Item 1 – Cover Page

Part 2A of Form ADV: Firm Brochure
July 2020

D.R. Saur Financial, Inc.
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This Brochure provides information about the qualifications and business practices of D.R. Saur Financial, Inc. If you have any questions about the contents of this Brochure, please contact our Director of First Impressions at (214) 559-3944. 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.

D.R. Saur Financial, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about D.R. Saur Financial, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

This Item discusses only specific material changes that are made to the Brochure and provides clients with a summary of such changes. Our last annual update of our Brochure was 03/31/2019.

- Representatives of D.R. Saur Financial, Inc. have discontinued their representation of Kalos Capital.
- D.R. Saur Financial, Inc. is currently in the process of converting to SEC registration.
- TD Ameritrade, Inc. ("TD Ameritrade") recently eliminated transaction fees for U.S. listed equities and exchange traded funds.

You will receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We provide other ongoing disclosure information about material changes as necessary.

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

Our Brochure can be requested by contacting our Director of First Impressions at (214) 559-3944. Our Brochure is available on our web site www.drsaur.com.

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Item 4 – Advisory Business

Our firm is dedicated to providing individuals and other types of clients with a wide array of investment advisory services. Our firm is a corporation formed under the laws of the State of Texas in 1993 and has been in business as an investment adviser since 2012. Our firm is owned by Daniel Saur and Lisa Saur.

The purpose of this Brochure is to disclose the conflicts of interest associated with the investment transactions, compensation and any other matters related to investment decisions made by our firm or its representatives. As a fiduciary, it is our duty to act in the client's best interest. This is accomplished in part by knowing our client. Our firm has established a service-oriented advisory practice with open lines of communication for many different types of clients to help meet their financial goals while remaining sensitive to risk tolerance and time horizons. Working with clients to understand their investment objectives while educating them about our process facilitates the kind of working relationship we value.

Types of Advisory Services Offered:

Investment Management:

The portfolios we create for clients primarily consist of exchange traded funds ("ETFs") and mutual funds but could also include stocks, bonds, options, structured notes, and other public and private securities or investments at some point in the future. In our Investment Policy Statement ("IPS"), our clients indicate their preferred allocations and we allocate money according to their written instructions. We monitor these portfolios regularly. In our IPS, our clients also state information about their financial situation, investment objectives, and reasonable restrictions to be imposed upon the management of the account.

Our firm utilizes turn-key asset management platform(s) ("TAMP") services to aid in the implementation of investment portfolios designed by our firm as well as separately managed accounts ("SMA"). Our firm may use SMAs for some clients' portfolios. A separately managed account is a portfolio of individual securities managed by a professional asset management firm. Before utilizing the services of an SMA, we will ensure that they are properly licensed or registered. Our firm will not offer advice on any specific securities or other investments in connection with SMAs. We will provide initial due diligence on SMAs as well as ongoing reviews of their management of client accounts.

Our firm will contact clients from time to time in order to review their financial situation and objectives; communicate information to third party managers as warranted; and, assist the client in understanding and evaluating the services provided by the third-party manager. Clients will be expected to notify our firm of any changes in their financial situation, investment objectives, or account restrictions that could affect their financial standing.

Disclosure documentation is provided for these third-party managers when an account is opened. Third party managers have the authority and discretionary power to purchase and sell securities such as, but not limited to open and closed-end mutual funds, publicly traded real estate investment trusts (REITs), business development companies (BDCs), stocks, exchange traded funds (ETFs), bonds, CDs, structured securities, variable annuity sub-accounts, and other investments and marketable securities in the client's accounts at third party manager's sole discretion. The third-party manager has discretion to select the assets purchased or sold and the amounts purchased or sold. However, the Advisor may accommodate a request of the client to enter transactions for other securities not recommended by the Advisor or third-party manager. However, the Advisor or third-party manager does not have discretionary authority on these other securities, nor will the Advisor or third-party manager monitor them unless agreed to by Advisor or client in writing, nor will the Advisor or third-party manager charge a fee for allowing them to reside in the account. They can be maintained in the client's account for the client's convenience, record keeping purposes, and/or the broker-dealer's competitive rates. Advisor can also invest client assets in investments such as, but not limited to, non-traded REITs, business development companies (BDCs), oil and gas programs, limited partnerships, exempt securities, private bonds, managed futures, structured notes, other structured products, commodities, etc.

