Part 2A of Form ADV: *Firm Brochure*

D.M. BRENNER, INC.
REGISTERED INVESTMENT ADVISOR
"Financial Planning ... *It's not always about money.*"

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April 30, 2018

This brochure provides information about the qualifications and business practices of D. M. Brenner, Inc. If you have any questions about the contents of this brochure, please contact us at (858) 345-1001 or david@dmbrenner.com. D.M. Brenner, Inc. is registered as an investment adviser with the California Department of Business Oversight. The information in this Brochure has not been approved or verified by any State Securities Authority. Registration with any State Securities Authority does not imply a certain level of skill or training.

Additional information about D. M. Brenner, Inc. also is available on the SEC's website at 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 1370881.

ITEM 1 COVER PAGE

Please refer to previous page.

ITEM 2 MATERIAL CHANGES

This Brochure dated April 30, 2018 is being amended with an update to the following. Please note that some of these changes were included as part of the Form ADV annual amendment:

Item 4 Advisory Business - to update the Firm's Assets under Management of $74,583,606.00 as of December 31, 2017 and to describe the Firm's addition of FTJ FundChoice's TAMP program to its list of available client investment programs.

Item 5 Fees and Compensation – updated to further describe the registered representative and insurance activities of management personnel and the Solicitation Agreement entered with Meeder Investment Management.

Item 8 Methods of Analysis, Investment Strategies, and Risk of Loss – updated and expanded to further describe risks of loss and general investment risks.

Item 10 Other Financial Industry Activities and Affiliations - updated to further describe the registered representative and insurance activities of management personnel and the Solicitation Agreement entered with Meeder Investment Management.

Item 14 Client Referrals and Other Compensation – updated to describe the Solicitation Agreement entered with Meeder Investment Management.

D.M. Brenner, Inc. ("DMB, Inc.", "We", "Our", "the Firm") encourages each client to read this Brochure carefully and to call us with any questions you might have. Our previous Brochure is dated March 30, 2018

Pursuant to state regulations, the Firm will ensure that clients receive a summary of any materials changes to this Brochure within 120 days of the close of the Firm's fiscal year end, along with an offer to provide the Brochure. For more information about the firm, please contact us at (858) 345-1001. Additionally, as the Firm experiences material changes in the future, we will send you a summary of our "Material Changes" under separate cover.

Additional information about DMB, Inc. and its Investment Adviser Representatives is also available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 3 TABLE OF CONTENTS PAGE

ITEM 4 ADVISORY BUSINESS

D. M. Brenner, Inc. (“DMB, Inc.”, “We”, “Our”, “the Firm”) is a state-registered investment adviser, registered with the State of California’s Department of Business Oversight (“DBO”), with its principal place of business located in Solana Beach, California. DMB, Inc. is organized as a Corporation under the laws of the State of California.

As described below, DMB, Inc. offers customized fee-based financial planning services to its clients, investment advisory services through the use of Third-Party Asset Management Programs (“TAMPs”), and qualified plan services to qualified plan sponsors. DMB, Inc. furnishes investment advice on a wide variety of matters (including matters not involving securities), based upon each client’s specific investment objectives, risk tolerance, investment time horizon, tax considerations and other information provided by the client.

The firm is wholly owned by David M. Brenner, CLU, ChFC. David M. Brenner started his career in the financial services industry in 1985 and began conducting business as a Registered Investment Adviser (“RIA”) in 1996.

TYPES OF ADVISORY SERVICES OFFERED

FINANCIAL PLANNING

DMB, Inc. provides comprehensive financial planning services. We evaluate a client's current financial status, their goals, attitudes about money and their life values to educate the client about their options and guide them in achieving their goals. By using currently known values and assumptions about future variables, we can model cash flows, asset values and withdrawal plans in a variety of scenarios. Clients engaging us for this service receive a written report which provides the client with a detailed financial plan designed to assist the client achieve his or her financial goals and objectives. Clients may also retain us to address a specific area of planning.

Financial plans 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 income tax and future tax liability.
- INVESTMENTS: We analyze investment alternatives and their effect on the client's portfolio.
- INSURANCE: We review existing policies to ensure proper coverage for life, health, disability and long-term care.
- RETIREMENT: We analyze current strategies and investment plans to help the client achieve his or her retirement goals.
- COLLEGE FUNDING: We analyze current college needs and help families develop a strategy to set aside funds for future college costs.
- DEATH & DISABILITY: We review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- ESTATE PLANNING: Working with the client's legal and tax advisors, we assist in developing strategies that achieve the client's financial goals beyond their life.

We gather required information through in-depth personal interviews. 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. As part of its financial planning services, DMB, Inc. may recommend the services of itself, and its advisory representatives to implement its recommendations. Clients are advised that a potential conflict of interest exists if DMB, Inc. recommends its own investment management services as part of a financial planning engagement. However, in all cases, DMB, Inc. and its advisory representatives will only make such recommendations if they believe them to be in the best interests of the client. Clients are free at all times to accept or reject any of the Firm's recommendations provided under a financial planning engagement and further retain the authority and discretion over all such implementation decisions.

Should a client decide to implement any recommendations contained in their financial plan, the client can, but is under no obligation to, utilize DMB, Inc.’s investment management services to implement those recommendations. Clients who wish to engage DMB, Inc. for non-discretionary investment management services may be required to enter into a separate written agreement with the Firm for such services, for which DMB, Inc. will be paid a separate fee based on assets under management as set forth under Item 5, below.

SELECTION AND MONITORING OF THIRD-PARTY ASSET MANAGEMENT PROGRAMS (TAMPs)

DMB, Inc. does not actively manage investments or custody assets. We provide investment advisory services to our clients solely through Third-Party Asset Management Programs (“TAMPs”) we have chosen based on our research and analysis of their processes.

