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## **FORM ADV Part 2A: Firm Brochure**

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### **PRIVACY POLICY STATEMENT**

This brochure provides information about the qualifications and business practices of DHJJ Financial Advisors. If you have any questions about the contents of this brochure, please contact us at 630.420.1360 or [ccorso@dhjj.com](mailto:ccorso@dhjj.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.

DHJJ Financial Advisors is an investment advisor registered with the United States Securities and Exchange Commission. Registration of an investment advisor with the SEC does not imply a certain level of skill or training.

Additional information about DHJJ Financial Advisors is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our Firm's CRD number is 107034.

## **Item 2 – Material Changes**

This Item 2 summarizes all material changes made to this Brochure since DHJJ Financial Advisors' (the "Firm") most recent annual updating amendment filing, dated February 14, 2025. There has been one material change to the Firm's Brochure since the Firm's most recent annual amendment filing:

- Item 5 has been updated to reflect that the Firm's hourly financial planning fees range from \$150 to \$495 per hour, depending on the complexity of the financial plan or the experience level of the advisor providing the advice.

### **Requesting a New Brochure:**

We will provide you with a new Brochure as necessary based on changes or new information, at any time, without charge. Currently, our Brochure is available on our website or may be requested by contacting Camilla C. Corso, our Chief Compliance Officer at [ccorso@dhjj.com](mailto:ccorso@dhjj.com). Our Brochure is also available on our website, [www.dhjjfinancial.com](http://www.dhjjfinancial.com), also free of charge.

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#### **Item 4 – Advisory Business**

DHJJ Financial Advisors is our primary business name. Our legal name is DHJJ Financial Advisors, Ltd. DHJJ Financial Advisors is an SEC-registered investment advisor with its principal place of business located in Naperville, Illinois. DHJJ Financial Advisors also conducts investment advisory business at our second location in St. Charles, Illinois. DHJJ Financial Advisors began conducting business in 1988.

No shareholders of DHJJ Financial Advisors are considered principal shareholders. (“Principal” shareholders are any individuals and/or entities controlling 25% or more of the ownership of a registered investment advisory firm).

DHJJ Financial Advisors offers the following advisory services to our clients: (i) investment advisory services/individual portfolio management; (ii) financial planning; and (iii) retirement plan services program.

#### **INVESTMENT SUPERVISORY SERVICES INDIVIDUAL PORTFOLIO MANAGEMENT**

Our Firm provides continuous advice to our clients regarding the investment of client funds based on the individual needs of each client. Through personal discussions in which goals and objectives based on a client’s particular circumstances are established, we develop a client’s personal investment policy and create and manage a portfolio based on that policy. During our data-gathering process, we determine the client’s individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client’s prior investment history, as well as family composition and background.

DHJJ Financial Advisors manages individual portfolios which are held with an authorized custodian (Charles Schwab & Co.). We manage these advisory accounts on a discretionary basis. Discretionary authorization is given to DHJJ Financial Advisors to execute trades in our clients’ Schwab accounts. Account supervision is guided by the client’s stated objectives (i.e., capital preservation, income, growth & income, growth, aggressive growth), as well as tax considerations. DHJJ Financial Advisors also manages advisory accounts on a non-discretionary basis whereby it: (i) executes trades for 401(k) accounts as instructed by the individual participants of respective 401(k) accounts; or (ii) on a consulting basis.

No-load mutual funds, exchange-listed securities, exchange-traded funds, certificates of deposit, corporate bonds, municipal bonds, U.S. Government securities, and other investment products deemed appropriate for client’s account(s) will be purchased through the facilities of Schwab Advisor Services (formerly Schwab Institutional) a division of Charles Schwab & Co., Inc. (“Schwab”). There may be transaction charges involved when purchasing or redeeming these securities. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client’s stated investment objectives, tolerance for risk, liquidity, and suitability.

#### **FINANCIAL PLANNING**

DHJJ Financial Advisors provides financial planning services. Financial planning is a comprehensive evaluation of a client’s current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information, and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service receive a written report which provides the client with a detailed financial plan designed

to assist the client in achieving his or her financial goals and objectives.

In general, the financial plan can address any or all of the following areas, as requested by the client:

- **PERSONAL:** We review family records, budgeting, personal liability, estate information and financial goals.
- **TAX & CASH FLOW:** We analyze the client's income tax and spending and planning for past, current, and future years; then illustrate the impact of various investments on the client's current and future cash flows. We may also analyze and illustrate the impact of various investments on the client's current income tax and future tax liability.
- **INVESTMENTS:** We analyze the client's current investment strategies and may recommend alternatives, if appropriate, and how they may potentially impact the client's existing portfolio. We may also present the advantages of opening an Investment Supervisory Services account that we would manage on a discretionary basis.
- **INSURANCE:** We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile insurance.
- **RETIREMENT:** We analyze the client's current strategies and investment plans to help the client achieve his or her retirement goals.
- **DEATH & DISABILITY:** We review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- **ESTATE:** We assist the client in assessing and developing long-term strategies, including as appropriate, living trusts, wills, estate taxation, powers of attorney, asset protection plans, nursing homes, Medicaid, and elder law. We do not provide legal advice; the client should consult their attorney for legal advice.

We gather required client information through in-depth personal interviews as well as from the documents that are provided by the client to us. Information gathered includes the client's current financial status, tax status, future goals, returns, objectives and attitudes towards risk. We carefully review information and documents supplied by the client in developing a financial plan. Should the client choose to implement the recommendations contained in the plan, we suggest that the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.

We also provide general non-securities advice on topics that may include tax and budgetary planning, estate planning and business planning.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic basis and will generally include advice regarding the following securities:

- Exchange-listed securities;
- Securities traded over-the-counter;
- Foreign issuers;
- Warrants;
- Corporate debt securities (other than commercial paper);

- Commercial paper;
- Certificates of deposit;
- Municipal securities;
- Variable life insurance;
- Variable annuities;
- Mutual fund shares;
- United States governmental securities;
- Options contracts on securities;
- Options contracts on commodities;
- Futures contracts on tangibles;
- Futures contracts on intangibles;
- Interests in partnerships investing in real estate;
- Interests in partnerships investing in oil and gas interests;
- Interests in partnerships investing in other types of business and/or securities; and,
- Any other security that is widely traded on a public exchange for which an independently audited financial statement is readily available.

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client’s stated investment objectives, tolerance for risk, liquidity, and suitability.

#### **RETIREMENT PLAN SERVICES PROGRAM**

DHJJ Financial Advisors also provides retirement plan services, pursuant to which it assists sponsors of self-directed retirement plans with the selection and/or monitoring of investment alternatives (generally open-end mutual funds and asset allocation models) from which plan participants shall choose in self-directing the investments for their individual plan retirement accounts. In addition, to the extent requested by the plan sponsor, DHJJ Financial Advisors shall also provide participant education designed to assist participants in identifying the appropriate investment strategy for their retirement plan accounts. The terms and conditions of the engagement shall generally be set forth in a Retirement Plan Services Agreement between DHJJ Financial Advisors and the plan sponsor.

