

**DIGIOVINE HNILO JORDAN + JOHNSON  
FINANCIAL ADVISORS LTD.**

**REGISTERED INVESTMENT ADVISOR**

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March 31, 2011  
(Revised November 15, 2011)

**PART 2A OF FORM ADV: Firm Brochure**

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**PRIVACY POLICY STATEMENT**

This brochure provides information about the qualifications and business practices of DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. If you have any questions about the contents of this brochure, please contact us at 630/420-1360 or jsorbel@dhjj.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. is an independent organization of investment advisors registered with the United States Securities and Exchange Commission. Registration of an investment adviser does not imply any level of skill or training.

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

## **Item 2 – Material Changes**

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure, dated July 1, 2011, is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further 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.

Currently, our Brochure may be requested by contacting Jennifer Sorbel, our Financial Advisors’ Administrator, at 630/420-1360 or [jsorbel@dhjj.com](mailto:jsorbel@dhjj.com). Our Brochure is also available on our web site, [www.dhjjfinancial.com](http://www.dhjjfinancial.com), also free of charge.

Additional information about DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. is also available via the SEC’s web site at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. who are registered, or are required to be registered, as investment adviser representatives of DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd.

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#### **Item 4 – Advisory Business**

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. is an SEC-registered investment adviser with its principal place of business located in Naperville, Illinois. DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. began conducting business in 1988.

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

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. offers the following advisory services to our clients:

#### **INVESTMENT SUPERVISORY SERVICES (“ISS”) INDIVIDUAL PORTFOLIO MANAGEMENT**

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

We manage these advisory accounts on a discretionary basis. Account supervision is guided by the client’s stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations.

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. manages individual portfolios which are held with an authorized custodian (Charles Schwab & Co.).

No load mutual funds, exchange-listed securities, certificates of deposit, corporate bonds, municipal bonds and U.S. Government securities will be purchased through the facilities of the Schwab Institutional division of Charles Schwab & Co., Inc. There may be transaction charges involved when purchasing or redeeming these securities.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

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

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. receives various fee waivers and discounts on proprietary software products from Charles Schwab & Co., Inc. The software enables DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. to access client accounts, to place securities transaction orders, to produce reports and to obtain real time quotes. The fees usually

charged for these support services have been waived. Thus, because of the receipt of these support services, DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. has a potential conflict of interest when recommending that clients use Charles Schwab & Co., Inc. for custody and transaction services.

As an investment advisory firm, DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. has a fiduciary and fundamental duty to seek best execution for client transactions. DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd., as a matter of policy and practice, seeks to obtain best execution for client transactions, i.e. seeking to obtain not necessarily the lowest commission but the best overall qualitative execution in the particular circumstances.

The aggregation or blocking of client transactions allows an adviser to execute transactions in a more timely, equitable, and efficient manner and seeks to reduce overall commission charges to clients. With respect to this issue, the policy of DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. is to aggregate client transactions where possible and when advantageous to clients. In these instances, clients participating in any aggregated transactions will receive an average share price and transaction costs (i.e., commissions and trading fees) will be determined on an account by account basis based on each client's account status at Charles Schwab & Co., Inc.

Each client's investment portfolio managed by DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. is reviewed quarterly with updates done as often as the client requests. Changes in the client's situation, tax laws, or the economy can trigger an update.

Reports to clients on their accounts are prepared after the close of the calendar quarter. Clients receive a detailed statement, which is produced by DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd., reflecting current portfolio holdings as well as transactions made within their accounts during the prior quarter. In addition, clients are sent all required statements, confirmations, and year-end tax reporting information by the custodian of the assets.

Discretionary authorization is given to DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. to execute trades in our clients' Schwab accounts.

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. disclaims proxy-voting authority in all investment management engagements.

## **FINANCIAL PLANNING**

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. provides financial planning services. Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service receive a written report which provides the client with a detailed financial plan designed to assist the client in achieving his or her financial goals and objectives.

In general, the financial plan can address any or all of the following areas:

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

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

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

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. To eliminate the potential for product sales bias, we have no affiliation with any broker-dealer or insurance company, sell no products and earn no commissions.