We serve as the intermediary to the TAMP providers to assist the client in determining an appropriate asset allocation strategy based on discussions about the client’s risk tolerance and investment objectives. The firm also obtains important relevant and current information concerning the client's identity, occupation, and financial circumstances, among many other things, as part of our advisory and fiduciary responsibilities. Based on a client's individual circumstances and needs, we will assist the client in determining which investment strategy is appropriate for that client. Factors considered in making this determination, include account size, risk tolerance, and a client's investment experience, which are all discussed during our initial consultation with the client.

DMB, Inc. will meet with the client (in person or via phone) at least annually, or as determined by the client, to review the account. When necessary, we will suggest changes in the client's investment strategy to reflect any changes in the client's goals and attitudes. We will then implement changes to the investment strategy upon the approval of the client. Recommendations made by DMB, Inc. are our own, and are neither recommended nor approved by the TAMP providers. Should there be any material change in the client's personal and/or financial situation, we should be notified immediately to determine whether any review and/or revision of the client’s strategy are warranted. DMB, Inc.’s fees include those fees associated with allocating client assets to the designated TAMP program.

Currently, the TAMPs utilized by DMB Inc. include FTJ FundChoice (“FundChoice”) and SEI Private Trust Company (“SEI”).

At the time of engagement, clients will complete account opening paperwork, including DMB, Inc.’s standard RIA agreement, a separate agreement with either FundChoice or SEI, and a risk tolerance questionnaire, which will help DMB, Inc. in selecting an appropriate investment strategy for the client. Once the client has selected an investment strategy, FundChoice and/or SEI will manage the clients’ assets on a discretionary basis according to the client’s investment strategy and asset allocation.

DMB, Inc. will monitor the client’s account activity and performance and, if we determine that a particular TAMP provider is not providing sufficient management services to the client,or is not managing the client's portfolio in a manner consistent with the client's investment objectives, risk profile, and time horizon, we will suggest that the client contract with a different TAMP provider.

SEI

SEI provides standardized, holistic investment portfolios and asset allocation services utilized by DMB Inc. which are monitored by DMB, Inc. on an ongoing basis to ensure that the client's investment objectives and criteria are being met.

SEI works with DMB, Inc. to provide these asset allocation services and design portfolios according to the client's investment objectives. Because SEI is a manager of managers, SEI gives specific asset management assignments to third-party advisors who then perform the security selections. These advisors are monitored by SEI and changed in order to provide consistency and lower volatility. Custodial services for SEI clients are provided by SEI Private Trust Company, a wholly owned subsidiary of SEI. Clients should refer to the disclosure documents (Form ADV Part 2) provided by SEI for a full description of the services offered.

FTJ FUNDCHOICE

FundChoice provides two different service models:

1) A pre-approved strategy/model for each household or individual account. The investment strategist overseeing the pre-approved model/strategy will select the underlying funds and allocations and DMB, Inc. will serve as an intermediary to ensure that the strategist is meeting the client's investment objectives; and/or

2) DMB, Inc. will create portfolio overlays that are a standardized combination of investment strategists. Per client instructions, DMB, Inc. will have the ability to change the combination of strategists and allocations while the investment strategists will provide discretionary asset management over the underlying assets in each account.

Custodial services for FundChoice clients are provided by TD Ameritrade, Inc.

Clients should refer to the disclosure documents (Form ADV Part 2) provided by FundChoice for a full description of the services offered.

QUALIFIED PLAN SERVICES

DMB, Inc. provides consulting services to qualified plan sponsors. DMB Inc. will assist plan sponsors with designing the plans, choosing providers (investment management and recordkeeping), and monitoring the plans we have chosen. As the needs of the plan sponsor dictate, DMB, Inc. will meet with the plan sponsor (in person or via phone) at least annually, or as determined by the sponsor, to review the plan's performance.

Currently, the service providers utilized by DMB Inc. for qualified plan services are Lincoln Financial Group ("Lincoln") and Mutual of Omaha ("MofO"). Lincoln and MofO will provide turnkey record keeping to qualified plan sponsors in consultation with DMB, Inc.

All qualified plan services shall be in compliance with the applicable state and federal law(s). These services apply to accounts that are a pension or other employee benefit plan (a "Plan") governed by the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). When providing our Pension Consulting Services, we acknowledge that we are a fiduciary within the meaning of Section 3(21) of ERISA (but only with respect to those services request by the plan sponsor and memorialized in the client agreement).

WRAP FEE PROGRAMS

DMB, Inc. provides neither portfolio management services for, nor sponsors, any wrap fee programs, as that term is defined in the instructions to Form ADV. However, DMB, Inc. recommends third-party advisor who sponsor, organize, and/or administer wrap fee programs through their platform. The TAMP provider sponsoring this program will provide clients with a copy of the advisor's Wrap Fee Program Brochure (Appendix 1 to Part 2A), setting forth important information about the applicable program.

ADVISORY AGREEMENTS

Prior to engaging DMB, Inc. to provide investment advisory and/or financial planning services, the client will be required to enter into one or more written agreements with DMB, Inc. setting forth the terms and conditions under which DMB, Inc. shall render its services. DMB Inc. will provide a brochure and one or more brochure supplements to each client or prospective client prior to or contemporaneously with the execution of an investment advisory agreement. The terms and conditions under which the client shall engage a TAMP investment strategist or program sponsor will be set forth in a separate written agreement directly with the third-party advisor and/or program sponsor selected. The advisory relationship will continue until terminated by the client, DMB, Inc., or the sponsor/advisor, in accordance with the provisions of these agreements. A client agreement with DMB, Inc. may be canceled at any time, at the discretion of either party, for any reason upon receipt of **5** days written notice. 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.

