

Ted Buchan & Company

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March 2017

FORM ADV PART 2

BROCHURE

This brochure provides information about the qualifications and business practices of Ted Buchan & Company. If you have any questions about the contents of this brochure, please contact us at (858) 605-0686. 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.

Additional information about Ted Buchan & Company is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Ted Buchan & Company is 140722.

Ted Buchan & Company is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2: Material Changes

Ted Buchan & Company is required to advise you of any material changes to our Firm Brochure (“Brochure”) from our last annual update, identify those changes on the cover page of our Brochure or on the page immediately following the cover page, or in a separate communication accompanying our Brochure. We must state clearly that we are discussing only material changes since the last annual update of our Brochure, and we must provide the date of the last annual update of our Brochure.

We do not have to provide this information to a client or prospective client who has not received a previous version of our brochure.

Last Annual Amendment Filing Date: March 2016

We have made the following material changes since our last annual update.

Item 4 – On April 10, 2017, the Employment Retirement Income Security Act (ERISA) is anticipated to be amended by the Department of Labor. The final regulations defining who is a “fiduciary”, particularly in regards to persons who provide investment advice or recommendations for a fee or other compensation with respect to assets of a plan or IRA will be expanded. As an Accredited Investment Fiduciary (AIF), Ted Buchan & Company advisers have previously acted as fiduciaries to their clients in this regard and will continue to do so in relation to these amendments.

Item 19 – Philip Bell is no longer associated with Ted Buchan & Company and has been removed from this section.

Item 19 – Eric Schmid has become a 10% owner of Ted Buchan & Company and has been added to this section.

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Item 4: Advisory Business

Ted Buchan & Company is principally owned and operated by Ted Buchan. Our firm was established in September 2006. All material conflicts of interest are disclosed below regarding our firm, our representatives or our employees, which could be reasonably expected to impair the rendering of unbiased and objective advice. Please note that lower fees for comparable services may be available from other sources.

On April 10, 2017, the Employment Retirement Income Security Act (ERISA) is anticipated to be amended by the Department of Labor. The final regulations defining who is a “fiduciary”, particularly in regards to persons who provide investment advice or recommendations for a fee or other compensation with respect to assets of a plan or IRA will be expanded. As an Accredited Investment Fiduciary (AIF), Ted Buchan & Company advisers have previously acted as fiduciaries to their clients in this regard and will continue to do so in relation to these amendments.

Ted Buchan & Company offers a wide range of investment advisory services to its clients. The services include:

1) Financial and College Planning Services:

- Modular College Plan
- Modular Retirement Plan
- Modular College & Retirement Plan
- Comprehensive Financial Plan
- Hourly Consulting

Services listed above may include any combination of the following as deemed necessary

- Cash Flow & Budgeting
- Investment & Asset Allocation Analysis
- Asset & Liability Analysis
- Income Tax Planning
- EFC Reduction Strategies
- College Payment Analysis
- College Scenario Planning
- Retirement Accumulation Analysis
- Retirement Scenario Planning

- Retirement Income Distribution planning
- Social Security Strategy Analysis
- Life Insurance Analysis
- Disability Insurance Analysis
- Long Term Care Insurance Analysis
- General Estate Planning

We are required to disclose to our financial planning clients that if a conflict of interest exists between us and our clients. The client is under no obligation to act upon the investment adviser's recommendation. If the client elects to act on our recommendations, the client is under no obligation to effect the transaction through us.

2) Asset Management:

- Client completes Risk Tolerance Questionnaire to determine clients' investment goals.
- Advisor reviews goals of client and time frame the client intends to invest the money.
- The Advisor invests the money based on this analysis and client input.

Ted Buchan & Company tailors the advisory services to the individual needs of each client. Clients can impose restrictions in certain cases.

For Example:

1. Assuming a client had a large investment gain on a particular investment and they did not want to incur the taxes by selling that investment at that time. We would honor that request.
2. Assuming a client inherited an investment from a family member and wanted to keep that particular investment due to sentimental value. We would honor that request.

In order to assist clients in the selection of a third party money manager, we typically gather information from the client about their financial situation, investment objectives, and reasonable restrictions they can impose on the management of the account, which are often very limited. It is important to note that we do not offer advice on any specific securities or other investments in connection with this service. Investment advice and trading of securities is only offered by or through the third party money managers to clients.

