



## FIRM BROCHURE - FORM ADV PART 2A

JERICHO FINANCIAL  
38-A COMMERCE PARK DRIVE  
WESTERVILLE, OH 43082  
614.948.0039  
INFO@JERICHOFINANCIALADVISORS.COM  
WWW.JERICHOFINANCIALADVISORS.COM

*This brochure provides information about the qualifications and business practices of Jericho Financial. If you have any questions about the contents of this brochure, please contact us at (614) 330-1905 or by email at [ryan@jerichofinancialadvisors.com](mailto:ryan@jerichofinancialadvisors.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.*

*Additional information about Jericho Financial is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Jericho Financial's CRD number is: 288801.*

VERSION DATE 10/12/2018



**JERICHO**  
FINANCIAL

**FORM ADV PART 2A  
FIRM BROCHURE**

**ITEM 2: MATERIAL CHANGES**

The material changes in this brochure from the last annual updating amendment of JERICHO Financial on January 30, 2018 are described below. Material changes relate to JERICHO Financials' policies, practices or conflicts of interests.

JERICHO Financial offers Selection of Other Advisers Fees. (Item 4.B. Items 5.A & 5.B, Item 8.B & 10.D)



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## FORM ADV PART 2A FIRM BROCHURE

### ITEM 4: ADVISORY BUSINESS

#### A. DESCRIPTION OF THE ADVISORY FIRM

Jericho Financial (hereinafter “JERICHO”) is a Limited Liability Partnership organized in the State of Ohio. The firm was formed in April 2017, and the principal owners are Ryan Bosler and Mark Faubel.

#### B. TYPES OF ADVISORY SERVICES

##### Portfolio Management Services

JERICHO offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. JERICHO creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

JERICHO evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. JERICHO will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

JERICHO seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of JERICHO’s economic, investment or other financial interests. To meet its fiduciary obligations, JERICHO attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, JERICHO’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is JERICHO’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

##### Pension Consulting Services

JERICHO offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options
- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker-dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.



## FORM ADV PART 2A FIRM BROCHURE

### Financial Planning

Financial plans and financial planning may include but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

### Services Limited to Specific Types of Investments

JERICHO generally limits its investment advice to mutual funds, fixed income securities, insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds and non-U.S. securities, although JERICHO primarily recommends equity growth. JERICHO may use other securities as well to help diversify a portfolio when applicable.

### Selection of Other Advisors

JERICHO may direct clients to third-party investment advisers. Before selecting other advisers for clients, JERICHO will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where JERICHO is recommending the adviser to clients.

## C. CLIENT TAILORED SERVICES AND CLIENT IMPOSED RESTRICTIONS

JERICHO offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent JERICHO from properly servicing the client account, or if the restrictions would require JERICHO to deviate from its standard suite of services, JERICHO reserves the right to end the relationship.

## D. WRAP FEE PROGRAMS

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. JERICHO does not participate in any wrap fee programs.

## E. ASSETS UNDER MANAGEMENT

JERICHO has the following assets under management:

DISCRETIONARY AMOUNTS:	NON-DISCRETIONARY AMOUNTS:	DATE CALCULATED
\$49,490,000	\$7,000,872	December 2017



**ITEM 5: FEES AND COMPENSATION**

**A. FEE SCHEDULE**

**Portfolio Management Fees**

TOTAL ASSETS UNDER MANAGEMENT	ANNUAL FEES
\$0 - \$1,000,000	1.00%
\$1,000,001 - \$3,000,000	0.90%
\$3,000,001 - \$5,000,000	0.80%
\$5,000,001 - And Up	0.65%

JERICHO uses the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable, and the final fee schedule is attached as Exhibit II of the Investment Advisory Agreement. Clients may terminate the agreement without penalty for a full refund of JERICHO's fees within five business days of signing the Investment Advisory Agreement. Thereafter, clients may terminate the Investment Advisory Agreement generally with 30 days' written notice.

**Pension Consulting Services Fees**

**Asset-Based Fees for Pension Consulting**

TOTAL ASSETS UNDER MANAGEMENT	ANNUAL FEES
\$0 - \$1,000,000	0.75%
\$1,000,001 - \$3,000,000	0.55%
\$3,000,001 - \$5,000,000	0.35%
\$5,000,001 - And Up	0.25%

JERICHO uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable, and the final fee schedule is attached as Exhibit II of the pension consulting agreement.

Clients may terminate the agreement without penalty for a full refund of JERICHO's fees within five business days of signing the Investment Advisory Agreement. Thereafter, clients may terminate the pension consulting agreement generally with 30 days' written notice. JERICHO uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.