MANAGED ASSET TOTAL

As of December 31, 2017, we have $74,583,606 of clients' assets in managed account programs on a non-discretionary basis.

ITEM 5 FEES AND COMPENSATION

FINANCIAL PLANNING FEES

As noted above, DMB, Inc. Financial Planning fees are 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 charged in one of two ways:

1. Annual retainer – For clients wishing to have ongoing advice and planning, we offer financial planning on an annual retainer, ranging from $2,500 to $15,000 per year. The amount of the retainer is based on the complexity of a client's financial situation and the amount of planning services provided. The client is billed quarterly in arrears. DMB, Inc. sends an invoice directly to the client shortly after the end of each calendar quarter.
2. Flat fee for one-time plan - The typical fee ranges from $1,000 to $5,000, depending on the specific topics covered and the complexity of the client's financial situation. We collect 50% of the fee at the completion of the data gathering phase and the balance at the delivery of the plan. Each client will receive an invoice for the initial payment and the remaining balance due.

DMB, Inc., in its sole discretion, can waive its minimum fee and/or charge a lesser financial planning services fee based upon certain criteria (e.g., non-profit clients, length of relationship, type of assets, dollar amounts of assets to be managed, related accounts, account composition). Pre-existing advisory clients are subject to DMB, Inc. minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. The household account minimum is $100,000, however, DMB, Inc. has the discretion and authority to waive the account minimum requirement on a case-by-case basis. Minimum account requirements will differ among clients.

INVESTMENT MANAGEMENT FEES

For clients who use DMB, Inc. as the investment intermediary to a TAMP program, DMB, Inc.'s fees are calculated and debited from the investment account on a monthly basis according to the following schedules:

For clients using SEI's services:

- SEI Schedule - Tiered
  - 1.00% on the first $500,000;
  - 0.75% on the next $500,000;
  - 0.50% on assets over $1,000,000

For clients using FundChoice services:

- FundChoice Schedule - Tiered
  - 1.25% on the first $500,000;
  - 1.00% on the next $500,000;

0.75% on assets over $1,000,000DMB, Inc.'s standard fee agreement allows for clients to household their accounts, which are tiered according to the fee schedules listed above. Clients can negotiate a set percentage fee on the value of the portfolio, and DMB, Inc. will negotiate, from time to time, a flat annual fee at the top tier to be applied to larger accounts and/or accounts or households that do not require significant planning services. DMB, Inc. always reserves the right to negotiate fees for accounts depending on the size and type of account, the investments in the account, and the services required.

DMB, Inc., in its sole discretion, can waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., non-profit clients, length of relationship, type of assets, dollar amounts of assets to be managed, related accounts, account composition). Pre-existing advisory clients are subject to DMB, Inc. minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. The household account minimum is $100,000, however, DMB, Inc. has the discretion and authority to waive the account minimum requirement on a case-by-case basis.

QUALIFIED PLAN SERVICES FEES

For qualified plan services, DMB, Inc. charges an advisory fee ranging from 0.5% – 1.00% of a participant's account. DMB, Inc.'s qualified plans services fees are assessed quarterly, in arrears, based upon the ending market value of the plan assets as of the last date of the prior quarter. Each client's applicable fees are negotiable and set forth in the applicable agreement pursuant to which DMB, Inc. manages the plan's account. The plan's record-keeper will be responsible for debiting DMB, Inc.'s fees.

Should the client begin receiving these services during a quarter, DMB, Inc.'s fee will be prorated based on the number of days such services were received during the quarter. Upon termination of the client's agreement, DMB, Inc. will refund any pre-paid, unearned fees, and any unpaid feels will be billed upon termination on a pro-rated basis.

OTHER FEES AND EXPENSES

Clients should understand that the advisory fees described in the sections above do not include certain charges imposed by third parties such as custodial fees, mutual fund fees and expenses, and fees charged by third party managers or program sponsors. Client assets will also be subject to transaction costs, retirement plan administration fees (if applicable), deferred sales charges on mutual funds initially deposited in the account, 12b-1 fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and/or other fees and taxes on brokerage accounts and securities transactions.

Client assets invested in mutual funds will be subject to certain fees and expenses imposed directly by mutual funds to their shareholders, which shall be described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the mutual fund also imposes sales charges, a client will pay initial or deferred sales or surrender charge, depending on the class of shares selected. Clients also will incur brokerage commissions and other execution costs charged by the custodian or executing broker-dealer in connection with transactions for a client's account. In addition, client assets invested with TAMPs recommended by DMB, Inc. will be subject to management fees charged by those third-party managers, as described in each manager's disclosure brochure, which are separate from and in addition to the advisory fees charged by DMB, Inc. SEI will specifically charge a separate platform or custody fee and a strategy fee (when applicable), which will be debited from the client account. For SEI's proprietary mutual fund models, SEI will not charge a platform or custody fee as the fund level expense ratio will cover all of SEI's charges. FundChoice will charge a platform fee of 22 basis points which is paid to the custodian for custody and trading fees. Additionally, some strategies will have strategist fees, which are debited from the account by FundChoice and paid to the investment strategist.

Part of the Fund Choice strategies charge a “wrap fee” under which an inclusive fee covers investment advisory services (including portfolio management or advice concerning the selection of other investment advisers), as well as brokerage, clearance, custody and administrative services. Selection of a “wrap fee” program may result in the payment of fees by clients in excess of the combined total of separate advisory fees and brokerage commissions for the execution of client transactions. In other programs, the account may be charged separately for such services. The amount of the fees, the services provided, the payment structure, termination provisions, and other aspects of each program are detailed and disclosed in the third-party investment advisor's disclosure brochure, the wrap program brochure (if applicable), or other applicable disclosure documents, and in the account opening documents.