Financial Planning & Consulting:

Our firm provides a variety of standalone financial planning and consulting services to clients for the management of financial resources based upon an analysis of current situation, goals, and objectives. Financial planning services will typically involve preparing a financial plan or rendering a financial consultation for clients based on the client's financial goals and objectives. This planning or consulting may encompass Investment Planning, Retirement Planning, Estate Planning, Charitable Planning, Education Planning, Corporate and Personal Tax Planning, Cost Segregation Study, Corporate Structure, Real Estate Analysis, Mortgage/Debt Analysis, Insurance Analysis, Lines of Credit Evaluation, or Business and Personal Financial Planning.

Written financial plans or financial consultations rendered to clients usually include general recommendations for a course of activity or specific actions to be taken by the clients. Implementation of the recommendations will be at the discretion of the client. Our firm provides clients with a summary of their financial situation and observations for financial planning engagements. Financial consultations are not typically accompanied by a written summary of observations and recommendations, as the process is less formal than the planning service. Assuming that all the information and documents requested from the client are provided in a timely fashion, plans or consultations are completed promptly after the client signs a contract engaging our firm to do the work.

Tailoring of Advisory Services:

Our firm offers investment advice to our Investment Management clients. General investment advice will be offered to our Financial Planning & Consulting clients. Each Investment Management client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account.

Participation in Wrap Fee Programs:

Our firm does not offer or sponsor a wrap fee program.

Regulatory Assets Under Management:

As of December 31, 2019, D.R. Saur Financial, Inc.'s Registered Investment Advisor discretionary assets under management totaled $110,175,327.

Item 5 – Fees and Compensation

The Advisor is a registered investment advisor. When acting as investment advisor, Advisor generally works on a fee basis.

D.R. Saur Financial and its investment adviser representatives offer a variety of investment services and products that some clients utilize. Investment advisors seek to recommend well diversified portfolios for investors within the clients' targeted returns, risk tolerance, and personal preferences. The investment advisor will receive compensation differently depending on which products or services the clients ultimately choose to utilize. When a client uses fee-based asset management services, the advisor will receive fees. Since there are various ways the advisor could receive compensation, there could be a conflict of interest if the advisor was intentionally trying to create one particular type of income rather than another as his recommendation could conceivably be based on the type of income he wanted to receive rather than what is in the best interest of the client. Investment advisor representatives determine suitability based on the goals of the client. A conflict of interest is avoided as stated client investment objectives are compared to existing allocations or recommendations.

Investment Management:

Account Value	Layered-fee Schedule
$0-$1,000,000	1.00%
$1,000,001-$2,000,000	0.95%
$2,000,001-$3,000,000	0.90%
$3,000,0001 or more	0.85%

Fees to be assessed will be outlined in the advisory agreement and/or the client's Statement of Investment Selection ("SIS") to be signed by the Client. The fee shall be charged on and calculated as a percentage of the asset value of the account(s) on the last trading day of the previous calendar quarter, as determined by the applicable custodian in accordance with the fee schedule above. Managed asset accounts are billed on an account level and are irrespective of other client assets advised or managed by D.R. Saur Financial. At this time, our firm does not buy assets on margin. If we did, the market value of assets under management would include assets purchased on margin, which would be in addition to any margin interest being paid by the Client. Partial quarters will be pro-rated. Fees are generally not negotiable and will be deducted from client account(s). Adjustments will be made for deposits and withdrawals during the quarter. At this time, our firm does not offer direct invoicing.

The annual fee charged by third party managers, if applicable, are in addition to the fees assessed by our firm and will not exceed 0.50%--usually they are less than 0.30%. Therefore, clients may pay a maximum annual advisory fee of 1.50%. Our firm will debit fees for this service as laid out in the executed advisory agreement between the client and our firm or in the client's SIS [third party management fees and TAMP fees are detailed in the SIS only]. Third party managers establish and maintain their own separate billing processes over which we have no control. They will deduct the fee from Client account(s) and describe how this works in their separate written disclosure documents.