## FORM ADV PART 2A FIRM BROCHURE

### Fixed Fees

The rate for creating client pension consulting plans is between \$1,200 and \$10,000. The final fee schedule will be attached as Exhibit II of the pension consulting agreement. This service may be canceled with 30 days' notice

### Hourly Fees

The hourly fee for these services is up to \$250. The final fee schedule will be attached as Exhibit II of the Investment Advisory Contract.

### Selection of Other Advisers Fees

JERICHO may direct clients to third-party investment advisers. JERICHO will be compensated via a fee share from the advisers to which it directs those clients. The fees shared are negotiable and will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

### Financial Planning Fees

#### Fixed Fees

The negotiated fixed rate for creating client financial plans is between \$500 and \$5,000.

#### Hourly Fees

The negotiated hourly fee for these services is up to \$250.

Clients may terminate the agreement without penalty, for full refund of JERICHO's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

## B. PAYMENT OF FEES

### Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis or may be invoiced and billed directly to the client on a monthly basis. Clients may select the method in which they are billed. Fees are paid in arrears.

For fees deducted directly from client accounts, in states that require it, JERICHO will:

- (A) possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- (B) send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends invoices to the client.
- (C) send the client a written invoice itemizing the fee upon or prior to fee deduction, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.





#### **Payment of Pension Consulting Fees**

Asset-based pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis or may be invoiced and billed directly to the client on a monthly basis. Clients may select the method in which they are billed. Fees are paid in arrears.

Fixed pension consulting fees are paid via check. These fees are paid in arrears upon completion.

Hourly pension consulting fees are paid in arrears upon completion.

#### **Payment of Selection of Other Advisors Fees**

Fees are paid either monthly or quarterly, either in advance or in arrears as agreed upon by client and the advisory firm.

Selection of Other Advisors Fees are withdrawn from client accounts. The custodian pays the selected Third-party manager the entire fee, then Third-party manager pays JERICHO their fee.

For fees deducted directly from client accounts, in states that require it, JERICHO will:

- (A) possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- (B) send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends invoices to the client.
- (C) send the client a written invoice itemizing the fee upon or prior to fee deduction, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

Fixed pension consulting fees are paid via check. These fees are paid in arrears upon completion.

Hourly pension consulting fees are paid in arrears upon completion.

#### **Payment of Financial Planning Fees**

Financial planning fees are paid via check and wire.

Fixed financial planning fees are paid in arrears upon completion.

Hourly financial planning fees are paid in arrears upon completion.

### **C. CLIENT RESPONSIBILITY FOR THIRD PARTY FEES**

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by JERICHO. Please see Item 12 of this brochure regarding broker-dealer/custodian.

### **D. PREPAYMENT OF FEES**

JERICHO collects its fees in arrears. It does not collect fees in advance.



## **E. OUTSIDE COMPENSATION FOR THE SALE OF SECURITIES TO CLIENTS**

Ryan Charles Bosler and Mark Charles Faubel are also insurance agents. In these roles, they accept compensation for the sale of investment products to JERICHO clients

### **1. This is a Conflict of Interest**

Supervised persons may accept compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds to JERICHO's clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of investment products for which the supervised persons receives compensation, JERICHO will document the conflict of interest in the client file and inform the client of the conflict of interest.

### **2. Clients Have the Option to Purchase Recommended Products From Other Brokers**

Clients always have the option to purchase JERICHO recommended products through other brokers or agents that are not affiliated with JERICHO.

### **3. Commissions are not JERICHO's primary source of compensation for advisory services**

Commissions are not JERICHO's primary source of compensation for advisory services.

### **4. Advisory Fees in Addition to Commissions or Markups**

Advisory fees that are charged to clients are not reduced to offset the commissions or markups on investment products recommended to clients.

## **ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

JERICHO does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **ITEM 7: TYPES OF CLIENTS**

JERICHO generally provides advisory services to the following types of clients:

- Individuals
- Families
- Investment Companies
- Pension and Profit-Sharing Plans

There is no account minimum for any of JERICHO's services.



**ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES, & RISK OF LOSS**

**A. METHODS OF ANALYSIS AND INVESTMENT STRATEGIES**

**Methods of Analysis**

JERICHO's methods of analysis include Cyclical analysis, Fundamental analysis, Modern portfolio theory, Quantitative analysis and Technical analysis.

