations with other firms, other than contracted service providers to assist with the servicing of its Clients’ accounts.

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

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### A. Code of Ethics

We have implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Laurentide. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Laurentide and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Laurentide associates to adhere not only to the specific provisions of the Code but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (781) 749-7330.

As a CFA charterholder, Mr. Kania is also obligated to abide by the Code of Ethics established by the CFA Institute.

### B. Personal Trading with Material Interest

Laurentide allows its employees to purchase or sell the same securities that may be recommended to and purchased on behalf of our Clients. We do not act as principal in any transactions. In addition, we do not act as the general partner of a fund or advise an investment company. Nor do we have a material interest in any securities traded in Client accounts.

### C. Personal Trading in Same Securities as Clients

Laurentide allows its employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. The fiduciary duty of an Adviser to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by our requirement that employees report

personal securities trades for review by the employee's supervisor or the CCO. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

In addition, the Code of Ethics governs Gifts and Entertainment given by and provided to the Adviser, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

#### D. Personal Trading at Same Time as Client

While Laurentide allows its employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. At no time, will Laurentide, or any associated person of Laurentide, transact in any security to the detriment of any Client.

### **Item 12 – Brokerage Practices**

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#### A. Recommendation of Custodian[s]

Laurentide does not require clients hold custody of assets with a particular firm. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize Laurentide to direct trades to this custodian as agreed in the Investment Advisory Agreement. Further, Laurentide does not have the discretionary authority to negotiate commissions on behalf of its Clients on a trade-by-trade basis. Laurentide does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts.

If the client is in need of custodial and execution service, we can make a recommendation. Laurentide does not receive research services, other products, compensation or new business referrals as a result of recommending a particular broker.

Following are additional details regarding the brokerage practices of the Adviser:

1. *Soft Dollars* - We do not participate in soft dollar programs sponsored or offered by any broker-dealer.
2. *Brokerage Referrals* – We do not receive compensation from any third parties in connection with the recommendation for establishing a brokerage account.
3. *Directed Brokerage* - All Clients are serviced on a “directed brokerage basis”, where Laurentide, as your adviser, will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. We will not engage in any principal transactions (i.e., trade of any security from or to the Adviser’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). In selecting the custodian, Laurentide will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

#### B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Laurentide will execute its transactions through an unaffiliated broker-dealer selected by the Client. Laurentide may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

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## **Item 13 – Review of Accounts**

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### A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Laurentide Advisory. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

### B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Laurentide Advisory if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by the material market, economic or political events.

### C. Review Reports

Clients utilizing the Active Investments Program or the Targeted Strategies Program will receive written quarterly appraisals from Laurentide Advisory that include account holdings, the market value, account performance, and comparable performance of market indices. The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions, and fees relating to the Client's accounts.

Clients utilizing the Portfolio Oversight Program typically receive a written review and recommendation at the initial engagement of the contract and then again at the anniversary date of a contract for service. Portfolio Oversight Program clients also receive a quarterly letter from Laurentide. Custody reports detailing client assets and all account activity will be delivered by the Client's custodian.

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

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### A. Compensation Received by Laurentide

As an independent Registered Investment Adviser, Laurentide is compensated solely by our Clients. We do not receive commissions or other compensation from product sponsors, broker-dealers or any unrelated third party. Laurentide may refer Clients to various third parties to provide certain services necessary to meet the goals of its Clients. Likewise, Laurentide may receive referrals of new Clients from a third-party.

### B. Client Referrals from Solicitors

We do not engage paid solicitors for Client referrals. We attempt to raise awareness of our company, build trust, develop new client relationships, and deepen existing client relationships by communicating the benefits and features of our firm.

## **Item 15 – Custody**

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Laurentide does not accept or maintain custody of any Client accounts, except for the authorized deduction of our fees. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct Laurentide to utilize that custodian for the Client's security transactions. We encourage you to review statements provided by the account custodian. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices".

## **Item 16 – Investment Discretion**

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We generally have discretion over the selection and amount of securities bought or sold in Client accounts without obtaining prior consent or approval from our Clients. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by our Clients and agreed to by Laurentide. The discretionary authority will only be authorized upon full disclosure to our Clients. The granting of such authority will be evidenced by the execution of an Investment Management Agreement containing all applicable limitations to such authority. All discretionary trades made by Laurentide will be in accordance with each Client's investment objectives and goals.