Clients understand the following:

a) The client's independent custodian sends or posts statements at least quarterly showing the market values for each security included in the Assets and all account disbursements, including the amount of the advisory fees paid to our firm;
b) Clients will provide authorization permitting our firm to be directly paid by these terms.

Financial Planning & Consulting:

The Advisor offers investment advice to people for money that is not under the investment supervisory services of Advisor at a rate of $400 per hour. For example, if a person wanted a retirement plan prepared or his company retirement plan options reviewed, the Advisor could offer these kinds of services at a rate of $400 per hour. The Advisor also quotes a flat fee for various services offered such as creating a financial plan or reviewing and recommending allocations for a retirement plan that the Advisor does not manage. The flat fee will not exceed $50,000. Advisor can offer or contract with other professionals to offer value add services to our clients for a monthly fee. If client utilizes services, contracts for these services will be created and signed by both Advisor and client.

When a client contracts with Advisor and they have existing securities or other assets, the Advisor could give recommendations on retaining or disposing of those assets on a fee basis. A client may wish to strategically exit assets which they transfer to Advisor. Advisor could also offer advice on other investments or financial tools such as insurance products from time to time.

Other Types of Fees & Expenses:

D.R. Saur Financial Inc.'s fees are exclusive of brokerage commissions, transaction fees, TAMP fees, and other related costs and expenses which shall be incurred by the client. TD Ameritrade, Inc. ("TD Ameritrade") does not charge transaction fees for U.S. listed equities and exchange traded funds. Some clients, from time to time, will incur one or more of the following charges imposed by custodians, brokers, third party investment managers and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to D.R. Saur Financial, Inc.'s fee, and D.R. Saur Financial, Inc. shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that D.R. Saur Financial, Inc. considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

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

D.R. Saur Financial, Inc. does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

D.R. Saur Financial, Inc. provides portfolio management services to individuals, high net worth individuals, pension and profit-sharing plans, corporations and other businesses.

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

D.R. Saur Financial, Inc. bases recommendations on clients' individual goals and risk comfort level. Portfolios ranging from fixed income to aggressive growth are available depending on the individual needs of a client. We invest equity in managed accounts using the academically and historically validated Modern Portfolio Theory. This enables us and our clients to look past the emotion and headlines of the day and stay focused on the end goal of financial success for our clients. We actively monitor our investment positions and control risk by using asset allocation. D.R. Saur Financial, Inc. does analysis on each portfolio used. Advisor studies factors such as historical or hypothetical performance and risk measurements. Advisor also seeks to have an understanding of each manager's strategy.

Methods of Analysis:

Modern Portfolio Theory ("MPT"): A mathematical framework for assembling a portfolio of assets such that the expected return is maximized for a given level of risk, defined as variance. Its key insight is that an asset's risk and return should not be assessed by itself, but by how it contributes to a portfolio's overall risk and return. MPT assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists that has better expected returns.

The risk, return, and correlation measures used by MPT are based on expected values, which means that they are mathematical statements about the future (the expected value of returns is explicit in the above equations, and implicit in the definitions of variance and covariance). In practice, investors must substitute predictions based on historical measurements of asset return and volatility for these values in the equations. Very often such expected values fail to take account of new circumstances that did not exist when the historical data were generated. Mathematical risk measurements are also useful only to the degree that they reflect investors' true concerns—there is no point minimizing a variable that nobody cares about in practice. MPT uses the mathematical concept of variance to quantify risk, and this might be justified under the assumption of elliptically distributed returns such as normally distributed returns, but for general return distributions other risk measures (like coherent risk measures) might better reflect investors' true preferences.

Third-Party Money Manager Analysis: The analysis of the experience, investment philosophies, and past performance of independent third-party investment managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. Analysis is completed by understanding the manager's underlying holdings, strategies, concentrations and leverage. A risk of investing with a third-party manager who has been successful in the past is that they may not be able to replicate that success in the future. In addition, as our firm does not control the underlying investments in a third-party manager's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as our firm does not control the manager's daily business and compliance operations, our firm may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Investment Strategies:

<u>Asset Allocation:</u> The implementation of an investment strategy that attempts to balance risk versus reward by adjusting the percentage of each asset in an investment portfolio according to the investor's risk tolerance, goals and investment time frame. Asset allocation is based on the principle that different assets perform differently in different market and economic conditions. A fundamental justification for asset allocation is the notion that different asset classes offer returns that are not perfectly correlated, hence diversification reduces the overall risk in terms of the variability of returns for a given level of expected return. Although risk is reduced as long as correlations are not perfect, it is typically forecast (wholly or in part) based on statistical relationships (like correlation and variance) that existed over some past period.