In both cases, DMB, Inc.'s advisory fee is debited directly from the clients' account. DMB, Inc. does not pay fees to either SEI or FundChoice and we receive no compensation from either SEI or FundChoice.

Clients should further understand that the fees and expenses described above are separate from and in addition to the fees charged by DMB, Inc. Accordingly, the client should review the fees charged by any third-party managers, program sponsors, mutual funds the client's assets are invested, together with the fees charged by DMB, Inc., to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided. Clients should note that similar advisory services may (or may not) be available from other investment advisers for similar or lower fees.

COMMISSIONS AND OTHER COMPENSATION

Certain Investment Adviser Representatives ("IARs") of our firm are licensed as registered representatives and insurance agents of Fortune Financial Services, Inc. ("FFS") (CRD # 42150, SEC # 49727, INS LIC. # 0F13068), which is a broker-dealer and insurance agency registered with the SEC, SIPC and a member of the Financial Industry Regulatory Authority ("FINRA"). In these capacities, the IARs recommend certain investment and/or insurance products to advisory clients for which they receive separate compensation (i.e., commissions, 12b-1 fees and/or other sales-related forms of compensation). This presents a conflict of interest to the extent that these IARs recommend that a client invest in a security which results in a commission being paid to them. Clients are not under any obligation to implement any such recommendations and has sole discretion to choose any broker-dealer and/or insurance agency to implement, should the client decide to do so. DMB, Inc., at its sole discretion, will from time to time reduce or waive financial planning fees when compensation is earned from commissions on products related to the implementation of the financial plan.

DMB, Inc. has entered into a solicitor agreement with Meeder Investment Management, ("Meeder"), an SEC RIA who provides advisory services for a cash management program. Prior to making an investment with Meeder, each client will be furnished with a disclosure brochure for Meeder. Because DMB, Inc. and/or its advisory representatives receive compensation from Meeder for referring clients and because such compensation may differ depending on the individual agreement with Meeder, a conflict of interest exists in that DMB, Inc. and/or its advisory representatives have an incentive to recommend Meeder over others with less favorable compensation arrangements. To mitigate this conflict, the Firm discloses its existence to clients at the time of solicitation, mainly through the delivery of this Brochure and the solicitation disclosure document provided to each solicited client. Clients should be aware that lower fees for comparable services may be available from other sources.

ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

DMB, Inc. does not charge performance-based fees (i.e. fees calculated based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client). Consequently, DMB, Inc. does not engage in side-by-side management of accounts that are charged a performance-based fee and accounts that are charged another type of fee.

ITEM 7 TYPES OF CLIENTS

DMB, Inc. 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 or other businesses not listed above

ERISA Accounts*:* DMB, Inc. 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"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. 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, DMB, Inc. 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, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset DMB, Inc. advisory fees.

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:

TAMP Provider Analysis. We examine the experience, expertise, investment philosophies, and past performance of TAMP providers 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 monitor the TAMP provider's underlying holdings, strategies, concentrations and leverage as part of our overall periodic risk assessment. Additionally, as part of our due-diligence process, we survey the TAMP provider's compliance and business enterprise risks.

INVESTMENT STRATEGIES

We believe in asset allocation strategies based on Modern Portfolio Theory and subsequent academic studies that refine this model.

- Modern Portfolio Theory is a Nobel Prize winning strategy for constructing portfolios in order to maximize expected return for a given level of risk (variance).
- Asset Allocation is an investment strategy that aims to balance risk and reward by allocating assets among a variety of asset classes. At a high level, there are three main asset classes—equities (stocks), fixed income (bonds), and cash/cash equivalents—each of which has different risk and reward profiles/behaviors. Asset classes are often further divided into domestic and foreign investments, and equities are often divided into small, intermediate, and large capitalization. The general theory behind asset allocation is that each asset class will perform differently from the others in different market conditions. By diversifying a portfolio of investments among a wide range of asset classes, investors may seek to reduce the overall volatility and risk of a portfolio by avoiding overexposure to any one asset class during various market cycles. Asset allocation does not guarantee a profit or protect against loss.

We believe that a client's allocation should correspond to their investment time horizon and their tolerance for volatility.

We recognize that there is debate in the industry about the value of active versus passive management and that either approach may be appropriate depending on the client's attitudes about fees and performance.

RISK OF LOSS

Investing in securities involves risk of loss, including loss of principal that clients should be prepared to bear.

Below is a list of some of the material risks pertaining to investments recommended and/or made by DMB, Inc.:

- ***General Risk:*** 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.
- ***Third-Party Manager Risk***: A risk of investing with a third-party manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a third-party manager's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.
- ***Market Risk:*** The risk that investment returns will be affected by changes in the overall level of the stock market. When the stock market as a whole increases or decreases; virtually all stocks are affected to some degree.

- ***Equity Risk**:* Historically, the equity markets have moved in cycles, and the value of equity securities can fluctuate significantly from day-to-day. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments. The prices of securities issued by such companies can suffer a decline in response. These factors contribute to price volatility.

- ***Reinvestment Rate Risk:*** The risk incurred when an investment's income is reinvested at a lower rate than the rate that existed at the time the original investment was made. This risk is most prevalent when interest rates fall.