We periodically review third party money managers' reports provided to the client. Our associates contact the clients from time to time, as agreed to with the client, in order to review their financial situation and objectives; communicate information to third party money managers as warranted; and, assist the client in understanding and evaluating the services provided by the third party money manager. The client will be expected to notify us of any changes in his/her financial situation, investment objectives, or account restrictions that could

affect their account. The client may also directly contact the third party money manager managing the account or sponsoring the program.

Ted Buchan & Company does not participate in wrap fee programs.

As of December 31, 2016, the amount of client assets managed on a discretionary basis was \$72,516,333 and \$24,208,965 on the non-discretionary basis. The total amount of assets managed was \$96,725,298

Ted Buchan & Company's billing structure is based on ending quarter account balances and billed forward accordingly. The billable assets under management are based on the value of the assets we manage.

Item 5: Fees and Compensation

Ted Buchan & Company Advisors are compensated on a fee only basis. The Fee Schedules are below.

Assets Under Management				
Tiered Fee Schedule				
Acct Value				
Over	But Not Over	Flat Fee	Fee Rate	Tier
\$-	\$119,999	\$1,500		1
\$120,000	\$499,999		1.25%	2
\$500,000	\$999,999		1.10%	3
\$1,000,000	\$1,999,999		1.00%	4
\$1,999,999	\$3,499,999		0.80%	5
\$3,499,999	\$4,999,999		0.65%	6
\$5,000,000	\$7,499,999		0.50%	7
\$7,500,000	\$9,999,999		0.40%	8
\$10,000,000	\$14,999,999		0.35%	9
\$15,000,000	\$24,999,999		0.30%	10

EXTERNAL ACCOUNT FEE SCHEDULE	
Employer Investment Options	Advisory Fee
Less than 8 options	0.50%
8 to 20 options	0.75%
More than 20 options	Current fee

FINANCIAL SERVICES	
Modular College Plan	\$2,500
Modular Retirement Plan	\$2,500
Modular College & Retirement Plan	\$3,000
Comprehensive Financial Plan	\$3,500
Hourly Consulting	\$300 per hour

Fees are not negotiable.

The Client will pay the Advisor a fee quarterly in advance which is deducted from a designated account of the Client's choice. Fees are due on the first day of the calendar quarter. If a client chooses to be invoiced, payment is due within ten business days. Payment is accepted only by check or cashier's check. No cash or credit cards are accepted.

Client fees are paid in advance and will be pro-rated once client terminates the relationship and removes funds from Ted Buchan & Company managed accounts. If money is received in-between billing cycles, a fee is pro-rated based on the fee schedule.

Other fees include custodian (Shareholders Service Group) fees.

Appendix 1 Schedule (effective 12/22/16)

Ted Buchan & Company has no advisor minimum, no account minimums or account inactivity fees.

Ted Buchan & Company uses Shareholders Service Group as its custodian for all internally managed accounts. For a full list of custodial fees please refer to Appendix 1 (Custodial Fees)

Referrals to Third Party Money Managers

Third party money managers establish and maintain their own separate billing processes which we have no control over. In general, they will directly bill client and describe how this works in their separate written disclosure documents.

Ted Buchan & Company's compensation for managing assets is fee only. As a fee only firm, clients are never subject to sales charges, deferred sales charges, or commissions which are typically referred to as "loads" in industry jargon. If the firm is to buy a mutual fund managed by

Fidelity, American Funds, Vanguard or any mutual fund family, the firm is not paid any additional compensation. Therefore, there is no conflict of interest in whatever fund family is used.

Clients that are affiliated with the firm have the ability to purchase investment products wherever they choose.

Commissionable Sales

Ted Buchan & Company does not sell securities for a commission.

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

Ted Buchan & Company and its advisors do not accept performance-based fees.

Item 7: Types of Clients

Ted Buchan & Company provides investment advice to individuals and high-net worth individuals.

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

Ted Buchan & Company primarily uses mutual funds and exchange traded funds to design investment portfolios for their clients. Our investment process is based on an analytical and systematic approach that uses industry software and research to set up a client's portfolio and proactively monitor all of the investments. The software utilizes, but is not limited to, the following information: how long the manager has been managing the fund, the expenses paid to the manager, the risk the fund is taking and the performance of the fund compared to its peers over various time frames. The objective is to create an investment portfolio based on each client's individual needs, goals and risk tolerance. The client completes a Risk Tolerance Questionnaire, initially and on a tri-annual basis in order to determine their level of acceptable risk.