All recommendations are of a generic basis and will generally include advice regarding the following securities:

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

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

Typically the financial plan is presented to the client within two weeks of the contract date, provided that all information needed to prepare the financial plan has been promptly provided.

## **PUBLICATION OF PERIODICALS**

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. publishes a quarterly newsletter providing general information on various financial topics including, but not limited to, estate and retirement planning, market trends, etc. No specific investment recommendations are provided in this newsletter and the information provided does not purport to meet the objectives or needs of any individual. This newsletter is distributed free of charge to our advisory clients and associates.

## **EDUCATION AND BUSINESS STANDARDS**

The principals, managers and associates of DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. have received a college degree from an accredited college/university. The principals and managers of the firm have passed the academic requirements to become a Certified Public Accountant. Paul A. Minta (a principal), Terrence J. Cicero (a principal), John T. Miller (a principal), Camilla C. Corso (a manager), and Martin C. VanAcker (a manager) have passed the academic requirements to become Certified Financial Planners. Also, DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. will require ongoing participation in educational programs made available to investment professionals.

## **DECISION MAKERS**

The following individuals are either principal executive officers of DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. or provide investment supervisory services (“ISS”) or financial planning services to our clients:

Paul A. Minta (1962)

- Managing Principal, DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd.
- B.S. Accountancy, University of Illinois, Champaign-Urbana, IL
- Master of Accounting/Tax, University of Florida, Gainesville, FL
- Investment Adviser Representative
- Vice President, DiGiovine Hnilo Jordan + Johnson Ltd. Certified Public Accountants
- Certified Public Accountant
- Certified Financial Planner

Thomas J. Jordan (1954)

- President, DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd.
- B.S. Accountancy, Northern Illinois University, DeKalb, IL
- President, DiGiovine Hnilo Jordan + Johnson Ltd. Certified Public Accountants
- Certified Public Accountant
- Certified Valuation Analyst

Timothy O. Johnson (1954)

- Treasurer, DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd.
- B.S. Accountancy, Northern Illinois University, DeKalb, IL
- Treasurer, DiGiovine Hnilo Jordan + Johnson Ltd. Certified Public Accountants
- Certified Public Accountant

Kenneth J. Overholt (1957)

- Vice President, DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd.
- B.S. Accountancy and Business Administration, Illinois State University, Normal, IL
- Vice President, DiGiovine Hnilo Jordan + Johnson Ltd. Certified Public Accountants
- Certified Public Accountant

## **DECISION MAKERS (Continued)**

Edwin J. Brooks (1960)

- Vice President, DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd.
- B.S. Accountancy and Business Administration, Elmhurst College, Elmhurst, IL
- Vice President, DiGiovine Hnilo Jordan + Johnson Ltd. Certified Public Accountants
- Certified Public Accountant

Mary Ann Powers (1955)

- Secretary, DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd.
- B.S. Business Administration/Accounting, Northern Illinois University, DeKalb, IL
- Secretary, DiGiovine Hnilo Jordan + Johnson Ltd. Certified Public Accountants
- Certified Public Accountant

Rebecca L. Turner (1969)

- Vice President, DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd.
- Elmhurst College, Elmhurst, IL
- Vice President, DiGiovine Hnilo Jordan + Johnson Ltd. Certified Public Accountants
- Certified Public Accountant

Terrence J. Cicero (1975)

- B.S., B.A. Accountancy, Roosevelt University, Schaumburg, IL
- Master of Science in Taxation, DePaul University, Chicago, IL
- Investment Adviser Representative
- Certified Public Accountant
- Certified Financial Planner

John T. Miller (1961)

- B.S. Accountancy, Southern Illinois University, Carbondale, IL
- Investment Adviser Representative
- Certified Public Accountant
- Certified Financial Planner
- Certified Divorce Financial Analyst

Camilla C. Corso (1980)

- B.S. Accountancy, Illinois State University, Normal, IL
- Investment Adviser Representative
- Certified Public Accountant
- Certified Financial Planner
- Certified Divorce Financial Analyst

## DECISION MAKERS (Continued)

Martin C. VanAcker (1956)

- B.S., B.A. Accountancy, Northern Illinois University, Chicago, IL
- Master of Science in Taxation, DePaul University, Chicago, IL
- Investment Adviser Representative
- Certified Public Accountant
- Certified Financial Planner

Jennifer L. Sorbel (1974)

- Administrator, DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd.