An asset class is a group of economic resources sharing similar characteristics, such as riskiness and return. There are many types of assets that may or may not be included in an asset allocation strategy. The "traditional" asset classes are stocks (value, dividend, growth, or sector-specific [or a "blend" of any two or more of the preceding]; large-cap versus mid-cap, small-cap or micro-cap; domestic, foreign [developed], emerging or frontier markets), bonds (fixed income securities more generally: investment-grade or junk [high-yield]; government or corporate; short-term, intermediate, long-term; domestic, foreign, emerging markets), and cash or cash equivalents. Allocation among these three provides a starting point. Usually included are hybrid instruments such as convertible bonds and preferred stocks, counting as a mixture of bonds and stocks. Other alternative assets that may be considered include: commodities: precious metals, nonferrous metals, agriculture, energy, others.; commercial or residential real estate (also REITs); collectibles such as art, coins, or stamps; insurance products (fixed or fixed-index annuities, catastrophe bonds, personal life insurance products, etc.); derivatives such as long-short or market neutral strategies, options, collateralized debt, and futures; foreign currency; venture capital; private equity; and/or distressed securities.

<u>Strategic Asset Allocation:</u> The primary goal of a strategic asset allocation is to create an asset mix that seeks to provide the optimal balance between expected risk and return for a long-term investment horizon. Generally speaking, strategic asset allocation strategies are agnostic to economic environments, i.e., they do not change their allocation postures relative to changing market or economic conditions.

<u>Long-Term Purchases:</u> Our firm may buy securities for client's account and hold them for a relatively long time (more than a year) in anticipation that the security's value will appreciate over a long horizon. The risk of this strategy is that our firm could miss out on potential short-term gains that could have been profitable to client's account, or it's possible that the security's value may decline in value.

Risk of Loss:

Investing in securities involves risk of loss that clients should be prepared to bear. While the stock market may increase and the account(s) could enjoy a gain, it is also possible that the stock market may decrease and the account(s) could suffer a loss. It is possible that Managers will not manage assets and/or perform as they did in the past. It is also possible that the companies which provide data to D.R. Saur Financial could provide incorrect information, and it is possible that D.R. Saur Financial could incorrectly interpret that data. Mutual funds, ETFs, separately managed accounts, managed futures, strategists, stocks, bonds, etc. are subject to market risks and there is no assurance or guarantee that the objectives of the portfolios will be achieved. Past performance is not necessarily indicative of future returns. It is important that clients understand the risks associated with investing in the stock market, and that their assets are appropriately diversified in investments. Clients are encouraged to ask our firm any questions regarding their risk tolerance.

Economic Risk: The prevailing economic environment is important to the health of all businesses. Some companies, however, are more sensitive to changes in the domestic or global economy than others. These types of companies are often referred to as cyclical businesses. Countries in which a large portion of businesses are in cyclical industries are thus also very economically sensitive and carry a higher amount of economic risk. If an investment is issued by a party located in a country that experiences wide swings from an economic standpoint or in situations where certain elements of an investment instrument are hinged on dealings in such countries, the investment instrument will generally be subject to a higher level of economic risk.

Equity (Stock) Market Risk: Common stocks are susceptible to general stock market fluctuations and, volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.

ETF & Mutual Fund Risk: When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities within the ETF or mutual fund. Clients could incur brokerage costs when purchasing ETFs.

Fixed Income Securities Risk: Typically, the values of fixed-income securities change inversely with prevailing interest rates. Therefore, a fundamental risk of fixed-income securities is interest rate risk, which is the risk that their value will generally decline as prevailing interest rates rise, which may cause your account value to likewise decrease, and vice versa. How specific fixed income securities may react to changes in interest rates will depend on the specific characteristics of each security. Fixed-income securities are also subject to credit risk, prepayment risk, valuation risk, and liquidity risk. Credit risk is the chance that a bond issuer will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of a bond to decline.