#### **TAX PREPARATION**

Certain advisors of DHJJ Financial Advisors may offer tax preparation services through our affiliate, DiGiovine Hnilo Jordan + Johnson LTD., a Certified Public Accounting firm (“CPA”). If a client determines to engage CPA, he/she does so per the terms and conditions of a separate written agreement between CPA and the client, to which DHJJ Financial Advisors is not a party. There is no fee-sharing arrangement between the CPA and DHJJ Financial Advisors. The recommendation by DHJJ Financial Advisors that a client engage CPA for tax preparation and/or accounting-related services, presents a conflict of interest because DHJJ Financial Advisors' affiliate will derive additional compensation from such engagement. No client or prospective client is obligated to engage CPA. Clients are reminded that they can engage other, non-affiliated, providers. DHJJ Financial Advisors will work with the tax professional of the client’s choosing.

#### **MISCELLANEOUS**

**Limitations of Financial Planning and Non-Investment Consulting/Implementation Services.** To the extent requested by a client, DHJJ Financial Advisors shall generally provide financial planning and related consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. DHJJ Financial Advisors **does not** serve as an attorney, accountant, or insurance agency, and no portion of our services should be construed as same. Accordingly, DHJJ Financial Advisors **does not** prepare estate planning

documents, tax returns, or sell insurance products. To the extent requested by a client, we may recommend the services of other professionals for certain non-investment implementation purpose (i.e., attorneys, accountants, insurance, etc.), including its affiliated certified public accounting firm, DHJJ. A client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation that we make. Please Note: If the client engages any unaffiliated recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

**Non-Discretionary Service Limitations.** Clients that determine to engage DHJJ Financial Advisors on a non-discretionary investment advisory basis must be willing to accept that DHJJ Financial Advisors cannot effect any account transactions without obtaining prior consent to any such transaction(s) from the client. Thus, in the event that DHJJ Financial Advisors would like to make a transaction for a client's account, and client is unavailable, DHJJ Financial Advisors will be unable to effect the account transaction (as it would for its discretionary clients) without first obtaining the client's consent.

**Cash Positions.** DHJJ Financial Advisors continues to treat cash as an asset class. As such, unless determined to the contrary by DHJJ Financial Advisors, all cash positions (money markets, etc.) shall continue to be included as part of assets under management for purposes of calculating DHJJ Financial Advisors' advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), DHJJ Financial Advisors may maintain cash positions for defensive purposes. In addition, while assets are maintained in cash, such amounts could miss market advances. Depending upon current yields, at any point in time, DHJJ Financial Advisors' advisory fee could exceed the interest paid by the client's money market fund.

**Cash Sweep Accounts.** Certain account custodians can require that cash proceeds from account transactions or new deposits, be swept to and/or initially maintained in a specific custodian designated sweep account. The yield on the sweep account will generally be lower than those available for other money market accounts. When this occurs, to help mitigate the corresponding yield dispersion, DHJJ Financial Advisors shall (usually within 30 days thereafter) generally (with exceptions) purchase a higher yielding money market fund (or other type security) available on the custodian's platform, unless DHJJ Financial Advisors reasonably anticipates that it will utilize the cash proceeds during the subsequent 30-day period to purchase additional investments for the client's account. Exceptions and/or modifications can and will occur with respect to all or a portion of the cash balances for various reasons, including, but not limited to the amount of dispersion between the sweep account and a money market fund, the size of the cash balance, an indication from the client of an imminent need for such cash, or the client has a demonstrated history of writing checks from the account. **Please Note:** The above does not apply to the cash component maintained within a DHJJ Financial Advisors actively managed investment strategy (the cash balances for which shall generally remain in the custodian designated cash sweep account), an indication from the client of a need for access to such cash, assets allocated to an unaffiliated investment manager, and cash balances maintained for fee billing purposes. **Please Also Note:** The client shall remain exclusively responsible for yield dispersion/cash balance decisions and corresponding transactions for cash balances maintained in any DHJJ Financial Advisors unmanaged accounts.

**Borrowing Against Assets/Risks.** A client who has a need to borrow money could determine to do so by using:

- **Margin-**The account custodian or broker-dealer lends money to the client. The custodian charges the client interest for the right to borrow money, and uses the assets in the client's brokerage account as collateral; and,
- **Pledged Assets Loan-** In consideration for a lender (i.e., a bank, etc.) to make a loan to the client, the client pledges investment assets held at the account custodian as collateral.

These above-described collateralized loans are generally utilized because they typically provide more

favorable interest rates than standard commercial loans. These types of collateralized loans can assist with a pending home purchase, permit the retirement of more expensive debt, or enable borrowing in lieu of liquidating existing account positions and incurring capital gains taxes. However, such loans are not without potential material risk to the client's investment assets. The lender (i.e., custodian, bank, etc.) will have recourse against the client's investment assets in the event of loan default or if the assets fall below a certain level. For this reason, DHJJ Financial Advisors does not recommend such borrowing unless it is for specific short-term purposes (i.e., a bridge loan to purchase a new residence). DHJJ Financial Advisors does not recommend such borrowing for investment purposes (i.e., to invest borrowed funds in the market). Regardless, if the client was to determine to utilize margin or a pledged assets loan, the following economic benefits would inure to DHJJ Financial Advisors:

- by taking the loan rather than liquidating assets in the client's account, DHJJ Financial Advisors continues to earn a fee on such Account assets; and,
- if the client invests any portion of the loan proceeds in an account to be managed by DHJJ Financial Advisors, DHJJ Financial Advisors will receive an advisory fee on the invested amount; and,
- if DHJJ Financial Advisors' advisory fee is based upon the higher margined account value, DHJJ Financial Advisors will earn a correspondingly higher advisory fee. This could provide DHJJ Financial Advisors with a disincentive to encourage the client to discontinue the use of margin.

**Please Note:** The Client must accept the above risks and potential corresponding consequences associated with the use of margin or a pledged assets loan.

**Use of Mutual Funds and Exchange Traded Funds.** DHJJ Financial Advisors utilizes mutual funds and exchange traded funds for its client portfolios. In addition to DHJJ Financial Advisors' investment advisory fee described below, and transaction and/or custodial fees discussed above, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g., management fees and other fund expenses). The mutual funds and exchange traded funds utilized by DHJJ Financial Advisors are generally available directly to the public. Thus, a client can generally obtain the funds recommended and/or utilized by DHJJ Financial Advisors independent of engaging DHJJ Financial Advisors as an investment advisor. However, if a prospective client does so, then they will not receive DHJJ Financial Advisors' initial and ongoing investment advisory services.