- ***Purchasing Power Risk (Inflation Risk):*** The risk that inflation will affect the return of an investment in real dollars. In other words, the amount of goods that one dollar will purchase decreases with time. Investments that have low returns, such as savings accounts, are not likely to keep up with inflation. Investments with fixed returns, such as bonds, will decrease in value because their purchasing value will decrease with inflation.

- ***Business Risk:*** The risk associated with a particular industry or firm. These are factors that affect the industry or firm, but do not affect the whole market. They include government regulations, management competency, or local or regional economic factors.

- ***Financial Risk:*** The risk associated with the mix of debt and equity used to finance a company. The greater the financial leverage, the greater the financial risk.

- ***Currency Risk (Exchange Rate Risk):*** The risk that a change in the value of a foreign currency relative to the U.S. dollar will negatively affect a U.S. investor's return.

- ***Foreign Risk*:** Investments in foreign securities pose special risks, including currency fluctuation and political risks, and such investments can be more volatile than that of a U.S. only investment. The risks are generally intensified for investments in emerging markets.

- ***Political and Legislative Risk:*** Companies face a complex set of laws and circumstances in each country in which they operate. The political and legal environment can change rapidly and without warning, with significant impact, especially for companies operating outside of the United States or those companies who conduct a substantial amount of their business outside of the United States.

- ***Inflation Risk:*** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

- ***Liquidity Risk:*** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

In general, cash equivalents provide liquidity with minimum income, and a return of principal with no capital appreciation. Cash equivalents are, however, subject to purchasing power risk.

The return of principal for bond funds and funds with significant underlying bond holdings is not guaranteed. Mutual fund shares are subject to the same interest rate, inflation and credit risks associated with the underlying bond holdings. Lower rated bonds are subject to greater fluctuations in value and risk of loss of income and principal than higher-rated bonds.

Equity investments are subject to greater volatility, thus providing a greater opportunity for capital gains, and a greater opportunity for capital losses. Equity investments typically offer little or no current income. Equity investments are subject to market risk and interest rate risk, while providing an opportunity to protect against purchasing power risk. Also, stock mutual funds, rather than individual equities, may limit the exposure to business risk and financial risk.

Mutual funds and ETFs carry risks associated with their underlining investments, which are described in each fund's prospectus and statement of additional information and should be read carefully.

Different types of investments involve varying degrees of risk, and the client should not assume that future performance of any specific investment or investment strategy (including the investment products, insurance products, and/or investment strategies recommended by DMB, Inc.) will be profitable or equal to any specific performance level(s).

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

As mentioned in Item 5 above, certain IARs of our firm are licensed as registered representatives and insurance agents with Fortune Financial Services, Inc. ("FFS", CRD # 42150, SEC # 49727, INS LIC. # 0F13068) which is a broker-dealer and insurance agency registered with the SEC, SIPC and a member of the Financial Industry Regulatory Authority ("FINRA"). In these capacities, the IARs recommend certain investment and/or insurance products to advisory clients for which they receive separate compensation (i.e., commissions, 12b-1 fees and/or other sales-related forms of compensation). This presents a conflict of interest to the extent that these IARs recommend that a client invest in a security which results in a commission being paid to them. Clients are not under any obligation to implement any such recommendations and has sole discretion to choose any broker-dealer and/or insurance agency to implement, should the client decide to do so.

DMB, Inc. has entered into a solicitor agreement for a cash management program with Meeder Investment Management, Inc. ("Meeder"), an SEC RIA who provide investment advisory services. Prior to making an investment with Meeder, each client will be furnished with a disclosure brochure for Meeder. Because DMB, Inc. and/or its advisory representatives receive compensation from Meeder for referring clients and because such compensation may differ depending on the individual agreement with Meeder, a conflict of interest exists in that DMB, Inc. and/or its advisory representatives have an incentive to recommend Meeder over others with less favorable compensation arrangements. To mitigate this conflict, the Firm discloses its existence to clients at the time of solicitation, mainly through the delivery of this Brochure and the solicitation disclosure document. Clients should be aware that lower fees for comparable services may be available from other sources. Clients, however, are not under any obligation to engage these individuals when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client. Please refer to Item 5 for information on these fees and how DMB, Inc. addresses the applicable conflicts.

While DMB, Inc. and these individuals endeavor to always put the interest of the clients first as part of our fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of interest and may affect the judgment of these individuals when making recommendations.

Clients should be aware that the receipt of additional compensation by DMB, Inc. and its management persons or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. DMB, Inc. endeavors to always put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps to address this conflict:

- we disclose to clients the existence of all material conflicts of interest, including the potential for our firm and our employees to earn compensation from advisory clients in addition to our firm's advisory fees;
- we disclose to clients that they are not obligated to purchase recommended investment products from our employees or affiliated companies;
- we collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- our firm conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;

- we require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- we periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
- we educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

DMB, Inc. and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

DMB, Inc. Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

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 david@dmbrenner.com, or by calling us at 858-345-1001.

DMB, Inc. and individuals associated with our firm are prohibited from engaging in principal transactions.

DMB, Inc. and individuals associated with our firm are prohibited from engaging in agency cross transactions.

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 certain securities 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.

As disclosed in the preceding section of this Brochure (Item 10), related persons of our firm are separately registered as *licensed as an insurance agent/broker of various insurance companies.* Please refer to Item 10 for a detailed explanation of these relationships and important conflict of interest disclosures.

ITEM 12 BROKERAGE PRACTICES

Investment advisers that select or recommend broker-dealers for client transactions are required to disclose their practices. Because DMB, Inc. does not select or recommend broker-dealers for client transactions or place any client transactions, it has no information to disclose with respect to this Item.

Since trading is performed through FundChoice and SEI, clients should review the Form ADV disclosure brochure of FundChoice and SEI for information pertaining to the brokerage practices of each.