Inflation Risk: Inflation risk involves the concern that in the future, your investment or proceeds from your investment will not be worth what they are today. Throughout time, the prices of resources and end-user products generally increase and thus, the same general goods and products today will likely be more expensive in the future. The longer an investment is held, the greater the chance that the proceeds from that investment will be worth less in the future than what they are today. Said another way, a dollar tomorrow will likely get you less than what it can today.

Interest Rate Risk: Certain investments involve the payment of a fixed or variable rate of interest to the investment holder. Once an investor has acquired the investment or has acquired the rights to an investment that pays a particular rate (fixed or variable) of interest, changes in overall interest rates in the market will affect the value of the interest-paying investment(s) they hold. In general, changes in prevailing interest rates in the market will have an inverse relationship to the value of existing, interest paying investments. In other words, as interest rates move up, the value of an instrument paying a particular rate (fixed or variable) of interest will go down. The reverse is generally true as well.

Manager Risk: There is the possibility that security selection could cause your investments to underperform relative to benchmarks or other funds with a similar investment objective.

Item 9 – Disciplinary Information

There are no legal or disciplinary events that are material to the evaluation of our advisory business or the integrity of our management.

Item 10 – Other Financial Industry Activities and Affiliations

In addition to giving investment advice on securities as a registered investment advisor, Advisor is also an Insurance Agency. Some Reps are also licensed to sell insurance products. Reps, insurance agents, or other qualified employees sell products such as fixed and indexed annuities and other insurance products for a commission. These commissions are completely separate and distinct from investment advisory fees. Client is not obligated to use D.R. Saur Financial, Inc. or associated persons to purchase these products. The providers of these investment tools are numerous and change frequently as opportunities come and go.

D.R. Saur Financial, Inc. has relationships with institutions that refer clients to D.R. Saur Financial, Inc. in return for compensation. These institutions include other investment advisors, insurance agencies, banks and credit unions.

The above relationships do not create a material conflict of interest with clients.

Item 11 – Code of Ethics

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

D.R. Saur Financial, Inc. anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which D.R. Saur Financial, Inc. has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which D.R. Saur Financial, Inc., its affiliates and/or clients, directly or indirectly, have a position of interest. D.R. Saur Financial, Inc.'s employees and persons associated with D.R. Saur Financial, Inc. are required to follow D.R. Saur Financial, Inc.'s Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of D.R. Saur Financial, Inc. and its affiliates can trade for their own accounts in securities which are recommended to and/or purchased for D.R. Saur Financial, Inc.'s clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of D.R. Saur Financial, Inc. will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. In addition, the Code requires pre-clearance of some transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between D.R. Saur Financial, Inc. and its clients.

D.R. Saur Financial, Inc.'s clients or prospective clients can request a copy of the firm's Code of Ethics by contacting the Chief Compliance Officer.

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

Related persons of our firm may buy or sell securities for themselves at or about the same time they buy or sell the same securities for client accounts. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request. Further, our related persons will refrain from buying or selling the same securities prior to buying or selling for our clients in the same day unless included in a block trade.

Item 12 – Brokerage Practices

Since Advisor does not have discretion to choose the BD the client will use for investment supervisory accounts, clients must direct the Advisor to use a particular broker for all trades. By directing the use of a particular BD, the Advisor might not be able to negotiate commissions, obtain volume discounts, or achieve best execution. In addition, a disparity in commission charges could exist among clients.

The Advisor suggests BDs to his clients based on his experience with their services, the competitive nature of their fees, and availability with specific assets.

Advisor participates in the Institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services that include custody of securities, trade execution, clearance, and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the Program. (Please see the disclosure under Item 14 below.)

When trade errors occur, surplus cash in Advisor error account is contributed to charity. The designated charity is Gospel for Asia.

Item 13 – Review of Accounts

Advisor's internal investment committee meets to review investment supervisory account assets. Overall review of performance of supervisory accounts is performed quarterly. As of the date of this document, there are four attendees at the investment committee meeting: Daniel Saur, President, Investment Advisor; Michael Welch, Vice President, Investment Advisor; Matthew Wolfe, Investment Advisor; and Haley Richards, Director of Practice Administration. All investment decisions regarding the composition of the portfolios are made solely by the registered investment advisor representatives. Personal client situations or investment management changes might cause an unscheduled review of the client accounts.