**Structured Notes.** DHJJ Financial Advisors may purchase Structured Notes for client accounts. A Structured Note is a financial instrument that combines two elements, a debt security and exposure to an underlying asset or assets. It is essentially a note, carrying counter party risk of the issuer. However, the return on the note is linked to the return of an underlying asset or assets (such as the S&P 500 Index or commodities). It is this latter feature that makes structured products unique, as the payout can be used to provide some degree of principal protection, leveraged returns (but usually with some cap on the maximum return), and be tailored to a specific market or economic view. Structured Notes will generally be subject to liquidity constraints, such that the sale thereof before maturity will be limited, and any sale before the maturity date could result in a substantial loss. There can be no assurance that the Structured Notes investment will be profitable, equal any historical performance level(s), or prove successful. If the issuer of the Structured Note defaults, the entire value of the investment could be lost. **In the event that a client has any questions regarding the purchase of Structured Notes for their account or would like to place restrictions on the purchase of Structured Notes for their accounts, DHJJ Financial Advisors' Chief Compliance Officer, Camilla Corso, remains available to address them. See Risks Associated with Structured Notes at Item 8 below.**

**Retirement Rollovers-No Obligation/Conflict of Interest.** A client leaving an employer typically has four options (and may engage in a combination of these options): i) leave the money in his former employer's plan, if permitted, ii) roll over the assets to his/her new employer's plan, if one is available and rollovers are permitted, iii) rollover to an IRA, or iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). DHJJ Financial Advisors may recommend an investor roll over plan

assets to an Individual Retirement Account (IRA) advised by DHJJ Financial Advisors. As a result, DHJJ Financial Advisors and its representatives may earn an asset-based fee. In contrast, a recommendation that a client or prospective client leave his or her plan assets with his or her old employer or roll over the assets to a plan sponsored by a new employer will generally result in no compensation to DHJJ Financial Advisors (unless you engage DHJJ Financial Advisors to monitor and/or advise on the account while maintained with the client's employer). DHJJ Financial Advisors has an economic incentive to encourage an investor to roll plan assets into an IRA that DHJJ Financial Advisors will advise on or to engage DHJJ Financial Advisors to monitor and/or advise on the account while maintained with the client's employer. If DHJJ Financial Advisors recommends that a client roll over their retirement plan assets into an account to be managed by the DHJJ Financial Advisors, such a recommendation creates a conflict of interest if DHJJ Financial Advisors will earn an advisory fee on the rolled over assets. There are various factors that DHJJ Financial Advisors may consider before recommending a rollover, including but not limited to: i) the investment options available in the plan versus the investment options available in an IRA, ii) fees and expenses in the plan versus the fees and expenses in an IRA, iii) the services and responsiveness of the plan's investment professionals versus those of DHJJ Financial Advisors, iv) protection of assets from creditors and legal judgments, v) required minimum distributions and age considerations, and vi) employer stock tax consequences, if any. **No client is under any obligation to roll over plan assets to an IRA advised by DHJJ Financial Advisors or to engage DHJJ Financial Advisors to monitor and/or advise on the account while maintained with the client's employer.**

**Artificial Intelligence.** DHJJ Financial Advisors may use certain Artificial Intelligence ("AI") tools in connection with its investment advisory services. DHJJ Financial Advisors has adopted an AI Policy that governs the appropriate use of AI tools to ensure that DHJJ Financial Advisors and its employees abide by their fiduciary duty and comply with all applicable regulations. AI tools are not used by DHJJ Financial Advisors as a substitute for professional judgment by DHJJ Financial Advisors or its employees, and all AI generated output is reviewed by DHJJ Financial Advisors for accuracy. All investment decisions and recommendations are made and approved by DHJJ Financial Advisors. The use of AI tools does not guarantee the accuracy of analyses or the success of any investment strategy. Clients should not assume that reliance on AI tools results in better performance or reduces risk. AI tools involve limitations and risks that DHJJ Financial Advisors monitors and manages. These risks include, but are not limited to, data security concerns, potential inaccuracies, and possible algorithmic biases. To mitigate these risks, DHJJ Financial Advisors has implemented controls such as pre-approval requirements for AI tools, restrictions on providing nonpublic personal information to public AI systems, vendor due diligence, review of AI-generated materials, and employee training on appropriate AI usage.

**Bitcoin, Cryptocurrency, and Digital Assets.** For clients who want exposure to Bitcoin, cryptocurrencies, or digital assets, DHJJ Financial Advisors will advise the client to consider a potential investment in corresponding exchange traded securities, or an allocation to separate account managers and/or private funds that provide cryptocurrency exposure. Bitcoin and cryptocurrencies are digital assets that can be used for various purposes, including transactions, decentralized applications, and speculative investments. Most digital assets use blockchain technology, an advanced cryptographic digital ledger to secure transactions and validate asset ownership. Unlike conventional currencies issued and regulated by monetary authorities, cryptocurrencies generally operate without centralized control, and their value is determined by market supply and demand. While regulatory oversight of digital assets has evolved significantly since their inception, they remain subject to variable regulatory treatment globally, which may impact their risk profile and liquidity. Given that cryptocurrency investments are speculative and subject to extreme price volatility, liquidity constraints, and the potential for total loss of principal, DHJJ Financial Advisors does not exercise discretionary authority to purchase cryptocurrency investments for client accounts. Any investment in, including the purchase or sale of, cryptocurrencies must be expressly authorized by the client. DHJJ Financial Advisors does not recommend or advocate for the purchase of, or investment in, Bitcoin, cryptocurrencies, or digital assets. Such investments are considered speculative and carry significant risk. Clients who authorize the purchase of a cryptocurrency investment must be prepared for the potential for liquidity constraints, extreme price volatility, regulatory risk, technological risk, security and custody risk, and complete loss of principal. DHJJ Financial Advisors will only purchase or sell such assets at express client request. Furthermore, DHJJ Financial does not bill on these assets.

**351 Exchange ETFs.** DHJJ Financial Advisors may, in certain circumstances, invest client assets in 351 Exchange ETFs which seek to achieve long-term capital appreciation by providing broadly diversified exposure to the U.S. equity market through a diverse group of U.S. companies across market sectors, styles (e.g., value or growth) and industry groups, or through investments in other ETFs that provide similar exposure. 351 Exchange ETFs are structured to accept in-kind contributions of appreciated securities pursuant to Section 351 of the Internal Revenue Code. A Section 351 exchange permits an investor to transfer ownership of a basket of securities with unrealized capital gains into a newly formed ETF without recognizing those gains at the time of transfer, subject to certain conditions. DHJJ Financial Advisors may recommend a Section 351 exchange into a corresponding 351 Exchange ETF where it determines, in consultation with the client and the client's tax professional, that such a transaction is appropriate for the client's circumstances. **Please note:** Section 351 exchanges are complex, and clients should consult with their tax professionals before participating in any such exchange.

**Client Obligations.** In performing our services, DHJJ Financial Advisors shall not be required to verify any information received from the client or from the client's other professionals and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify us if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising our previous recommendations and/or services.

**Investment Risk.** Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by DHJJ Financial Advisors) will be profitable or equal any specific performance level(s).

**Cybersecurity Risk.** The information technology systems and networks that DHJJ Financial Advisors and its third-party service providers use to provide services to DHJJ Financial Advisors' clients employ various controls that are designed to prevent cybersecurity incidents stemming from intentional or unintentional actions that could cause significant interruptions in DHJJ Financial Advisors' operations and/or result in the unauthorized acquisition or use of clients' confidential or non-public personal information. Clients and DHJJ Financial Advisors are nonetheless subject to the risk of cybersecurity incidents that could ultimately cause them to incur financial losses and/or other adverse consequences. Although DHJJ Financial Advisors has established processes to reduce the risk of cybersecurity incidents, there is no guarantee that these efforts will always be successful, especially considering that DHJJ Financial Advisors does not control the cybersecurity measures and policies employed by third-party service providers, issuers of securities, broker-dealers, qualified custodians, governmental and other regulatory authorities, exchanges and other financial market operators and providers.