Item 9: Disciplinary Information

Ted Buchan & Company and its management have not been found guilty in any criminal or civil action. The firm and its management have not been subject to any proceedings before the SEC, any other federal agency, any state regulatory agency or any foreign regulatory authority. The firm and its management have not been subjected to a SRO proceeding.

Item 10: Other Financial Industry Activities and Affiliations

Ted Buchan & Company does have professional relationships with CPAs, Realtors, Mortgage Brokers, and Attorneys that, from time to time we refer existing clients to. However, we do not receive any type of compensation for these referrals.

Item 11: Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

Ted Buchan & Company is a state registered advisor with the State of California and Texas. The Code of Ethics ("Code") from Ted Buchan & Company is available upon request.

The Code is based on basic principles that should pervade all investment related activities of all employees, personal as well as professional:

- 1) Ted Buchan & Company Advisors are Fiduciaries and as such the Interest of the advisor's clients/investors come before the advisor's or any employees interest;
- 2) Each employee's professional activities and personal investment activities, must be consistent with this Code and avoid any actual or potential conflict between the interest of clients/investors and those of the advisor or the employee;
- 3) Those activities must be conducted in a way that avoids any abuse of an employee's position of trust with, and responsibility between, the advisor and their clients, including taking inappropriate advantage of that position.

Employees do have the flexibility to buy securities outside of the model portfolios in accordance with the Code.

Item 12: Brokerage Practices

Ted Buchan & Company investment portfolios are comprised of mutual and exchange traded funds. Shareholders Service Group was chosen as the broker-dealer for Ted Buchan & Company based on:

- Their competitive cost structure
- Niche toward working with similar sized firms as Ted Buchan & Company
- Presence in the San Diego area
- Proactive approach to providing their advisors with cutting edge technology
- The personal relationship that had been developed with the executive team at Shareholders Service Group.

Ted Buchan & Company does not recommend client execute transactions through a specific broker-dealer. Ted Buchan & Company does aggregate stock orders that take place when a change is made in a specific model portfolio for clients that have their accounts managed on a discretionary basis. Ted Buchan & Company does not aggregate stock orders when an individual client makes a customized change to their particular portfolio or for clients whose accounts are managed on a non-discretionary basis.

Item 13: Review of Accounts

A Ted Buchan & Company credentialed CFP advisor will review client's accounts either in person or by phone on a regular basis. The frequency of reviews is based on the client's assets under management, the client's request for reviews or any personal financial developments that may occur. Client reviews are performed in person or on the phone at least annually. Based on an individual client's particular situation, different aspects of their personal financial situation may be reviewed at any given time.

Ted Buchan & Company provides the client with a written performance report highlighting the performance of their accounts over a customized time period. A typical report may highlights the following areas:

- Summary of portfolio performance
- Portfolio performance vs respective benchmark indices
- Asset allocation

Item 14: Client Referrals & Other Compensation

Ted Buchan & Company does not pay referral fees (non-commission based) to independent solicitors (non-registered representatives) for the referral of their clients to our firm. Ted Buchan & Company does acknowledge client referrals from clients by sending them a thank you card and a small gift (i.e. a cake or flowers).

Item 15: Custody

Ted Buchan & Company does not have custody of clients' funds. The majority of Ted Buchan & Company client assets are held with Pershing.

State Securities Bureaus, or their equivalent, generally take the position that any arrangement under which a registered investment adviser is authorized or permitted to withdraw client funds or securities maintained with a custodian upon the adviser's instruction to the custodian, is deemed to have custody of client funds and securities.

As such, we have adopted the following safeguarding procedures:

1. Our clients must provide us with written authorization permitting direct payment to us of our advisory fees from the client's account(s), maintained by a custodian who is independent of our firm;
2. We must send a statement to our clients showing the amount of our fee, the value of their assets upon which our fee was based, and the specific manner in which our fee was calculated;
3. We must disclose to our clients that it is their responsibility to verify the accuracy of our fee calculation, and that the custodian will not determine whether the fee is properly calculated;

4. Your account custodian must agree to send you a statement, at least quarterly, showing all disbursements from your account, including advisory fees.