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

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Laurentide does not accept proxy-voting responsibility for any Client. You will receive proxy statements directly from the Custodian. We will assist in answering questions relating to proxies, however, our Clients retain the sole responsibility for proxy decisions and voting.

### **Item 18 – Financial Information**

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Neither Laurentide nor its management, have any adverse financial situations that would reasonably impair the ability of Laurentide to meet all obligations to its Clients. Neither Laurentide nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Laurentide is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$500 or more for services to be performed six months or more in advance.

### **Item 19 – Requirements for State Registered Advisors**

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#### A. Educational Background and Business Experience of Principal Officers

The Principals of Laurentide are Robert F. Kania and John P. Kirby. Information regarding their formal education and background are in Item 2 of their respective Form Part 2B – Brochure Supplements below.

#### B. Other Business Activities of Principal Officers

In addition to the investment advisory activities of Laurentide clients. Mr. Kirby is an instructor for the Boots to Business Revenue Readiness (B2B RR) program, teaching online evening classes. This commitment occupies less than 5% of his working hours.

The B2B RR program personally assists a transitioning veteran and/or spouse in defining and refining their business model to more easily develop a business plan. As an instructor/counselor, Mr. Kirby conducts online training and support to the transitioning veteran and/or spouse interested in starting a business. B2B RR is a six (6) week interactive “live” virtual classroom led by experienced veteran entrepreneurs.

The Boots to Business Revenue Readiness program is funded by the Small Business Administration (SBA) Office of Veterans Business Development (OVBD) through a cooperative agreement with **Mississippi State University**.

Mr. Kania is dedicated to the investment advisory activities of Laurentide's clients. Mr. Kania does not have any other business activities.

#### C. Performance Fee Calculations

Laurentide does not charge performance-based fees for its investment advisory services. The fees charged by Laurentide are as described in “Item 5 – Fees and Compensation” above and are not based upon the capital appreciation of the funds or securities held by any Client.

#### D. Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Laurentide or its Principals.*** Neither Laurentide nor its Principals have ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Laurentide or its Principals.

Securities laws require an adviser to disclose any instances where the adviser or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Laurentide or its Principals.***

E. Material Relationships with Issuers of Securities

Neither Laurentide nor its Principals have any relationships or arrangements with issuers of securities.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Robert F. Kania, CFA  
Principal**

**Effective: April 26, 2018**

This Brochure Supplement provides information about the background and qualifications of Robert F. Kania, CFA (CRD# **2111120**) in addition to the information contained in the Laurentide Advisory, LLC (“Laurentide” or the “Advisor”) (CRD # 269877) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Laurentide Disclosure Brochure or this Brochure Supplement, please contact us at (781) 749-7330.

Additional information about Mr. Kania is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by name or Mr. Kania’s CRD# 2111120.

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## Item 2 – Educational Background and Business Experience

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Robert F. Kania, born in 1968, is dedicated to advising Clients in his role as a Principal of Laurentide. Mr. Kania earned a Bachelor of Arts in History from the College of Holy Cross in 1990 and is a CFA charter holder. Additional information regarding Mr. Kania's employment history is included below.

### Employment History:

Principal, Laurentide Advisory, LLC	06/2015 to Present
Principal, Serapis Capital, LLC	01/2015 to 12/2017
Senior Portfolio Manager, State Street Global Advisors	10/2000 to 08/2012
Analyst, Fleet Investment Advisors	05/1998 to 10/2000

### Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Kania.*** Mr. Kania has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Kania.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Kania.***

However, we do encourage you to independently view the background of Mr. Kania on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter **2111120** in the field labeled "Individual Name or CRD#".

## Item 4 – Other Business Activities

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Mr. Kania is dedicated to the investment advisory activities of Laurentide's Clients. Mr. Kania does not have any other business activities.

## Item 5 – Additional Compensation

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Mr. Kania is dedicated to the investment advisory activities of Laurentide's Clients. Mr. Kania does not receive any additional forms of compensation.

## Item 6 – Supervision

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Mr. Kania serves as a Principal of Laurentide. As an owner of the firm, Mr. Kania does not have a supervisor. Mr. Kania can be reached at (781) 749-7329.