**Client Privacy and Confidentiality.** DHJJ Financial Advisors maintains policies and procedures designed to help protect the confidentiality and security of client nonpublic personal information ("NPPI"). NPPI includes, but is not limited to, social security numbers, credit or debit card numbers, state identification card numbers, driver's license numbers and account numbers. DHJJ Financial Advisors maintains administrative, technical, and physical safeguards designed to protect such information from unauthorized access, use, loss, or destruction. These safeguards include controls relating to data access, information security, and incident response, and are reviewed to address changes in risk and business. Client information may be disclosed in response to regulatory requests, legal obligations, or as otherwise permitted by law, and any such disclosure is made in accordance with applicable privacy and confidentiality requirements. DHJJ Financial Advisors may engage non-affiliated service providers in connection with providing advisory services, and such providers may have access to client NPPI, as necessary, to perform their functions. These service providers represent to DHJJ Financial Advisors that they maintain safeguards designed to protect client information from unauthorized access or use and that they will provide notice to DHJJ Financial Advisors in the event of a cybersecurity incident involving client information. While DHJJ Financial Advisors maintains policies and

procedures designed to protect client information, such measures cannot eliminate all risk. Upon becoming aware of a data breach involving a client's NPPI, DHJJ Financial Advisors will notify clients of such breach as may be required by applicable state and federal laws.

**Disclosure Brochure.** A copy of DHJJ Financial Advisors' written Brochure as set forth on Part 2A of Form ADV and Form CRS (Client Relationship Summary) shall be provided to each client prior to, or contemporaneously with, the execution of an agreement between the client and DHJJ Financial Advisors.

#### **WRAP FEE PROGRAMS**

DHJJ Financial Advisors does not participate in wrap fee programs.

#### **AMOUNT OF MANAGED ASSETS**

As of 12/31/202, DHJJ Financial Advisors manages a total of \$623,433,866 of assets. Discretionary accounts were valued at \$598,444,466 while non-discretionary accounts were valued at \$24,989,400.

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

##### **INDIVIDUAL SUPERVISORY SERVICES INDIVIDUAL PORTFOLIO MANAGEMENT FEES**

The annualized fee for Investment Supervisory Services will be charged as a percentage of assets under management, according to the following schedule:

<b><u>Assets Under Management</u></b>	<b><u>Annual Fee</u></b>
\$250,000 BUT LESS THAN \$500,000	1.50% (.0150)
\$500,000 BUT LESS THAN \$1,000,000	1.25% (.0125)
\$1,000,000 BUT LESS THAN \$2,000,000	1.00% (.0100)
\$2,000,000 BUT LESS THAN \$5,000,000	0.75% (.0075)
\$5,000,000 BUT LESS THAN \$10,000,000	0.65% (.0065)
\$10,000,000 OR MORE	0.50% (.0050)

Although we do not have a minimum account size, if a client maintains less than \$250,000 of assets under DHJJ Financial Advisor's management, an annual fee of 1.75% will be charged. We may group certain related client accounts for the purposes of determining the annualized fee. Exceptions to the published fee schedule may be considered on a case-by-case basis. Fees may vary from the above schedule depending upon the extent of the services provided and the cost of such services.

Fee schedules can be complex and difficult to understand. Many financial advisors utilize a "tiered" fee schedule when calculating their investment advisory fees. DHJJ Financial Advisors utilizes a "straight percentage" method when calculating our investment advisory fees. The following example illustrates the difference between the two methods:

<b>Fee Schedule Example</b>	
<b><u>Tiered</u></b>	<b><u>Straight Percentage*</u></b>
\$250,000 to \$500,000..... 1.50%	Assuming the same fee schedule, but utilizing a “straight percentage” method (rather than tiered), the same client would only pay \$15,000 (\$1,500,000 x 1.00%) in advisory fees annually or \$3,750 quarterly.
\$500,000 to \$1,000,000..... 1.25%	
\$1,000,000 to \$2,000,000..... 1.00%	
\$2,000,000 to \$5,000,000..... 0.75%	
A client with a \$1,500,000 portfolio would pay \$18,750 (\$7,500 + \$6,250 + \$5,000) in advisory fees annually, or \$4,687.50 quarterly.	*DHJJ Financial Advisors utilizes a “straight percentage” method.

Management fees are billed quarterly, in advance, at the beginning of each calendar quarter based upon the total market value of the client’s account at the end of the previous quarter. Fees will be debited from the account in accordance with the client authorization in the Investment Advisory Agreement. Fees are calculated on the basis of total market value of the client’s account at the time the account is opened through DHJJ Financial Advisors and quarterly thereafter based on the account valuation on the last business day of the preceding quarter. Management fees on new accounts will be payable in advance for the remainder of the current quarter on a pro rata basis. Collected but unearned management fees are refundable to the client on a pro rata basis if the agreement is terminated.

All management fees paid to DHJJ Financial Advisors for investment supervisory services are separate from the fees and expenses charged to shareholders of mutual fund shares by the mutual funds and a complete explanation of these expenses charged by the mutual funds is contained in each mutual fund’s prospectus. Clients are encouraged to read the fund prospectus. Clients may also be assessed transaction charges by Charles Schwab & Co., Inc., when purchasing or redeeming securities.

**Fee Dispersion.** DHJJ Financial Advisors, in its discretion, may charge a lesser or higher investment advisory fee, charge a flat fee, waive applicable minimum asset or minimum fee levels, waive its fee entirely, or charge fee on a different interval, based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, complexity of the engagement, anticipated services to be rendered, grandfathered fee schedules, employees and family members, courtesy accounts, competition, negotiations with client, etc.). **Please Note:** As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees.

**Please Also Note:** In the event that the client is subject to an annual minimum fee, the client could pay a higher percentage fee than referenced above. **ANY QUESTIONS:** DHJJ Financial Advisors’ Chief Compliance Officer, Camilla Corso, remains available to address any questions that a client or prospective client may have regarding advisory fees.

**Custodian Charges-Additional Fees.** As discussed below at Item 12 below, when requested to recommend a broker-dealer/custodian for client accounts, DHJJ Financial Advisors generally recommends that *Schwab* serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as *Schwab* charge brokerage commissions, transaction, and/or other type fees for effecting certain types of securities transactions (i.e., including transaction fees for certain mutual funds, and mark-ups and mark-downs charged for fixed income transactions, etc.). The types of securities for which transaction fees, commissions, and/or other type fees (as well as the amount of those fees) shall differ depending upon the broker-dealer/custodian. While certain custodians, including *Schwab*, generally (with exceptions) do not currently charge fees on individual equity transactions (including ETFs), others do. **Please Note:** there can be no assurance that *Schwab* will not change its transaction fee pricing in the future. **Please Also Note:** *Schwab*

may also assess fees to clients who elect to receive trade confirmations and account statements by regular mail rather than electronically.

### FINANCIAL PLANNING FEES

DHJJ Financial Advisors' financial planning fees will be determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client.