Item 16: Investment Discretion

Ted Buchan & Company does exercise discretionary authority. The client has the right to outline specific trading parameters within the discretionary account(s). Examples of this may include:

- A concentrated position
- A position with a large taxable gain
- An inherited position with sentimental value
- Comparative holdings performance vs. respective benchmark indices
- Stock options

Item 17: Voting Client Securities

Ted Buchan & Company does not, and will not, accept authority to vote client securities.

We encourage clients to vote their own proxies. Ted Buchan & Company clients receive all shareholder related materials from the custodian directly.

Item 18: Financial Information

Ted Buchan & Company does not require prepayment of fees from clients, six months or more in advance. Ted Buchan & Company does bill clients for assets under management quarterly, in advance.

None of the management of Ted Buchan & Company has been subject to a bankruptcy petition at any time during the past 10 years.

Item 19: Requirements for State-Registered Advisers

Edward (Ted) J. Buchan, CFP[®], AIF[®], CCFSTM

Born in 1971

Educational Background

- Bachelor's Degree in Business Administration (Finance Major), Emory University, 1993
- CFP[®], Certified Financial Planner, October 2001
- AIF[®], Accredited Investment Fiduciary, April 2010
- CCFSTM – Certified College Funding Specialist, June 2005

Business Background

- Ted Buchan & Company, President/Registered Investment Advisor, 09/2006 to Present
- AIG Financial Advisors, Independent Contractor/ CFP®, 10/2005 to 09/2006
- Spelman & Co, Inc., Financial Consultant, 07/2002 to 09/2006
- Wells Fargo Investments, LLC; Mass Transfer, 05/2001 to 06/2002
- Wells Fargo Bank, N.A, Wells Fargo Securities, Financial Consultant, 11/1999 to 05/2001
- Prudential Securities, Financial Advisor, 08/1996 to 09/1999

Certifications:

- **CFP®**, Certified Financial Planner, October 2001

This designation requires the candidate to take an approved educational program³ covering 89 topics defined by the CFP board. They must pass a comprehensive exam and complete additional tasks as outlined below

- ☛ You must hold a bachelor's degree or its equivalent in any discipline from an accredited college or university.
- ☛ You must have three years of relevant experience prior to being awarded the CFP® certification
- ☛ You must pass the Candidate Fitness Standards and background check

There is an annual requirement of 30 hours of continuing education in the finance industry by the advisor.

- **CCFS**, Certified College Funding Specialist, June 2005

This designation is solely offered through the ACCFS and is the nation's only professional education and certification program focused exclusively on college financial funding.

- **AIF®**, Accredited Investment Fiduciary, April 2010

This designation represents a thorough knowledge of and ability to apply the fiduciary practices to your firm. There is an annual requirement of 6 hours of approved AIF® continuing education by the advisor.

Eric V Schmid, CFP[®], AIF[®], CRTP, CCFS[™]

Born in 1972

Educational Background

- Bachelor's Degree in Engineering, Harvey Mudd College, 1995
- CFP[®], Certified Financial Planner, May 2015
- AIF[®], Accredited Investment Fiduciary, April 2013
- CCFS[™] – Certified College Funding Specialist, Dec 2011
- CRTP – California Registered Tax Preparer, May 2012

Business Background

- Ted Buchan & Company, Partner, Registered Investment Advisor, 1/2017 - Present
- Ted Buchan & Company, Consultant, 1/2012 – 12/2016
- REVA Medical, Vice President Advanced Technology, 12/2010 – 12/2011
- REVA Medical, Vice President Engineering & Stent Development, 2/2007 – 12/2010
- REVA Medical, Program Director / Principal Engineer, 9/2003 – 2/2007
- REVA Medical, Manager of Design & Development / Principal Engineer, 3/2001-9/2003
- Apex Medical Technologies, Senior Development Engineer, 6/1995 – 2/2001

Certifications:

- CFP[®], Certified Financial Planner, May 2015

This designation requires the candidate to take an approved educational program covering 89 topics defined by the CFP board. They must pass a comprehensive exam and complete additional tasks as outlined below

- You must hold a bachelor's degree or its equivalent in any discipline from an accredited college or university.
- You must have three years of relevant experience prior to being awarded the CFP[®] certification
- You must pass the Candidate Fitness Standards and background check

There is an annual requirement of 30 hours of continuing education in the finance

industry by the advisor.