ITEM 13 REVIEW OF ACCOUNTS

SELECTION AND MONITORING OF TAMP PROVIDERS

REVIEWS: DMB, Inc. will review individual accounts at least annually, or sooner, if requested by a client due to a “triggering” or “life” event.

We will review the TAMP provider’s performance at least quarterly, or sooner if conditions necessitate.

Conditions that may trigger more frequent reviews can include changes in tax laws, new investment information, or when the overall markets drop by more than 10%.

REPORTS: Investment advisory clients will receive monthly/quarterly statements from the TAMP custodians directly. Clients should review the custodian’s statements at least quarterly and notify the adviser of any questions or errors.

Investment advisory clients should refer to the TAMP provider’s Firm Brochure for information regarding the nature and frequency of reports provided by the TAMP provider.

FINANCIAL PLANNING SERVICES

REVIEWS: While reviews may occur at different stages depending on the nature and terms of the specific engagement, DMB, Inc. does not typically conduct formal reviews for Financial Planning clients unless otherwise contracted for them. Financial planning clients may receive an updated financial plan after they have been with the firm for some period of time or as their life circumstances have changed.

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 DMB, Inc. policy not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm.

As mentioned above, DMB, Inc. has entered into a solicitor agreement with Meeder Investment Management, Inc. ("Meeder"), an SEC registered investment adviser, which provides services for a cash management program. Clients who chose to engage with Meeder will sign a cash management agreement, new account information, W-9, Huntington online agreement form, and provide copies of their driver licenses front and back to Meeder Investment Management to open an account. Meeder Investment Management custodies client assets with Huntington Investment Company. Prior to making an investment with Meeder, each client will be furnished with a disclosure brochure for Meeder. Because DMB, Inc. and/or its advisory representatives receive compensation from Meeder for referring clients and because such compensation may differ depending on the individual agreement with Meeder, a conflict of interest exists in that DMB, Inc. and/or its advisory representatives have an incentive to recommend Meeder over others with less favorable compensation arrangements. Please refer to Item 5 for information on these fees and how DMB, Inc. addresses the applicable conflicts.

ITEM 15 CUSTODY

DMB, Inc. is deemed to have custody of client funds because the Firm has the authority and ability to debit its fees directly from clients' accounts. Please note that DMB, Inc. does not have physical custody of client assets. To mitigate any potential conflicts of interests, all DMB, Inc. client account assets will be maintained with an independent qualified custodian.

The Firm may only implement its investment management recommendations after the client has arranged for and furnished DMB, Inc. with all information and authorization regarding its accounts held at the designated qualified custodian.

Clients will receive statements on at least a quarterly basis directly from the qualified custodian that holds and maintains their assets. Clients are urged to carefully review all custodial statements. Please contact DMB, Inc. with any questions.

If funds or securities are inadvertently received by DMB, Inc., they are returned to the sender immediately or as soon as practical.

ITEM 16 INVESTMENT DISCRETION

The advisory services provided by our firm do not include managing client assets. Accordingly, we do not accept investment discretionary authority, nor will we manage client accounts on a non-discretionary basis.

ITEM 17 VOTING CLIENT SECURITIES

As a matter of firm policy, we do 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 do not offer any consulting assistance regarding proxy issues to clients.

ITEM 18 FINANCIAL INFORMATION

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. DMB, Inc. has no additional financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of $500 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

DMB, Inc. has not been the subject of a bankruptcy petition at any time during the past ten years.

ITEM 19 REQUIREMENTS FOR STATE-REGISTERED ADVISERS

A. Principal Executive Officer

David M. Brenner

Year of Birth: 1963

Education: Muhlenberg College; BA, Business; 1985

B. Outside Business Activity

Investment-Related Activities – David M. Brenner is also engaged in the following investment-related activities:

1. Registered representative of a broker-dealer David M. Brenner is a Registered Representative with Fortune Financial Services, Inc. (“FFS”, CRD # 42150, SEC # 49727). In such a capacity, he recommends certain investment products through FFS and receives normal and customary commissions as a result of such purchases and sales. This presents a conflict of interest to the extent that he recommends that a client invest in an investment product which results in a commission being paid to him. To mitigate this conflict, the Firm discloses its existence to clients at the time of solicitation, mainly through the delivery of this Brochure and the solicitation disclosure document. Clients should be aware that lower fees for comparable services may be available from other sources. Clients, however, are not under any obligation to engage these individuals when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client.

2. David M. Brenner is a licensed insurance agent (INS. LIC. # 0801900) through FFS (INS LIC. # 0F13068) and numerous insurance companies. In such a capacity, he recommends insurance products and receives normal and customary commissions as a result of such a purchase. This presents a conflict of interest to the extent that he recommends the purchase of an insurance product which results in a commission being paid to him as an insurance agent. David M. Brenner receives commissions on the sale of securities, insurance or other investment products for services related to the implementation of financial planning recommendations. In every situation, the client’s needs are considered first and recommendations are made without regard to additional compensation. To mitigate this conflict, the Firm discloses its existence to clients at the time of solicitation, mainly through the delivery of this Brochure and the solicitation disclosure document. Clients should be aware that lower fees for comparable services may be available from other sources. Clients, however, are not under any obligation to engage these individuals when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client.

Non-Investment-Related Activities – David M. Brenner is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

For additional information, please refer to Item 10 above.

C. Performance-based Fees

As noted in response to Item 6 above, the Firm does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). The Firm provides advisory services for hourly fees, fixed fees, or fees based on a percentage of assets under management, depending on the specific type of services to be provided. Please refer to Item 5 for additional information about the Firm's fees and compensation.