**Cyclical analysis** involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

**Quantitative analysis** deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

**Technical analysis** involves the analysis of past market data; primarily price and volume

**Investment Strategies**

JERICHO uses long term trading and short term trading and selection of other advisors.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

**B. MATERIAL RISKS INVOLVED**

**Methods of Analysis**

**Cyclical analysis** assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Modern portfolio theory** 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 which has better expected returns.

**Quantitative analysis** investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

**Technical analysis** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always

### **Investment Strategies**

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long- term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Short term trading** risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

**Selection of Other Advisers:** Although JERICHO will seek to select only money managers who will invest clients' assets with the highest level of integrity, JERICHO's selection process cannot ensure that money managers will perform as desired and JERICHO will have no control over the day-to-day operations of any of its selected money managers. JERICHO would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulator breach or fraud. In monitoring and analyzing the third-party advisers, JERICHO uses benchmarking analysis, assessing whether the adviser's performance has met, exceeded, or fallen short of comparable benchmarks (e.g., Russell 2000, S&P 500, etc.), together with comparison against any stated benchmarks the adviser has set for itself.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **C. RISKS OF SPECIFIC SECURITIES UTILIZED**

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Non-U.S.** securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## ITEM 9: DISCIPLINARY INFORMATION

### A. CRIMINAL OR CIVIL ACTIONS

There are no criminal or civil actions to report.

### B. ADMINISTRATIVE PROCEEDINGS

There are no administrative proceedings to report.

### C. SELF-REGULATORY ORGANIZATION (SRO) PROCEEDINGS

There are no self-regulatory organization proceedings to report.



**ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

**A. REGISTRATION AS A BROKER/DEALER OR BROKER/DEALER REPRESENTATIVE**

Neither JERICHO nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

**B. REGISTRATION AS A FUTURES COMMISSION MERCHANT, COMMODITY POOL OPERATOR, OR A COMMODITY TRADING ADVISOR**

Neither JERICHO nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

**C. REGISTRATION RELATIONSHIPS MATERIAL TO THIS ADVISORY BUSINESS AND POSSIBLE CONFLICTS OF INTERESTS**

Ryan Charles Bosler is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. JERICHO always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of JERICHO in connection with such individual's activities outside of JERICHO.

Mark Charles Faubel is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. JERICHO always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of JERICHO in connection with such individual's activities outside of JERICHO.

Mark Charles Faubel provide tax preparation and tax filing services independently of JERICHO. These services will be offered to client of JERICHO. JERICHO always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any JERICHO representative in such individual's outside capacities.

**D. SELECTION OF OTHER ADVISERS OR MANAGERS AND HOW THIS ADVISER IS COMPENSATED FOR THOSE SELECTIONS**

JERICHO may direct clients to third-party investment advisers. JERICHO will be compensated via a fee share from the advisers to which it directs those clients. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that JERICHO has an incentive to direct clients to the third-party investment advisers that provide JERICHO with a larger fee split. JERICHO will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. JERICHO will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where JERICHO is recommending the adviser to clients.



**ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST  
IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

**A. CODE OF ETHICS**

JERICHO has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. JERICHO's Code of Ethics is available free upon request to any client or prospective client.

**B. RECOMMENDATIONS INVOLVING MATERIAL FINANCIAL INTERESTS**

JERICHO does not recommend that clients buy or sell any security in which a related person to JERICHO or JERICHO has a material financial interest.

**C. INVESTING PERSONAL MONEY IN THE SAME SECURITIES AS CLIENTS**

From time to time, representatives of JERICHO may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of JERICHO to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. JERICHO will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

**D. TRADING SECURITIES AT/AROUND THE SAME TIME AS CLIENTS' SECURITIES**

From time to time, representatives of JERICHO may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of JERICHO to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, JERICHO will never engage in trading that operates to the client's disadvantage if representatives of JERICHO buy or sell securities at or around the same time as clients.

**ITEM 12: BROKERAGE PRACTICES**

**A. FACTORS USED TO SELECT CUSTODIANS AND/OR BROKER/DEALERS**

Custodians/broker-dealers will be recommended based on JERICHO's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and JERICHO may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in JERICHO's research efforts. JERICHO will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker dealer/custodian.

JERICHO will require clients to use TD Ameritrade.



### **1. Research and Other Soft-Dollar Benefits**

While JERICHO has no formal soft dollars program in which soft dollars are used to pay for third party services, JERICHO may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions (“soft dollar benefits”). JERICHO may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client’s transactions paid for it, and JERICHO does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. JERICHO benefits by not having to produce or pay for the research, products or services, and JERICHO will have an incentive to recommend a broker dealer based on receiving research or services. Clients should be aware that JERICHO’s acceptance of soft dollar benefits may result in higher commissions charged to the client.