## AMOUNT OF MANAGED ASSETS

As of 12/31/2010, we were actively managing \$101,686,613 of clients' assets on a discretionary basis.

### Item 5 - Fees and Compensation

#### INDIVIDUAL SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT FEES

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

<u>Assets Under Management</u>	<u>Annual Fee</u>
\$250,000 BUT LESS THAN \$500,000	1.50% (.0150)
\$500,000 BUT LESS THAN \$750,000	1.25% (.0125)
\$750,000 BUT LESS THAN \$1,000,000	1.00% (.0100)
\$1,000,000 OR MORE	.75% (.0075)

If the account balance falls below \$250,000, the annual management fee will be 1.75% of assets under management.

Fees may vary from the above schedule depending upon the extent of the services provided and the cost of such services.

Management fees are billed quarterly, in advance, at the beginning of each calendar quarter based upon the total market value of the client's account at the end of the previous quarter. Fees will be debited from the account in accordance with the client authorization in the Financial Planning Agreement. Fees are calculated on the basis of total market value of the client's account at the time the account is opened at DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. and quarterly thereafter based on the account valuation on the last business day of

the preceding quarter. Management fees on new accounts will be payable in advance for the remainder of the current quarter on a pro-rata basis. Collected but unearned management fees are refundable to the client on a pro-rata basis if the agreement is terminated.

A minimum of \$250,000 of assets under management is required for this service. This account size may be negotiable under certain circumstances. DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

All fees paid to DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. for investment supervisory services are separate from the fees and expenses charged to shareholders of mutual fund shares by the mutual funds and a complete explanation of these expenses charged by the mutual funds is contained in each mutual fund's prospectus. Clients are encouraged to read the fund prospectus.

**Limited Negotiability of Advisory Fees:** Although DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs will be considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets, related accounts, portfolio style, account composition, and reports, among other factors. The specific annual fee schedule will be identified in the contract between the adviser and each client.

We may group certain related client accounts for the purposes of achieving the minimum account size requirements and determining the annualized fee.

Discounts, not generally available to our advisory clients, may be offered to family members and friends of associated persons of our firm.

## **FINANCIAL PLANNING FEES**

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

Our financial planning fees are calculated and charged on an hourly basis, ranging from \$200 to \$260 per hour. Although the length of time it will take to provide a Financial Plan will depend on each client's personal situation, we will provide an estimate for the total hours at the start of the advisory relationship. Full disclosure of the fees and charges are made prior to providing the service and, in all cases, the fees are payable by the client after the consultation.

For written financial plans/correspondence, fees are negotiated with the client prior to the preparation of the written plan/correspondence and such fees are agreed upon by the written financial planning agreement. The agreed upon fee is payable 50% upon signing of the financial planning agreement, and 50% upon receipt of the written plan/correspondence.

If the client terminates the agreement within five (5) business days of signing, no fees will be charged. Thereafter, it will be pro-rated based on time and effort expended.

The agreement terminates upon receipt of the written correspondence or analysis by the client, or if no written correspondence or analysis is required, then the agreement terminates at the conclusion of the final conference.

***Financial Planning Fee Offset:*** DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. reserves the discretion to reduce or waive the hourly fee and/or the minimum fixed fee if a financial planning client chooses to engage us for our Investment Supervisory Services (“ISS”).

The client will be billed in arrears based on actual hours accrued.

## **PUBLICATION OF PERIODICALS OR NEWSLETTERS**

There is no fee for a subscription to our newsletters.

## **GENERAL INFORMATION**

***Termination of the Advisory Relationship:*** A client agreement may be canceled at any time, by either party, for any reason upon receipt of written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. In calculating a client’s reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period.

***Mutual Fund Fees:*** All fees paid to DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or exchange-traded funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

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

***Grandfathering of Fee Schedules and Minimum Account Requirements:*** Pre-existing advisory clients are subject to DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd.'s minimum account requirements and advisory fee schedules in effect at the time the client entered into the advisory relationship. Therefore, our firm's minimum account requirements and advisory fee schedules may differ among clients.