- **CCFS**, Certified College Funding Specialist, Dec 2011

This designation is solely offered through the ACCFS and is the nation's only professional education and certification program focused exclusively on college financial funding.

- **AIF®**, Accredited Investment Fiduciary, April 2013

This designation represents a thorough knowledge of and ability to apply the fiduciary practices to your firm. There is an annual requirement of 6 hours of approved AIF® continuing education by the advisor.

- **CRTP**, California Registered Tax Preparer, May 2012

California law requires anyone who prepares or advises tax returns for a fee and is not an exempt preparer to register as a tax preparer with the California Tax Education Council (CTEC).

- Take a 60-hour qualifying education course from a CTEC approved provider within the past 18 months.
- Purchase a \$5,000 tax preparer bond from an insurance/surety agent.
- Obtain a Preparer Tax Identification Number (PTIN) from the Internal Revenue Service (IRS).
- Register and submit the \$33 registration fee online.

Annual requirement of 20 hours of continuing education

- A. Description of any business in which we are actively engaged (other than giving investment advice) and the approximate amount of time spent on that business.

Ted Buchan & Company does not engage in outside business activities. Our advisory representatives may participate in outside business activities. Please refer to their individual Form ADV Part 2B for more information.

- B. In addition to the description of our fees in response to Item 5 of Part 2A, if our firm or a supervised person is compensated for advisory services with performance-based fees, we must explain how these fees will be calculated.

We do not charge performance-based fees.

C. If our firm or a management person has been involved in one of the events listed below, we must disclose all material facts regarding the event.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - (a) An investment or an investment-related business or activity; (b) Fraud, false statement(s), or omissions;
 - (c) Theft, embezzlement, or other wrongful taking of property;
 - (d) Bribery, forgery, counterfeiting, or extortion; or
 - (e) Dishonest, unfair, or unethical practices.

We have not been involved in any of the above listed events.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - (a) An investment or an investment-related business or activity;
 - (b) Fraud, false statement(s), or omissions;
 - (c) Theft, embezzlement, or other wrongful taking of property;
 - (d) Bribery, forgery, counterfeiting, or extortion; or
 - (e) Dishonest, unfair, or unethical practices.

We have not been involved in any of the above listed events.

D. In addition to any relationship or arrangement described in response to Item 10.C. of Part 2A, we must describe any relationship or arrangement that our firm or any of our management persons have with any issuer of securities that is not listed in Item 10.C. of Part 2A.

We have nothing to disclose in this regard.

Appendix 1 Shareholders Service Group – Fee Schedule (effective 12/22/16)

Equity Trades as low as \$10.95*											
Advisory Firm E-delivery Adoption Rate	<65%	>65%	>80%	>95%							
Online Market Order	\$15.95	\$14.95	\$12.95	\$1							
\$.01 per share or above minimum rate- \$95 max (except foreign) Broker-assisted orders: \$35. Limit orders: add \$3 *With Electronic delivery of statements, confirms and Foreign Security Transaction Fees and Commissions vary by country.											
Bonds & Other Fixed Income											
Agency Trades	\$50 per bond trade										
Principal Trades	NTF (included in bond price / yield)										
Listed Bonds, UITs, ARPs, Treasuries at Auction	\$50										
CDs, New Issues	Fees vary by bank.. Add'l \$35 max. svc										
CDs, Secondary Market	\$50										
Options	Online	Broker-assisted									
Options	\$19.95 + \$1.25 /contract	\$35 + \$1.50 per contract									
Option Exercise	n/a	\$35 per assignment									
Fee Choice – Alternate Asset-based Trade Pricing Schedule											
Fee Range: 30 to 45 bps		Minimum: \$350 annually									
Margin Rate: Annualized rate based on average debit balance											
\$0 - 10,000	Broker Call +										
10,001 – 50,000	Broker Call +										
50,001 – 100,000	Broker Call +										
Over 100,000	Broker Call +										
Over 1,000,000	Broker Call +										
Broker Call: currently 2.50%. Subject to change. Hard-to-borrow short positions subject to surcharge based on market demand.											
Cash Management Products											
	Corestone Silver & Silver Plus	Corestone Gold & Platinum									
Annual Fee	Checkwriting-\$25 Checks plus Debit Card-\$50	Gold- \$100. Corp-\$150 Platinum-\$150 Corp-\$250									
Minimum to open	Silver-\$5,000 SilverPlus-\$5,000	Gold-\$10,000 Platinum-\$20,000									
Reorder checks	\$12.50	Gold-\$10, Platinum-									
Returned check/ACH	\$25	\$25									
Stop Payment	\$25	\$25									
Overnight Delivery Checks / Debit Card	\$20	\$20									
Retirement Accounts											
IRA annual fee- Accts over \$10,000	Free										
IRA annual fee- Accts under \$10,000	\$25 not										
QRP, SEP, 403b, Individual(k), 401k annual fee	\$50										
Roth IRA Conversion/Recharacterization	\$25										
Retirement acct termination fees	\$90										
Limited Partnership/ Private Investments											
Custody Fee per position /year-not prorated	\$60 reg'd/\$150										
Subscription/Redemption/Transfer/Rereg	\$85										
Unrecognized Income Filing	\$200										
New LP Document Legal Review	\$475										