Our financial planning fees are calculated and charged on an hourly basis, ranging from \$150 to \$495 per hour, depending on the complexity of the plan or the experience level of the advisor providing the advice. Although the length of time it will take to provide a financial plan will depend on each client's personal situation, we will provide an estimate for the total hours at the start of the advisory relationship. Full disclosure of the fees and charges are made prior to providing the service and, in all cases, the fees are payable by the client at the end of the financial planning engagement.

For written financial plans or correspondence, fees are negotiated with the client prior to the preparation of the written financial plan or correspondence and such fees are agreed upon by the written Financial Advisory Agreement. The payment of fees for financial planning services will be due upon completion of the financial plan unless otherwise arranged. If no written financial plan or correspondence is required, then the fee for services is payable at the conclusion of each conference. The client will be billed in arrears based on actual hours accrued.

**Financial Planning Fee Offset:** DHJJ Financial Advisors reserves the discretion to reduce or waive the hourly fee and/or the minimum fixed fee if a financial planning client chooses to engage us for our Investment Supervisory Services.

### RETIREMENT PLAN SERVICES FEES

The annualized fee for Retirement Plan Services will be based upon a percentage of the assets in the Plan (without regard to any Excluded Assets, as defined in the client's Retirement Plan Services Agreement) in accordance with the following Fee Schedule:

PLAN ASSETS	ANNUAL FEE %
\$0-\$1,000,000	\$5,000.00 annual fee
\$1,000,000 but less than \$3,000,000	0.50% (0.0050)
\$3,000,000 but less than \$5,000,000	0.45% (0.0045)
\$5,000,000 but less than \$10,000,000	0.38% (0.0038)
\$10,000,000 but less than \$15,000,000	0.32% (0.0032)
\$15,000,000 but less than \$20,000,000	0.27% (0.0027)
\$20,000,000 OR MORE	0.23% (0.0023)

(Please see our explanation of tiered fees vs straight percentage fees on page 9 of this Brochure.)

Additional services to the Plan, per the Retirement Plan Services Agreement (the "Agreement"), will be billed to the Plan Sponsor and not the Plan Participant at an hourly fee ranging between \$200/hour and \$400/hour, based on the parameters set forth in the Agreement. Except for these additional services set forth in the Agreement and unless otherwise indicated in the Agreement, the only source compensation to be received by DHJJ Financial Advisors shall come from the Plan in accordance with the above fee schedule.

The Firm maintains a minimum fee of \$5,000 for 401(k) Plan clients.

DHJJ Financial Advisors shall be compensated by the Plan Sponsor and/or from each Plan Participant's account for its services as determined by the Plan Sponsor, in accordance with the annual fee schedule above. The fee may include, to the extent directed by the Plan Sponsor, the receipt of 12b-1 and/or shareholder servicing fees to offset a portion of DHJJ Financial Advisors' annual fee; these fees would be received by the custodian/administrator and calculated by them to offset a portion of DHJJ Financial Advisors' annual fee.

**Please Note:** If the Plan Sponsor directs that DHJJ Financial Advisors use funds that pay 12b-1 and/or shareholder servicing fees to offset Plan costs (including professional fees), the Plan Sponsor acknowledges that such funds generally have higher internal expense ratios. Higher expense ratios adversely impact performance.

The fee shall be paid quarterly, in arrears, based upon the market value of the Plan's assets on the last day of the billing quarter, excluding the value of any Excluded Assets. If this Agreement is terminated in the middle of a calendar quarter, the fee shall be prorated for the number of days in the billing quarter until the effective date of termination, based on the market value of the Plan assets on the effective date of termination, and will return to the Plan any amount received in excess of such amount.

All management fees paid to DHJJ Financial Advisors for retirement plan services are separate from the fees and expenses charged to shareholders of mutual fund shares by the mutual funds and a complete explanation of these expenses charged by the mutual funds is contained in each mutual fund's prospectus. Plan Sponsors and Plan Participants are encouraged to read the fund prospectus.

**Limited Negotiability of Advisory Fees:** Although DHJJ Financial Advisors has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a plan-by-plan basis. Facts, circumstances and needs of the Plan Participant/Plan Sponsor will be considered in determining the fee schedule. The specific annual fee schedule will be identified in the contract between DHJJ Financial Advisors and the Plan Sponsor.

#### **GENERAL INFORMATION**

**Termination of the Advisory Relationship:** An Investment Supervisory Services client agreement may be canceled at any time, by either party, for any reason upon receipt of written notice. For clients who select financial planning services only (no assets under management services), the agreement terminates upon receipt of the written financial plan or correspondence, or if no written financial plan or correspondence is required, then the agreement terminates at the conclusion of the final conference. For clients who select assets under management services, the agreement shall terminate at the time that the asset management account(s) are closed or transferred from the Firm's management. As disclosed above, certain fees are paid in advance of services provided. Upon termination of the agreement, any prepaid, unearned fees will be promptly refunded. In calculating a client's reimbursement of fees, we will prorate the reimbursement according to the number of days remaining in the billing period. A Retirement Plan Services Agreement shall continue until terminated by either party upon thirty (30) days written notice. In the event a Retirement Plan Services Agreement is terminated by the Plan Sponsor less than one (1) year from the date of the execution of that agreement, the Plan Sponsor acknowledges that it, and not the Plan or its participants, will be exclusively responsible for an early termination fee, to allow DHJJ Financial Advisors to recoup reasonable start-up costs. Such early termination fee shall be \$5,000 less any fees already paid in the initial one (1) year period.

**Mutual Fund Fees:** All fees paid to DHJJ Financial Advisors for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or exchange-traded funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally

include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our Firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

**Additional Fees and Expenses:** In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker-dealers, including, but not limited to, any transaction charges imposed by a broker-dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

For Retirement Plan Services Programs, plan sponsors and/or plan participants are also responsible for fees and expenses charged by Vanguard/Ascensus as the custodian/administrator of the Retirement Plan, as well as any travel-related expenses incurred by DHJJ Financial Advisors for any plan-related travel.

**ERISA Accounts:** DHJJ Financial Advisors is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"). As such, our Firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, DHJJ Financial Advisors may only charge fees for investment advice about products for which our Firm and/or our related persons do not receive any commissions or 12b-1 fees. Our investment recommendations are not limited to any specific product or service offered by any broker-dealer or insurance company. All recommendations are of a generic nature.

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

DHJJ Financial Advisors does not charge performance-based fees and does not participate in side-by-side management.

#### **Item 7 – Types of Clients**

DHJJ Financial Advisors does not maintain a minimum account size and provides advisory services to the following types of clients: individuals (other than high net worth individuals); high net worth individuals; pension, retirement, and profit sharing plans (other than plan participants); corporations, partnerships, LLC's, or other businesses, not listed above; etc.

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

##### **METHODS OF ANALYSIS**

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

**Fundamental Analysis:** We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the security is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Fundamental analysis does not attempt to

anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the security.

**Cyclical Analysis:** In this type of technical analysis, we measure the movements of a particular security against the overall market in an attempt to predict the price movement of the security.

**Asset Allocation:** Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry, or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

**Mutual Fund and/or Exchange-Traded Fund ("ETF") Analysis:** We examine the experience and track record of the manager of the mutual fund and/or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

**Risks for all forms of analysis:** Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

## INVESTMENT STRATEGIES

We use the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

**Long-term purchases:** We purchase securities with the idea of holding them in the client's account for a year or longer. Typically, we employ this strategy when:

- We believe the securities to be currently undervalued; and/or
- We want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

**Short-term purchases:** When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase. However, if our predictions are incorrect, there is a risk that losses can mount quickly. This is not the primary strategy used by DHJJ.