***ERISA Accounts:*** DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act (“ERISA”). As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees. Our investment recommendations are not limited to any specific product or service offered by any broker-dealer or insurance company. To eliminate the potential for product sales bias, we have no affiliation with any broker-dealer or insurance company, sell no products and earn no commissions. All recommendations are of a generic nature.

***Advisory Fees in General:*** Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

***Limited Prepayment of Fees:*** Under no circumstances do we require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

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

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. does not charge performance-based fees and does not participate in side-by-side management.

## **Item 7 - Types of Clients**

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals);
- High net worth individuals;
- Pension and profit sharing plans (other than plan participants);
- Corporations, partnerships, LLC’s, or other businesses, not listed above.

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

### **METHODS OF ANALYSIS**

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

***Fundamental Analysis:*** We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the security is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the security.

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

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

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

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

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

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

## **INVESTMENT STRATEGIES**

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

***Long-term purchases:*** We purchase securities with the idea of holding them in the client's account for a year or longer.

Typically, we employ this strategy when:

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

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

***Short-term purchases:*** When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase. We rarely utilize this strategy.

## **RISK OF LOSS**

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

### **Item 9 - Disciplinary Information**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

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

The seven shareholders of DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. are also shareholders in the accounting firm of DiGiovine Hnilo Jordan + Johnson Ltd., where they are individually licensed and practicing Certified Public Accountants providing accounting services for separate and typical compensation.

The shareholders of the accounting firm DiGiovine Hnilo Jordan + Johnson Ltd. typically recommend DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. to accounting clients in need of advisory services. Conversely, the shareholders of the advisory firm DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. typically recommend DiGiovine Hnilo Jordan + Johnson Ltd. to advisory clients in need of accounting services. Accounting services provided by DiGiovine Hnilo Jordan + Johnson Ltd. are separate and distinct from our advisory services, and are provided for separate and typical compensation. There are no referral fee arrangements between our firms for these recommendations. No DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. client is obligated to use DiGiovine Hnilo Jordan + Johnson Ltd. for any accounting services and conversely, no accounting client is obligated to use the advisory services

provided by us. DiGiovine Hnilo Jordan + Johnson Ltd.'s accounting services do not include the authority to sign checks or otherwise disburse funds on any of our advisory client's behalf.

Paul A. Minta, one of the shareholders, may spend as much as 5% of his time working in the accounting practice, while the other six shareholders spend 100% of their time working in the accounting practice.

Many of the clients of the advisory firm are also clients of the accounting firm.

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

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

The Code is designed to ensure that the high ethical standards long maintained by DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. continue to be applied. The purpose of this Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. The excellent name and reputation of our firm continues to be a direct reflection of the conduct of each employee.

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

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to [jsorbel@dhjj.com](mailto:jsorbel@dhjj.com), or by calling us at 630/420-1360.

***Prohibition Against Insider Trading:*** Trading securities while in possession of material, non-public information, or improperly communicating that information to others may expose DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. and its employees to stringent penalties. The rules contained in this Code apply to securities trading and information handling by supervised persons of DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. and their

immediate family members. With respect to insider trading, the general policy of DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. states that no supervised person may trade, either personally or on behalf of others, while in the possession of material, non-public information, nor may any personnel of DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. communicate material, non-public information to others in violation of the law.

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

Every supervised person shall provide initial and annual holdings reports and quarterly transaction reports to our firm's Chief Compliance Officer. The initial holdings report must be provided no later than 10 days after the person becomes a supervised person and must contain a listing of each reportable security (including the number of shares and principal amount) in which the supervised person had any direct or indirect beneficial interest ownership when the person became a supervised person. The annual holdings report must be provided by every supervised person no later than January 30 each year and must contain the same information required in the initial holding report as described above. The information submitted must be current as of a date no more than 45 days before the annual report is submitted. The quarterly transaction reports must be provided by every supervised person no later than 30 days after the end of each calendar quarter and must contain the details of every securities transaction that the supervised person entered into during the quarter in an investment account that the supervised person had any direct or indirect beneficial ownership.