Rates, fees and limits are subject to change.

Mutual Funds—Over 15,000 funds. 8,000 NTF funds available loaned without transaction fees Please see Mutual Fund Network Guide for NTF list, other costs, and disclosures.					
Mutual Fund Transaction Fees as low as \$15					
Advisory Firm E-delivery Adoption Rate	<65%	>65%	>80%		
Transaction Fee Funds—Online Order	\$25	\$20	\$15^		
Exchanges (Buy and Sell same day-same fund family)	\$25 (\$12.50 per side)				
Periodic (SRS) Non-NTF funds			\$5		
NTF Fund Minimums**	No-load and many Load NTF Funds		Load Funds		
Regular trades	2,500		5,000		
IRAs/QRPs	500		5,000		
Periodic (SRS) Purch/redm	100		2,500		
Broker-assisted orders: \$35. *Short-Term Redemption (STR) Fee on NTF funds: \$75 for shares purchased at SSG and sold in 3 months or less; STR for periodic redemptions held less than 3 months is \$5.50. **\$25 transaction fee applies on redemptions of load funds within 3 months of transfer-in **\$25 transaction fee applies on orders below NTF minimum. ^\$5,000 minimum purchase may apply. Fund minimums and SSG minimum may vary. ^RIA's may purchase most load funds under a load-waiver--See fund prospectus ^\$25 fee for these exceptions: Vanguard, DFA, Dodge&Cox, Pimco Instl, CGM, Fairholme, Aegis, Allianz Instl, Northeast Invstrs, Meridian, Alpine, New Alternatives, Loomis Instl, Colorado Bondshares, Sequoia, FPA Funds, Stratton, T Rowe Inst'l, American F-3, and other Instl Shs.					
Optional Services for Advisor's Firm					
Advisory Fee Prep Service	\$5 per acct per event min				
Cost basis - enhanced stmt	\$6 per acct per year				
Data Downloads	\$0 to 100 per mo				
Performance Report Basic/Extended	\$66/\$89 acct				
Statements/Confirms on CD	See periodic schedule				
Miscellaneous Account Fees					
Certificate / Legal Transfer / Rule 144	\$75				
Stop payment or Check/ACH returned	\$25				
Dividend Reinvestment on equities	25¢ per item				
Delivery to Transfer Agent	\$15				
Trade Correction, DK'd, Post settlement	\$20 per trade				
ESOP Exercise	\$100 plus transfer fees				
Foreign Ordinary Share Trfr, Settle, Rereg	\$50 to \$150, by				
Margin Extension	\$20				
Mutual Fund share class conversion	\$50				
Oversight Check Delivery	\$12				
Precious Metals Service	\$100 trade; 75 bp storage				
Paper Statements or Confirms	\$2 to \$3.50				
Safekeeping / Foreign Custody	\$2 per month				
Transfer Out ACAT/ Partial Transfer	\$75 per transfer				
Wire Fee	\$35 in USA/ \$50				
Corporate Reorg Items					
Voluntary	\$20				
Mandatory	No charge				
Physical delivery	\$50				
Rejected deposit	\$100				
LoanAdvance to 70% of account equity (Not available in all states)					
\$25,001 - \$500,000	Prime Rate plus .50%				
\$500,000-\$1 million	Prime Rate plus .40%				
\$1 million or more	Prime Rate plus .35%				