## **RISK OF LOSS**

**Risk of Loss:** Securities investments are not guaranteed, and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

### **Risks Associated with Structured Notes**

A Structured Note is a financial instrument that combines two elements, a debt security and exposure to an underlying asset or assets. It is essentially a note, carrying counter party risk of the issuer. However, the return on the note is linked to the return of an underlying asset or assets (such as the S&P 500 Index or commodities).

Structured notes do not pay interest, dividend payments, provide voting rights or guarantee any return of principal at maturity unless specifically provided through products that are designed with this purpose in mind. Most Structured Note payments are based on the performance of an underlying index (i.e., S&P 500) and if the underlying index were to decline 100% then the payment may result in a loss of a portion or all of a client's principal. Notes are not insured through any governmental agency or program and the return of principal and fulfillment of the terms negotiated by DHJJ Financial Advisors on behalf of clients is dependent on the financial condition of the third party issuing the note and the issuer's ability to pay its obligations as they become due.

Structured Notes will generally be subject to liquidity constraints, such that the sale thereof before maturity can be limited. Structured Notes will not be listed on any securities exchange. There may be no secondary market for such Structured Notes. The price, if any, at which an issuer will be willing to purchase Structured Notes from clients in a secondary market transaction, if at all, will likely be lower than the original issue price and any sale before the maturity date could result in a substantial loss. Structured Notes are not designed to be short-term trading instruments so clients should be willing to hold any notes to maturity.

The issuer can generally choose to redeem Structured Notes before maturity. In addition, the maximum potential payment on Structured Notes will typically be limited to the redemption amount applicable for a payment date, regardless of the appreciation in the underlying index associated with the note. Since the level of the underlying index at various times during the term of the Structured Notes held by clients could be higher than on the valuation dates and at maturity, clients may receive a lower payment if redeemed early or at maturity than if a client would have invested directly in the underlying index.

**Please Note:** Past performance is no guarantee of future results. Different types of investments involve varying degrees of risk. Therefore, there can be no assurance that the future performance of any specific investment or investment strategy, including the investments and/or investment strategies recommended and/or undertaken by will be profitable, equal any historical performance level(s), or prove successful. **Please Also Note:** If the issuer of the Structured Note defaults, the entire value of the investment could be lost. **ANY QUESTIONS: DHJJ Financial Advisors' Chief Compliance Officer, Camilla Corso, remains available to address them.**

**In the event that the client seeks to prohibit or limit the purchase of structured notes for the client's account, the client can do so, in writing, addressed to DHJJ Financial Advisors' Chief Compliance Officer. In**

**the event that a client has any questions regarding structured notes, DHJJ Financial Advisors' Chief Compliance Officer, Camilla Corso, remains available to address them.**

## OPTIONS STRATEGIES

In limited situations, generally upon client direction and consent, DHJJ Financial Advisors may engage in options transactions (or engage an independent investment manager to do so) for the purpose of hedging risk and/or generating portfolio income. The use of options transactions as an investment strategy can involve a high level of inherent risk. Option transactions establish a contract between two parties concerning the buying or selling of an asset at a predetermined price during a specific period of time. During the term of the option contract, the buyer of the option gains the right to demand fulfillment by the seller. Fulfillment may take the form of either selling or purchasing a security, depending upon the nature of the option contract. Generally, the purchase or sale of an option contract shall be with the intent of "hedging" a potential market risk in a client's portfolio and/or generating income for a client's portfolio. **Please Note:** Certain options-related strategies (i.e., straddles, short positions, etc.), may, in and of themselves, produce principal volatility and/or risk. Thus, a client must be willing to accept these enhanced volatility and principal risks associated with such strategies. In light of these enhanced risks, client may direct DHJJ Financial Advisors, in writing, not to employ any or all such strategies for his/her/their/its accounts.

### **Covered Call Writing.**

Covered call writing is the sale of in-, at-, or out-of-the-money call options against a long security position held in a client portfolio. This type of transaction is intended to generate income. It also serves to create partial downside protection in the event the security position declines in value. Income is received from the proceeds of the option sale. Such income may be reduced or lost to the extent it is determined to buy back the option position before its expiration. There can be no assurance that the security will not be called away by the option buyer, which will result in the client (option writer) lose ownership in the security and incur potential unintended tax consequences. Covered call strategies are generally better suited for positions with lower price volatility.

### **Long Put Option Purchases.**

Long put option purchases allow the option holder to sell or "put" the underlying security at the contract strike price at a future date. If the price of the underlying security declines in value, the value of the long put option can increase in value depending upon the strike price and expiration. Long puts are often used to hedge a long stock position to protect against downside risk. The security/portfolio could still experience losses depending on the quantity of the puts purchased, strike price and expiration. In the event that the security is put to the option holder, it will result in the client (option seller) to lose ownership in the security and to incur potential unintended tax consequences. Options are wasting assets and expire (usually within months of issuance).

**Please Note:** There can be no guarantee that an options strategy will achieve its objective or prove successful. No client is under any obligation to enter into any option transactions. However, if the client does so, he/she must be prepared to accept the potential for unintended or undesired consequences (i.e., losing ownership of the security, incurring capital gains taxes). **ANY QUESTIONS:** DHJJ Financial Advisors' Chief Compliance Officer, Camilla C. Corso, remains available to address any questions that a client or prospective client may have regarding options.

## **Item 9 – Disciplinary Information**

Registered investment advisors are required to disclose any legal or disciplinary event that would be material to a client's or prospective client's evaluation of our Firm, our advisory business, or the integrity of our

management. Our Firm and our management personnel have no reportable legal or disciplinary events to disclose.

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

Neither the Firm nor any of its management persons is registered or has an application pending to register as a broker-dealer, or associated person of a broker-dealer. Neither the Firm nor any of its management persons are registered or has an application pending to register as a commissions merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

The shareholders of DHJJ Financial Advisors are also shareholders in the accounting firm of DHJJ, where they are individually licensed and practicing Certified Public Accountants providing accounting services for separate and typical compensation.

The shareholders of the accounting firm DHJJ typically recommend DHJJ Financial Advisors to accounting clients in need of advisory services. Conversely, the shareholders of the advisory firm DHJJ Financial Advisors typically recommend DHJJ to advisory clients in need of accounting services. Thus, a conflict of interest may exist since the two firms are affiliated companies. Accounting services provided by DHJJ are separate and distinct from our advisory services and are provided for separate and typical compensation. There are no referral fee arrangements between our Firms for these recommendations. No DHJJ Financial Advisors client is obligated to use DHJJ for any accounting services and conversely, no accounting client is obligated to use the advisory services provided by us. DHJJ's accounting services do not include the authority to sign checks or otherwise disburse funds on any of our advisory client's behalf.