Our firm's Chief Compliance Officer will monitor and review all reports required under the Code for compliance with DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd.'s policies regarding personal securities transactions and applicable rules and regulations governed by the Securities and Exchange Commission ("SEC").

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

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

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

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. and individuals associated with our firm are prohibited from engaging in principal transactions.

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. and individuals associated with our firm are prohibited from engaging in agency cross transactions.

**Protecting the Confidentiality of Client Information:** As a registered investment adviser, DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. and all supervised persons must comply with SEC Regulation S-P, which requires investment advisers to adopt policies and procedures to protect the “non-public personal information” of clients. DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect from our clients in connection with any of the services provided by DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. We do not disclose any non-public personal information about our clients or former clients to anyone, except as permitted by law.

## **Item 12 – Brokerage Practices**

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. receives various fee waivers and discounts on proprietary software products from Charles Schwab & Co., Inc. The software enables DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. to access client accounts, to place securities transaction orders, to produce reports and to obtain real time quotes. The fees usually charged for these support services have been waived. Thus, because of the receipt of these support services, DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. has a potential conflict of interest when recommending that clients use Charles Schwab & Co., Inc. for custody and transaction services.

For all discretionary clients, DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. requires these clients to provide us with written authority to determine the broker-dealer to use for client transactions and the commission costs that will be charged to these clients for these transactions.

As an investment advisory firm, DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. has a fiduciary and fundamental duty to seek best execution for client transactions. DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd., as a matter of policy and practice, seeks to obtain best

execution for client transactions, i.e. seeking to obtain not necessarily the lowest commission but the best overall qualitative execution in the particular circumstances.

The aggregation or blocking of client transactions allows an adviser to execute transactions in a more timely, equitable, and efficient manner and seeks to reduce overall commission charges to clients. With respect to this issue, the policy of DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. is to aggregate client transactions where possible and when advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts. In these instances, clients participating in any aggregated transactions will receive an average share price and transaction costs (i.e., commissions and trading fees) will be determined on an account by account basis based on each client's account status at Charles Schwab & Co., Inc.

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. will typically aggregate trades among clients whose accounts can be traded at a given broker, and generally will rotate or vary the order of brokers through which it places trades for clients on any particular day. DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd.'s block trading policy and procedures are as follows:

- 1) Transactions for any client account may not be aggregated for execution if the practice is prohibited by or inconsistent with the client's advisory agreement with DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd., or our firm's order allocation policy.
- 2) The trading desk in concert with the portfolio manager must determine that the purchase or sale of the particular security involved is appropriate for the client and consistent with the client's investment objectives and with any investment guidelines or restrictions applicable to the client's account.
- 3) The portfolio manager must reasonably believe that the order aggregation will benefit, and will enable DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. to seek best execution for each client participating in the aggregated order. This requires a good faith judgment at the time the order is placed for the execution. It does not mean that the determination made in advance of the transaction must always prove to have been correct in the light of a "20-20 hindsight" perspective. Best execution includes the duty to seek the best quality of execution, as well as the best net price.
- 4) Prior to entry of an aggregated order, a written order ticket must be completed which identifies each client account participating in the order and the proposed allocation of the order, upon completion, to those clients.
- 5) If the order cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated pro rata among the participating client accounts in accordance with the initial order ticket or other written statement of allocation. However, adjustments to this pro rata allocation may be made to participating client accounts in accordance with the initial order ticket or other written statement of allocation. Furthermore, adjustments to this pro rata allocation may be made to

avoid having odd amounts of shares held in any client account, or to avoid excessive ticket charges in smaller accounts.

- 6) Generally, each client that participates in the aggregated order must do so at the average price for all separate transactions made to fill the order, and must share in the commissions on a pro rata basis in proportion to the client's participation. Under the client's agreement with the custodian/broker, transaction costs (i.e., commissions and trading fees) may be based on the number of shares traded for each client. In other words, the transaction costs (i.e., commissions and trading fees) will be determined on an account by account basis based on each client's account status at Charles Schwab & Co., Inc.
- 7) If the order will be allocated in a manner other than that stated in the initial statement of allocation, a written explanation of the change must be provided to and approved by the Chief Compliance Officer no later than the morning following the execution of the aggregate trade.
- 8) DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd.'s client account records separately reflect, for each account in which the aggregated transaction occurred, the securities which are held by, and bought and sold for, that account.
- 9) Funds and securities for aggregated orders are clearly identified on DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd.'s records and to the broker-dealers or other intermediaries handling the transactions, by the appropriate account numbers for each participating client.
- 10) No client or account will be favored over another.