Investment Supervisory Service clients are provided regular statements from their investment providers, often once per month though some investment providers send at different intervals. This statement reports the value of the accounts, securities, transactions made, and any fees charged.

Financial Planning clients do not receive reviews of their written plans unless they take action to schedule a financial consultation with us. Our firm does not provide ongoing services to financial planning clients, but are willing to meet with such clients upon their request to discuss updates to their plans, changes in their circumstances, etc. Financial Planning clients do not receive written or verbal updated reports regarding their financial plans unless they separately engage our firm for a post-financial plan meeting or update to their initial written financial plan.

Item 14 – Client Referrals and Other Compensation

D.R. Saur Financial, Inc. has relationships with institutions that refer clients to D.R. Saur Financial, Inc. in return for compensation. These institutions could include other investment advisors, insurance agencies, banks, and credit unions. D.R. Saur Financial, Inc. can share insurance commissions with insurance agencies. D.R. Saur Financial, Inc. can share fees with other registered investment advisors. D.R. Saur Financial, Inc. can share fees with banks and credit unions.

D.R. Saur Financial, Inc. may refer clients to other insurance agencies and receives a portion of commission if business is transacted. The above relationships do not create a material conflict of interest with clients.

As disclosed under Item 12 above, Advisor participates in TD Ameritrade's Institutional advisor program and Advisor often recommends TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Advisor's participation in the Program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research-related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third-party vendors. TD Ameritrade pays for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program could benefit Advisor but might not benefit its Client accounts. These products or services could assist Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and could indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

Advisor receives succession planning, practice valuation, and equity management services from third-party vendors through Advisor's participation in the TD Ameritrade Institutional Equity Management Program. In addition to meeting the minimum eligibility criteria for participation in the TD Ameritrade Institutional Equity Management Program, Advisor could have been selected to participate in the TD Ameritrade Institutional Equity Management Program based on the amount and potential profitability to TD Ameritrade of the assets in, and trades place for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of and unaffiliated with Advisor and there is no employee or agency relationship between TD Ameritrade and Advisor. TD Ameritrade has established the TD Ameritrade Institutional Equity Management Program as a means of assisting independent unaffiliated Advisors to grow and maintain their respective investment advisory business. TD Ameritrade does not supervise Advisor and has no responsibility for Advisor's management of client portfolios or Advisor's other advice or services to clients.

Advisor's participation in the TD Ameritrade Institutional Equity Management Program raises potential conflicts of interest. Advisor might encourage their clients to custody their assets at TD Ameritrade. Consequently, in order to participate in the TD Ameritrade Institutional Equity Management Program, Advisor could have an incentive to recommend to clients that the assets under management by Advisor be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. Advisor's participation in the TD Ameritrade Institutional Equity Management Program does not relieve the Advisor of the duty to seek best execution of trades for client accounts.

Item 15 – Custody

While our firm does not maintain physical custody of client assets (which are maintained by a qualified custodian, as discussed above), we are deemed to have custody of certain client assets if the client gives us the authority to transfer assets from their accounts. For example, a client may provide authorization to our firm to transfer money from their investment accounts to their bank account. All of our clients receive account statements directly from their qualified custodian(s) at least quarterly upon opening of an account. Clients should carefully review these statements. We encourage clients to raise any questions with us about the custody, safety or security of their assets and our custodial recommendations.

On February 21, 2017, the SEC issued a no-action letter ("Letter") with respect to Rule 206(4)-2 ("Custody Rule") under the Investment Advisers Act of 1940 ("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. As such, our firm has adopted the following safeguards in conjunction with our custodian:

- The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.

- The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
- The client has the ability to terminate or change the instruction to the client's qualified custodian.
- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16 – Investment Discretion

D.R. Saur Financial, Inc. usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold or the portfolio managers to be utilized. Such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

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

Investment guidelines and restrictions must be provided to D.R. Saur Financial, Inc. in writing.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, D.R. Saur Financial, Inc. does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. D.R. Saur Financial, Inc. could, from time to time, provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

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