Paul A. Minta, one of the shareholders, may spend as much as 5% of his time working in the accounting practice. Terrence J. Cicero, another one of the shareholders, may spend as much as 30% of his time working in the accounting practice. Camilla C. Corso, another one of the shareholders, may spend as much as 30% of her time working in the accounting practice. Kathy Byrne, another shareholder, may spend up to 35% of her time working in the accounting practice. The other shareholders spend 100% of their time working in the accounting practice. Many of the clients of the advisory firm are also clients of the accounting firm.

Please Also Note-Conflict of Interest: As indicated above at Item 4, to the extent requested by a client, DHJJ Financial Advisors may recommend the services of other professionals for certain non-investment implementation purposes (i.e., attorneys, accountants, insurance, etc.), including its affiliated certified public accounting firm, DHJJ.

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

DHJJ Financial Advisors has adopted a Code of Ethics ("Code") which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws. The adoption of this Code is required for us to comply with Rule 204A-1 under the Investment Advisers Act of 1940 ("Advisers Act"). This Code establishes rules of conduct for all employees of DHJJ Financial Advisors and is designed to, among other things, govern personal securities trading activities in the accounts of employees. The Code is based upon the principle that we owe a fiduciary duty to our clients to conduct our affairs, including our personal securities transactions, in such a manner as to avoid (i) serving our own personal interests ahead of clients, (ii) taking inappropriate advantage of our positions with the firm, and (iii) any actual or potential conflicts of interest or any abuse of our positions of trust and responsibility.

The Code is designed to ensure that the high ethical standards long maintained by DHJJ Financial Advisors continue to be applied. The purpose of the Code is to preclude activities which may lead to or give the

appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. The name and reputation of our Firm continues to be a direct reflection of the conduct of each employee.

Pursuant to Section 206 of the Advisers Act, both DHJJ Financial Advisors and its employees are prohibited from engaging in fraudulent, deceptive, or manipulative conduct. Compliance with this section involves more than acting with honesty and good faith alone. It means that the firm and its employees have an affirmative duty of utmost good faith to act solely in the best interest of its clients and to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to [ccorso@dhjj.com](mailto:ccorso@dhjj.com), or by calling us at 630.420.1360.

**Prohibition Against Insider Trading:** Trading securities while in possession of material, non-public information, or improperly communicating that information to others may expose DHJJ Financial Advisors and its employees to stringent penalties. The rules contained in this Code apply to securities trading and information handling by supervised persons of DHJJ Financial Advisors and their immediate family members. With respect to insider trading, the general policy of DHJJ Financial Advisors states that no supervised person may trade, either personally or on behalf of others, while in the possession of material, non-public information, nor may any personnel of DHJJ Financial Advisors communicate material, non-public information to others in violation of the law.

**Personal Securities Transactions:** At times, the interests of the advisor or related persons' accounts may coincide with the interests of clients' accounts; however, at no time will the advisor or any related person receive an added benefit or advantage over clients with respect to these transactions. DHJJ Financial Advisors has adopted the following principles governing personal investment activities by DHJJ Financial Advisors' supervised persons: the interests of client accounts will at all times be placed first; all personal securities transactions of supervised persons will be conducted in such manner as to avoid any actual or potential conflict of interest or any abuse of an individual's position of trust and responsibility; and supervised persons must not take inappropriate advantage of their positions. In addition, no supervised persons shall acquire any beneficial ownership of any securities in an Initial Public Offering ("IPO"), a limited offering, or a private placement offering for his or her personal accounts without the written approval of our Firm's Chief Compliance Officer, who must be provided with full details of the proposed transaction.

Our Code of Ethics is designed to assure that the personal securities transactions, activities, and interests of our employees 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.

Our Firm and/or individuals associated with our Firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

It is the expressed policy of our Firm that no person employed by us may knowingly purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

DHJJ Financial Advisors and individuals associated with our Firm are prohibited from engaging in principal transactions and agency cross transactions.

**Protecting the Confidentiality of Client Information:** As a registered investment advisor, DHJJ Financial Advisors and all supervised persons must comply with SEC Regulation S-P, which requires investment advisors

to adopt policies and procedures to protect the “non-public personal information” of clients. DHJJ Financial Advisors is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our Firm in the strictest confidence. These records include all personal information that we collect from our clients in connection with any of the services provided by DHJJ Financial Advisors. We do not disclose any non-public personal information about our clients or former clients to anyone, except as permitted by law.

## **Item 12 – Brokerage Practices**

In the event that the client requests that DHJJ Financial Advisors recommend a broker-dealer/custodian for execution and/or custodial services, DHJJ Financial Advisors generally recommends that investment advisory accounts be maintained at Charles Schwab & Co., Inc., the client will be required to enter into a formal Investment Advisory Agreement with DHJJ Financial Advisors setting forth the terms and conditions under which DHJJ Financial Advisors shall advise on the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that DHJJ Financial Advisors considers in recommending Schwab (or any other broker-dealer/custodian to clients) include historical relationship with DHJJ Financial Advisors, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by DHJJ Financial Advisors’ clients shall comply with DHJJ Financial Advisors’ duty to obtain best execution, a client may pay a commission or transaction fee that is higher than another qualified broker-dealer might charge to effect the same transaction where determined, in good faith, that the commission/transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer’s services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although DHJJ Financial Advisors will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, DHJJ Financial Advisors’ investment advisory fee.

### **Non-Soft Dollar Research and Additional Benefits**

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, DHJJ Financial Advisors may receive from Schwab (or another broker-dealer/custodian, investment manager, platform or fund sponsor, or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist DHJJ Financial Advisors to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by DHJJ Financial Advisors may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support-including client events, computer hardware and/or software and/or other products used by DHJJ Financial Advisors in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that *may* be received may assist DHJJ Financial Advisors in managing and administering client accounts. Others do not directly provide such assistance, but rather assist DHJJ Financial Advisors to manage and further develop its business enterprise.

DHJJ Financial Advisors received a benefit from Schwab in the amount of \$1,500 which must be used for compliance or other vendors associated with the Firm.

DHJJ Financial Advisors' clients do not pay more for investment transactions effected and/or assets maintained at Schwab as a result of this arrangement. There is no corresponding commitment made by the DHJJ Financial Advisors to Schwab or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities, or other investment products as result of the above arrangement.

**Directed Brokerage.** DHJJ Financial Advisors require that its clients utilize the brokerage and custodial services provided by Schwab. DHJJ Financial Advisors does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and DHJJ Financial Advisors will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by DHJJ Financial Advisors. As a result, a client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. In the event that the client directs DHJJ Financial Advisors to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through DHJJ Financial Advisors. Higher transaction costs adversely impact account performance. Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

**Order Aggregation:** Transactions for each client account generally will be effected independently, unless the DHJJ Financial Advisors decides to purchase or sell the same securities for several clients at approximately the same time. DHJJ Financial advisors may (but is not obligated to) combine or "bunch" such orders to obtain better price execution, to negotiate more favorable commission rates, or to allocate equitably among the DHJJ Financial Advisors' client's differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. DHJJ Financial Advisors shall not receive any additional compensation or remuneration as a result of such aggregation.

### **Item 13 – Review of Accounts**

#### **INVESTMENT SUPERVISORY SERVICES INDIVIDUAL PORTFOLIO MANAGEMENT**

**REVIEWS:** While the underlying securities within Individual Portfolio Management accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, tax laws, or the market, political or economic environment.