Clients of DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. are free to choose any broker they wish in order to implement the investment advice given by us. However, should the client choose to let DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. implement the advice, then no-load mutual funds, exchange-listed securities, certificates of deposit, corporate bonds, municipal bonds and U.S. Government securities will be purchased through the facilities of the Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker-dealer, member SIPC. Schwab will maintain custody of the client's assets and will effect trades for their brokerage accounts. There may be transaction charges involved when purchasing or redeeming securities in their Schwab brokerage accounts. Although we require clients establish accounts at Schwab in order for us to manage their investments, it is the client's decision to custody assets with Schwab. DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. is independently owned and operated and not affiliated with Schwab.

Schwab provides DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab Institutional. These services are not contingent upon our firm committing to Schwab any specific amount of business (assets in custody or trading

commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For our client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab Institutional also makes available to our firm other products and services that benefit DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. but may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our client accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist us in managing and administering our clients' accounts include software and other technology that:

- provide access to client account data (such as trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide research, pricing and other market data;
- facilitate payment of our fees from clients' accounts; and
- assist with back-office functions, recordkeeping and client reporting.

Schwab Institutional also offers other services intended to help us manage and further develop our business enterprise. These services may include:

- compliance, legal and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm. Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend or require that clients custody their assets at Schwab, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

## **Item 13 – Review of Accounts**

### **INVESTMENT SUPERVISORY SERVICES (“ISS”) INDIVIDUAL PORTFOLIO MANAGEMENT**

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

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

- Paul A. Minta, CFP, CPA (Principal)
- Terrence J. Cicero, CFP, CPA (Principal)
- John T. Miller, CFP, CPA, CDFIA (Principal)
- Camilla C. Corso, CFP, CPA, CDFIA (Manager)

**REPORTS:** In addition to the monthly statements and confirmations of transactions that clients receive from the custodian, we will provide quarterly reports to clients on their accounts after the close of the calendar quarter. These quarterly reports, which are produced by DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd., will summarize account performance while also reflecting current portfolio holdings and transactions made within their accounts during the prior quarter.

### **FINANCIAL PLANNING**

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

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

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

It is DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd.’s policy not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm.

It is DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd.’s policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

## **Item 15 – Custody**

We previously disclosed in the “Fees and Compensation” section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the custodian of our client’s accounts is advised of the amount of the fee to be deducted from that client’s account. Also during this billing process, our firm will prepare and send an invoice to each client showing how the investment management fee for that quarter was calculated. This invoice is just for the client’s records so that they will be aware of how their investment management fee for that quarter was calculated; they are instructed by our firm not to send us payment for this invoice as the fee was debited directly from their account. On at least a quarterly basis, although usually done monthly, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period. Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. does not have actual or constructive custody of client accounts.

## **Item 16 – Investment Discretion**

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client’s account without contacting the client prior to each trade to obtain the client’s permission.

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

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

Clients give us discretionary authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

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

As a matter of firm policy, DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. does not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for:

- 1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted; and

- 2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

Clients are responsible for instructing each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We may provide advice to clients regarding the clients' voting of proxies.

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

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. has **no negative financial circumstances** to report. Our firm has no financial commitment that impairs our ability to meet our contractual and fiduciary commitments to clients.

Under no circumstances do we require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement with this firm brochure.

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. has not been the subject of a bankruptcy petition at any time in its existence.

**DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd.  
184 Shuman Boulevard, Suite 200  
Naperville, Illinois 60563**

**“Privacy Policy Statement”**

DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services provided by DiGiovine Hnilo Jordan + Johnson Financial Advisors Ltd. We do not disclose any non-public personal information about our clients or former clients to anyone, except as permitted by law.

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

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