D. Disclosure Events

1. David M. Brenner has not been found liable in an arbitration claim alleging damages in excess of $2,500, involving any of the following: (a) an investment or an investment-related business or activity; (b) fraud, false statement(s), or omissions; (c) theft, embezzlement, or other wrongful taking of property; (d) bribery, forgery, counterfeiting, or extortion; or (e) dishonest, unfair, or unethical practices.

2. David M. Brenner has not been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following: (a) an investment or an investment-related business or activity; (b) fraud, false statement(s), or omissions; (c) theft, embezzlement, or other wrongful taking of property; (d) bribery, forgery, counterfeiting, or extortion; or (e) dishonest, unfair, or unethical practices.

E. Relationship or Arrangement with Any Issuer of Securities

Neither DMB, Inc. nor any of its management persons have any relationships or arrangements with any issuer of securities.

F. Disclosure of Material Conflicts of Interest

All material conflicts of interest under CCR Section 260.238(k) have been disclosed about DMB, Inc., its representatives and employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Part 2B of Form ADV: *Brochure Supplement*

D.M. BRENNER, INC.
REGISTERED INVESTMENT ADVISOR

"Financial Planning ... *It's not always about money.*"

380 STEVENS AVENUE, SUITE 213, SOLANA BEACH, CA 92075

David M. Brenner, ChFC, CLU®

CRD # 1370881

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Web Address: www.dmbrenner.com

April 30, 2018

This brochure supplement provides information about David M. Brenner that supplements the D. M. Brenner, Inc. brochure. You should have received a copy of that brochure. Please contact David M. Brenner at (858) 345-1001 if you did not receive D. M. Brenner, Inc.'s ADV brochure or if you have any questions about the contents of this supplement.

Additional information about David M. Brenner is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 1 COVER PAGE

Please refer to previous page.

ITEM 2 EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

EDUCATION

- Muhlenberg College; BA, Business; 1985

BUSINESS EXPERIENCE

- D.M. Brenner, Inc. (and its predecessors) - Owner, President, CCO; from Jan.,1985 to Present
    - David M. Brenner – 1985-1993
    - David Brenner & Associates (RIA) 1993-2004
    - Navigator Advisory Services, Inc. (RIA) 2004-2010
    - D.M. Brenner & Associates (RIA) - 2010-2012
    - D.M. Brenner, Inc.(RIA) - 2013-present
- Broker/Dealer and Agency affiliations
    - Fortune Financial Services, Inc.; Registered Representative; from 05/2013 to Present
    - SCF Securities, Inc.; Registered Representative; from 08/2011 to 05/2013
    - Linsco Private Ledger; Registered Representative; from 05/1999 to 08/2011
    - John Hancock; Agent/Registered Representative; from 1991 to 04/1999
    - Penn Mutual; Agent/Registered Representative; from 1985 to 1991

DESIGNATIONS

David M. Brenner has earned the following designation(s) and is in good standing with the granting authority:

ChFC; The American College; 1988

The ChFC program is administered by the American College, Bryn Mawr, Pennsylvania. The designation has the same core curriculum as the CFP designation, plus two or three additional elective courses that focus on various areas of personal financial planning, including income tax, insurance, investment and estate planning. Candidates are required to have a minimum of three (3) years' experience in a financial industry position.

CLU®; The American College; 1995

The CLU® professional designee must successfully complete all 12 program courses; have at least three years of full-time business experience or alternative educational requirements; maintain continuing education requirements and ongoing ethics standards; as well as agree to comply with The American College Code of Ethics and Procedures.

ITEM 3 DISCIPLINARY INFORMATION

David M. Brenner has no reportable disciplinary history.

ITEM 4 OTHER BUSINESS ACTIVITIES

INVESTMENT-RELATED ACTIVITIES

David M. Brenner is also engaged in the following investment-related activities:

Registered Representative of a Broker-Dealer

David M. Brenner is a Registered Representative with Fortune Financial Services, Inc. ("FFS"). In such a capacity, he may sell securities through FFS and receive normal and customary commissions as a result of such purchases and sales. This presents a conflict of interest to the extent that he recommends that a client invest in a security which results in a commission being paid to him.

Insurance Agent or Broker

David M. Brenner is a licensed insurance agent (LIC. # 0801900) through numerous insurance companies. In such a capacity, he may offer insurance products and receive normal and customary commissions as a result of such a purchase. This presents a conflict of interest to the extent that he recommends the purchase of an insurance product which results in a commission being paid to him as an insurance agent.

David M. Brenner receives commissions on the sale of securities, insurance or other investment products for services related to the implementation of financial planning recommendations.

In every situation, the client's needs are considered first and recommendations are made without regard to additional compensation.

NON- INVESTMENT-RELATED ACTIVITIES

David M. Brenner is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

ITEM 5 ADDITIONAL COMPENSATION

David M. Brenner does not receive any economic benefit from a non-advisory client for the provision of advisory services.

ITEM 6 SUPERVISION

David M. Brenner is responsible for all supervision and formulation of client recommendations. David M. Brenner reviews all employee personal securities transactions on an annual basis, leads investment committee meetings, oversees all material investment policy changes, and conducts periodic testing to ensure that client objectives and mandates are being met.

ITEM 7 REQUIREMENTS FOR STATE-REGISTERED ADVISERS

1. David M. Brenner has not been found liable in an arbitration claim alleging damages in excess of $2,500, involving any of the following:

   (a) an investment or an investment-related business or activity;
   (b) fraud, false statement(s), or omissions;
   (c) theft, embezzlement, or other wrongful taking of property;
   (d) bribery, forgery, counterfeiting, or extortion; or
   (e) dishonest, unfair, or unethical practices.