### **2. Brokerage for Client Referrals**

JERICHO receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### **3. Clients Directing Which Broker/Dealer/Custodian to Use**

JERICHO will require that clients use a specific broker-dealer to execute transactions. There is no conflict of interest, as the broker-dealer is not an affiliate or related person of JERICHO. By directing brokerage, JERICHO may be unable to achieve most favorable execution of client transactions which could cost clients money in trade execution. Not all advisers require or allow their clients to direct brokerage.

## **B. AGGREGATING (BLOCK) TRADING FOR MULTIPLE CLIENT ACCOUNTS**

If JERICHO buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, JERICHO would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. JERICHO would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

## **ITEM 13: REVIEW OF ACCOUNTS**

### **A. FREQUENCY AND NATURE OF PERIODIC REVIEWS AND WHO MAKES THOSE REVIEWS**

All client accounts for JERICHO’s advisory services provided on an ongoing basis are reviewed at least Monthly by Ryan Bosler, Chief Compliance Officer, with regard to clients’ respective investment policies and risk tolerance levels. All accounts at JERICHO are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Ryan Bosler, Chief Compliance Officer. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.





## **B. FACTORS THAT WILL TRIGGER A NON-PERIODIC REVIEW OF CLIENT ACCOUNTS**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, JERICHO's services will generally conclude upon delivery of the financial plan.

## **C. CONTENT AND FREQUENCY OF REGULAR REPORTS PROVIDED TO CLIENTS**

Each client of JERICHO's advisory services provided on an ongoing basis will receive a monthly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. JERICHO will also provide at least monthly a separate written statement to the client.

Each financial planning client will receive the financial plan upon completion.

### **ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION**

#### **A. ECONOMIC BENEFITS PROVIDED BY THIRD PARTIES FOR ADVICE RENDERED TO CLIENTS (INCLUDES SALES AWARDS OR OTHER PRIZES)**

JERICHO does not receive any economic benefit, directly or indirectly from any third party for advice rendered to JERICHO's clients.

#### **B. COMPENSATION TO NON – ADVISORY PERSONNEL FOR CLIENT REFERRALS**

JERICHO does not compensate any person for client referrals.

### **ITEM 15: CUSTODY**

When advisory fees are deducted directly from client accounts at client's custodian, JERICHO will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive quarterly account statements from the custodian and, in jurisdictions that require it, monthly billing invoices from JERICHO. Clients are urged to compare the account statements they received from custodian with any statements they received from JERICHO.

### **ITEM 16: INVESTMENT DISCRETION**

JERICHO provides discretionary and non-discretionary investment advisory services to clients. The advisory agreement established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, JERICHO generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.



**ITEM 17: VOTING CLIENT SECURITIES (PROXY VOTING)**

JERICHO will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

**ITEM 18: FINANCIAL INFORMATION**

**A. BALANCE SHEET**

JERICHO neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

**B. FINANCIAL CONDITIONS REASONABLY LIKELY TO IMPAIR ABILITY  
TO MEET CONTRACTUAL COMMITMENTS TO CLIENTS**

Neither JERICHO nor its management has any financial condition that is likely to reasonably impair JERICHO's ability to meet contractual commitments to clients.

**C. BANKRUPTCY PETITIONS IN PREVIOUS TEN YEARS**

JERICHO has not been the subject of a bankruptcy petition in the last ten years.

**ITEM 19: REQUIREMENTS FOR STATE REGISTERED ADVISERS**

**A. PRINCIPAL EXECUTIVE OFFICERS AND MANAGEMENT PERSONS;  
THEIR FORMAL EDUCATION AND BUSINESS BACKGROUND**

The education and business backgrounds of JERICHO's current management persons, Ryan Charles Bosler and Mark Charles Faubel, can be found on the Form ADV Part 2B brochure supplements for those individuals.

**B. OTHER BUSINESSES IN WHICH THIS ADVISORY FIRM OR ITS PERSONNEL  
ARE ENGAGED AND TIME SPENT ON THOSE (IF ANY)**

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

**C. CALCULATION OF PERFORMANCE-BASED FEES AND DEGREE OF RISK TO CLIENTS**

JERICHO does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

**D. MATERIAL DISCIPLINARY DISCLOSURES FOR MANAGEMENT PERSONS OF THIS FIRM**

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

**E. MATERIAL RELATIONSHIPS THAT MANAGEMENT PERSONS  
HAVE WITH ISSUERS OF SECURITIES (IF ANY)**

See Item 10.C and 11.B.