Laurentide has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Laurentide. Further, Laurentide is subject to regulatory oversight by various agencies. These agencies require registration by Laurentide and its employees. As a registered entity, Laurentide is subject to examinations by regulators, which may be announced or unannounced. Laurentide is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Adviser.

### **Item 7 – Requirements for State Registered Advisors**

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Mr. Kania does not have any additional information to disclose.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**John P. Kirby  
Principal and Chief Compliance Officer**

**Effective: April 26, 2018**

This Brochure Supplement provides information about the background and qualifications of John P. Kirby (CRD# **1200530**) in addition to the information contained in the Laurentide Advisory, LLC (“Laurentide” or the “Advisor”) (CRD # 269877) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Laurentide Disclosure Brochure or this Brochure Supplement, please contact us at (781) 749-7330.

Additional information about Mr. Kirby is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by name or Mr. Kirby’s CRD# 1200530.

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## Item 2 – Educational Background and Business Experience

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John Kirby, born in 1956, is dedicated to advising Clients in his role as a Principal and the Chief Compliance Officer of Laurentide. Mr. Kirby earned a Masters in Business Administration from Suffolk University in 2010 and a Bachelor of Arts from Boston College in 1983. Additional information regarding Mr. Kirby's employment history is included below.

### Employment History:

Principal and Chief Compliance Officer, Laurentide Advisory, LLC	06/2015 to Present
Portfolio Manager, Mercer Consulting Investment Management	05/2014 to 05/2015
Managing Director/Portfolio Manager, State Street Global Advisors	02/1995 to 01/2012
Investment Officer, Lowell Blake & Associates	01/1990 to 02/1995

## Item 3 – Disciplinary Information

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**There are no legal, civil or disciplinary events to disclose regarding Mr. Kirby.** Mr. Kirby has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Kirby.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. **As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Kirby.**

However, we do encourage you to independently view the background of Mr. Kirby on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter **1200530** in the field labeled "Individual Name or CRD#".

## Item 4 – Other Business Activities

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In addition to the investment advisory activities of Laurentide clients. Mr. Kirby is an instructor for the Boots to Business Revenue Readiness (B2B RR) program, teaching online evening classes. This commitment occupies less than 5% of his working hours.

The B2B RR program personally assists a transitioning veteran and/or spouse in defining and refining their business model to more easily develop a business plan. As an instructor/counselor, Mr. Kirby conducts online training and support to the transitioning veteran and/or spouse interested in starting a business. B2B RR is a six (6) week interactive "live" virtual classroom led by experienced veteran entrepreneurs.

The Boots to Business Revenue Readiness program is funded by the Small Business Administration (SBA) Office of Veterans Business Development (OVBD) through a cooperative agreement with **Mississippi State University**.

## Item 5 – Additional Compensation

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Mr. Kirby is dedicated to the investment advisory activities of Laurentide's Clients. Mr. Kirby does not receive any additional forms of compensation.

## Item 6 – Supervision

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Mr. Kirby serves as a Principal and the Chief Compliance Officer of Laurentide. As an owner of the firm, Mr. Kirby does not have a supervisor. Mr. Kirby can be reached at (781) 749-7330

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Laurentide has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Laurentide. Further, Laurentide is subject to regulatory oversight by various agencies. These agencies require registration by Laurentide and its employees. As a registered entity, Laurentide is subject to examinations by regulators, which may be announced or unannounced. Laurentide is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

#### **Item 7 – Requirements for State Registered Advisors**

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Mr. Kirby does not have any additional information to disclose.

# Laurentide Advisory, LLC

## Privacy Policy

**Effective Date: March 30, 2018**

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## Privacy Policy

### Our Commitment to You

Laurentide Advisory, LLC (“Laurentide” or the “Adviser”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Adviser, as described herein our Privacy Policy (“Policy”).

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Laurentide (also referred to as “we”, “our” and “us”) protects the security and confidentiality of the personal information we have and control to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Laurentide does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisers (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage, and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage, and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client’s personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

## How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> Laurentide does not disclose and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Laurentide or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> Laurentide does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

## State-specific Regulations

Massachusetts	In response to a Massachusetts law, clients must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.
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## Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

## Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (781) 749-7330.

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