2. David M. Brenner has not been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

   (a) an investment or an investment-related business or activity;
   (b) fraud, false statement(s), or omissions;
   (c) theft, embezzlement, or other wrongful taking of property;
   (d) bribery, forgery, counterfeiting, or extortion; or
   (e) dishonest, unfair, or unethical practices.

3. David M. Brenner was subject to a Chapter 7 bankruptcy petition in 1993.

Part 2B of Form ADV: *Brochure Supplement*

D.M. BRENNER, INC.
REGISTERED INVESTMENT ADVISOR

"Financial Planning ... *It's not always about money.*"

380 STEVENS AVENUE, SUITE 213, SOLANA BEACH, CA 92075

Alexandra C. Kinander, CFP®

CRD # 5346286

Telephone: (858) 345-1001
Email: david@dmbrenner.com
Web Address: www.dmbrenner.com

April 30, 2018

This brochure supplement provides information about Alexandra C. Kinander that supplements the D. M. Brenner, Inc. brochure. You should have received a copy of that brochure. Please contact Alexandra C. Kinander at (858) 345-1001 if you did not receive D. M. Brenner, Inc.'s ADV brochure or if you have any questions about the contents of this supplement.

Additional information about Alexandra C. Kinander is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 1 COVER PAGE

Please refer to previous page.

ITEM 2 EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

EDUCATION

- Pontifical Catholic University of Sao Paulo; Bachelor, Law; 1997
- Getulio Vargas Business School; Bachelor, Business; 1997
- Pontifical Catholic University of Sao Paulo; Masters, Commercial Law; 2002

BUSINESS EXPERIENCE

- D.M. Brenner, Inc.; Financial Planner, Investment Adviser Representative from 08/2011 to Present
- Fortune Financial Services, Inc.; Registered Representative; from 05/2013 to Present
- Self; Financial Consultant; from 05/2007 to Present
- SCF Securities, Inc.; Registered Representative; from 08/2011 to 05/2013
- LPL Financial LLC; Registered Representative; from 06/2007 to 08/2011
- JL Body Conditioning; Instructor; from 02/2004 to 04/2007
- Souza Cescon Advogados; Senior Associate; from 09/2002 to 01/2004
- Davis Polk & Wardwell; Foreign Associate; from 09/2001 to 09/2002

DESIGNATIONS

Alexandra C. Kinander has earned the following designation(s) and is in good standing with the granting authority:

Certified Financial Planner™; Certified Financial Planner Board of Standards, Inc.; 2011

The program is administered by the Certified Financial Planner Board of Standards Inc. Those with the CFP® designation have demonstrated competency in all areas of finance related to financial planning. Candidates complete studies on over 100 topics, including stocks, bonds, taxes, insurance, retirement planning and estate planning. In addition to passing the CFP® certification exam, candidates must also complete qualifying work experience, agree to adhere to the CFP Board's code of ethics and professional responsibility and financial planning standards and complete 30 hours of continuing education every two years.

ITEM 3 DISCIPLINARY INFORMATION

Alexandra C. Kinander has no reportable disciplinary history.

ITEM 4 OTHER BUSINESS ACTIVITIES

INVESTMENT-RELATED ACTIVITIES

Alexandra C. Kinander is also engaged in the following investment-related activities:

Registered Representative of a Broker-Dealer

Alexandra C. Kinander is a Registered Representative with Fortune Financial Services, Inc. ("FFS"). In such a capacity, she may sell securities through FFS and receive normal and customary commissions as a result of such purchases. This presents a conflict of interest to the extent that she recommends that a client invest in a security which results in a commission being paid to her.

Insurance Agent or Broker

Alexandra C. Kinander is a licensed insurance agent (LIC. # 0F80681) through various insurance companies. In such a capacity, she may offer insurance products and receive normal and customary commissions as a result of such purchase. This presents a conflict of interest to the extent that she recommends the purchase of a product which results in a commission being paid to her as an insurance agent.

Alexandra C. Kinander receives commissions, bonuses or other compensation on the sale of securities or other investment products.

NON- INVESTMENT-RELATED ACTIVITIES

Alexandra C. Kinander is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his or her time.

ITEM 5 ADDITIONAL COMPENSATION

Alexandra C. Kinander does not receive any economic benefit from a non-advisory client for the provision of advisory services.

ITEM 6 SUPERVISION

Mr. David M. Brenner, Chief Compliance Officer, is responsible for all supervision and formulation and monitoring of investment advice offered to clients by Alexandra C. Kinander. He can be reached at 858-345-1001. Mr. Brenner reviews all employee personal securities transactions annually, leads investment committee meetings, oversees all material investment policy changes, and conducts periodic testing to ensure that client objectives and mandates are being met.

ITEM 7 REQUIREMENTS FOR STATE-REGISTERED ADVISERS

1. Alexandra C. Kinander has not been found liable in an arbitration claim alleging damages in excess of $2,500, involving any of the following:

   (a) an investment or an investment-related business or activity;
   (b) fraud, false statement(s), or omissions;
   (c) theft, embezzlement, or other wrongful taking of property;
   (d) bribery, forgery, counterfeiting, or extortion; or
   (e) dishonest, unfair, or unethical practices.

2. Alexandra C. Kinander has not been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

   (a) an investment or an investment-related business or activity;
   (b) fraud, false statement(s), or omissions;
   (c) theft, embezzlement, or other wrongful taking of property;
   (d) bribery, forgery, counterfeiting, or extortion; or
   (e) dishonest, unfair, or unethical practices.

3. Alexandra C. Kinander has not been the subject of a bankruptcy petition.