The principals, managers and associates of our Firm review the investment accounts of their own clients. The reviewers of these accounts include:

- Paul A. Minta, CPA, CFP® (Principal)
- Terrence J. Cicero, CPA, CFP® (Principal)
- Camilla C. Corso, CPA, CFP®, (Principal)

- Kathy T. Byrne, CPA, CFP® (Principal)

**REPORTS:** Clients are sent all required statements, confirmations, and year-end tax reporting information by the custodian of the assets, Charles Schwab & Co., Inc. In addition, DHJJ Financial Advisors will provide clients with portfolio performance reports (at least on an annual basis) which will summarize current portfolio holdings as well as transactions made within their accounts. In the event of a discrepancy between the information provided by DHJJ Financial Advisors and the account custodian, information provided by the account custodian shall prevail.

## **FINANCIAL PLANNING**

**REVIEWS:** While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for.

**REPORTS:** Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for.

## **RETIREMENT PLAN SERVICES**

**REVIEWS:** The underlying securities within the Retirement Plan Services accounts are monitored on a continual basis. DHJJ Financial Advisors shall remain available to meet with the Plan Sponsor on a quarterly basis, and at least annually, to review DHJJ Financial Advisors' services and Plan investment-related matters. Additional review meetings, or additional services may be provided per the Retirement Plan Services Agreement between DHJJ Financial Advisors and the Plan Sponsor.

**REPORTS:** The independent custodian and/or third-party administrator, Vanguard/Ascensus, shall provide quarterly investment reports to the individual participants of the Plan.

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

As referenced in Item 12 above, DHJJ Financial Advisors may receive from Schwab, without cost (and/or at a discount), support services and/or products. DHJJ Financial Advisors' clients do not pay more for investment transactions effected and/or assets maintained at Schwab as result of this arrangement. There is no corresponding commitment made by DHJJ Financial Advisors to Schwab or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities, or other investment products as a result of the above arrangements. Additionally, DHJJ Financial Advisors received a benefit from Schwab in the amount of \$1,500 which must be used for compliance or other vendors associated with the Firm. Other than its employees, DHJJ Financial Advisors does not compensate any person or entity for client referrals.

### **Item 15 – Custody**

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our Firm directly debits advisory fees from client accounts. As part of this billing process, the custodian of our client's accounts is advised of the amount of the fee to be deducted from that client's account. Also, during this billing process, our Firm will prepare and send an invoice to each client showing how the investment management fee for that quarter was calculated. This invoice is just for the client's records so that they will be aware of how their investment management fee for that quarter was calculated; they are instructed by

our Firm not to send us payment for this invoice as the fee was debited directly from their account. On at least a quarterly basis, although usually done monthly, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period. Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement. We encourage our clients to raise any questions with us about the custody, safety, or security of their assets. The custodians we do business with send DHJJ clients independent account statements listing account balance(s), transaction history and any fee debits or other fees taken out of such accounts.

For Retirement Plan Services, specific fee payment arrangements will be determined by the Plan Sponsor upon engaging DHJJ Financial Advisors. The fees charged by DHJJ Financial Advisors may be paid by the Plan Sponsor or Plan Participants. If paid by the Plan Participants, these fees will be directly debited from the Participants' accounts by the custodian of the Retirement Plan Assets, based on the agreement between DHJJ Financial Advisors and the Plan Sponsor.

The SEC issued a no-action letter ("Letter") in February 2017 with respect to the Rule 206(4)-2 ("Custody Rule") under the Advisers Act. The Letter provided guidance on the Custody Rule as well as clarified that an adviser who has the power to disburse client funds to a third party under a standing letter of instruction ("SLOA") is deemed to have custody. DHJJ Financial Advisors will occasionally perform the steps necessary to send funds to a third-party on behalf of a client, which can be deemed as custody by the SEC. These occasional fund transfers are monitored by DHJJ Financial Advisors to ensure that the recipient of a fund transfer through a Standing Letter of Authorization (SLOA) is not a related party of DHJJ Financial Advisors, and does not require that the firm undertake a surprise examination by an independent CPA firm, in accordance with the guidance provided in the February 21, 2017 Investment Adviser Association No-Action Letter and Rule 206(4)-2 under the Advisers Act.

#### **Item 16 – Investment Discretion**

DHJJ Financial Advisors manages individual portfolios which are held with an authorized custodian (Charles Schwab & Co.). We manage these advisory accounts on a discretionary basis. Discretionary authorization is given to DHJJ Financial Advisors to execute trades in our clients' Schwab accounts. Account supervision is guided by the client's stated objectives (i.e., capital preservation, income, growth & income, growth, aggressive growth), as well as tax considerations. Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell.

Clients give us discretionary authority when they sign an Investment Advisory Agreement with our Firm and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions. DHJJ Financial Advisors also manages advisory accounts on a non-discretionary basis whereby it: (i) executes trades for 401(k) accounts as instructed by the individual participants of respective 401(k) accounts; or (ii) on a consulting basis.

DHJJ Financial Advisors provides non-discretionary financial planning services. Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to

predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information, and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service receive a written report which provides the client with a detailed financial plan designed to assist the client in achieving his or her financial goals and objectives. Implementation of financial plan recommendations is entirely at the client's discretion.

DHJJ Financial Advisors also provides retirement plan services, pursuant to which it assists sponsors of self-directed retirement plans with the selection and/or monitoring of investment alternatives (generally open-end mutual funds and asset allocation models) from which plan participants shall choose in self-directing the investments for their individual plan retirement accounts. In addition, to the extent requested by the plan sponsor, DHJJ Financial Advisors shall also provide participant education designed to assist participants in identifying the appropriate investment strategy for their retirement plan accounts. The terms and conditions of the engagement shall generally be set forth in a Retirement Plan Services Agreement between DHJJ Financial Advisors and the plan sponsor.

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

As a matter of Firm policy, DHJJ Financial Advisors does not vote proxies on behalf of clients. Therefore, although our Firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for:

- 1) Directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted; and
- 2) Making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

Clients are responsible for instructing each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. Clients retain full authority and responsibility to vote proxies for account securities.

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

DHJJ Financial Advisors does not require or solicit the prepayment of more than \$1,200 in fees per client, six months or more in advance. Additionally, DHJJ Financial Advisors has never been the subject of a bankruptcy petition and is not aware of any financial condition that could be reasonably expected to impair the Firm's ability to meet its contractual commitments to clients.

**ANY QUESTIONS: DHJJ Financial Advisors' Chief Compliance Officer, Camilla Corso, remains available to address any questions regarding the Firm's Form ADV Part 2A.**



**184 Shuman Boulevard, Suite 200  
Naperville, Illinois 60563**

## **Privacy Policy Statement**

DHJJ Financial Advisors is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our Firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services provided by DHJJ Financial Advisors. We do not disclose any nonpublic personal information about our clients or former clients to anyone, except as permitted by law.

Our policy with respect to personal information about you is listed below.

- As permitted by you in writing, we provide access to nonpublic personal information about you only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law.
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- We do collect personal information in the normal course of business in order to administer your accounts and serve you better.
- We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.
- Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws, and consistent with the CFP Code of Ethics and Professional Responsibility. After this required period of record retention, all such information will be destroyed.