

# **BROCHURE**

## **Tomas A. Blanno & Company, LLC**

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This Brochure (Part 2A of Form ADV) provides you with information about the qualifications, business practices and advisory services of Tomas A. Blanno & Company, LLC. It contains information that you should consider before becoming a client of our firm.

The information contained herein has not been approved or verified by any governmental authority. Our firm is an investment adviser firm registered pursuant to the laws of the State of Georgia. Registration does not imply a certain level of skill or training, only that we have filed registration documents in the appropriate jurisdiction and with the respective governmental entities.

Additional information about Tomas A. Blanno & Company, LLC can be found on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by using our identification number (referred to as a CRD number). Tomas A. Blanno & Company's CRD No. is 144595.

The Brochure Supplement (Part 2B of Form ADV) for the Investment Adviser Representative of the firm begins on page 22 of this document.

**A. New Regulatory Mandates**

This brochure format is a new regulatory requirement mandated by amendments to the Investment Advisers Act of 1940 and applicable state laws, such as the Georgia Uniform Securities Act of 2008, which became effective October 12, 2010. The U.S. Securities and Exchange Commission (SEC) issued a final rule in October 2010 requiring investment advisers to provide a Firm Brochure in narrative “plain English” format and states subsequently adopted the same provisions.

**B. Material Changes since last update**

There have been no material changes made to Tomas A Blanno and Company, LLC since the last update of our brochure dated September 26, 2023.

**C. Subsequent Updates to Brochure**

Future updates to this brochure will be discussed in this section. We will highlight material changes and modifications to our business practices and inform you of the same. We will also provide you with a revised brochure as required.

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## ITEM 4 ADVISORY SERVICES

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### **A. About Our Business**

Tomas A. Blanno & Company, LLC (hereinafter, "Blanno & Co.", or the "Firm") is an investment advisory firm that provides discretionary asset management services and comprehensive financial planning services and consultations. The Firm is a Georgia limited liability company that has been responsible for managing clients' assets since 2007. We are registered to provide advisory services in the states of Georgia and Texas. Our firm's principal owner is Tomas A. Blanno. Mr. Blanno is the Investment Adviser Representative and Chief Compliance Officer of the firm.

### **B. Types of Advisory Services**

The investment recommendations and advice offered by Blanno & Co. are not legal advice or tax advice. You should coordinate and discuss the impact of financial advice with your Tax attorney and/or CPA.

We are an investment adviser that provides financial advisory services to Individuals, including High Net-worth Individuals, Corporations, and other Business entities. We also assist clients in planning for their future by developing financial plan, ongoing investment portfolio monitoring and providing financial consultations. Through Schwab Advisor Services / Charles Schwab & Co, Inc. , Member SIPC , we can provide our clients access to investments solutions: Equities, Alternative Investments, Bonds, CD's, Fixed Income, Mutual Funds, ETF's. We also provide our client's access to other third-party providers of investment management services, managed products, multi-manager account, and third-party strategists. Securities clearing, custody, or other brokerage services may be provided by Schwab Advisor Services / Charles Schwab & Co, Inc. , Member SIPC.

#### *1. Asset Management*

Blanno & Co. offers discretionary asset management services, portfolio construction, and other products to meet our client's investment goals and objectives. Our advice regarding financial securities encompasses listed, over-the counter Equities, Mutual Funds, Exchange Traded Funds (ETFs), Unit Investment Trusts (UITs), Real Estate Investment Trusts (REITs), Municipal Securities, United States Government Securities, and certain banking products such as Certificates of Deposits.

#### *2.- IRA Rollover Considerations*

As part of Blanno & Co. investment advisory services, the firm may recommend that clients withdraw assets from their employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that Blanno & Co. will manage on the client's behalf. If the client elects to roll the assets to an IRA that is subject to Blanno & Co. management, an asset based fee will be charged as set forth in the agreement executed with the firm. This practice presents a conflict of interest because persons providing investment advice on Blanno & Co. behalf have an incentive to recommend a rollover for the purpose of generating fees-based compensation rather than solely based on client needs. Clients are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if clients do complete the rollover, they are under no obligation to have the assets in an IRA managed by Blanno&Co

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, clients should consider the costs and benefits of:

An employee will typically have four options:

1. Leaving the funds in the employer's (former employer's) plan.
2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change Blanno & Co. encourages clients to speak with a CPA and/or tax attorney.

Clients should consider the following, when considering whether to rollover retirement funds into an IRA managed by Blanno & Co.:

1. Determine whether the investment options in the employer's retirement plan address their needs or whether they might want to consider other types of investments.
  - a. Employer retirement plans generally have a more limited investment menu than IRAs.
  - b. Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
2. Client current plan may have lower fees than our fees.
  - a. If clients are interested in investing only in mutual funds, they should understand the cost structure of the share classes available in their employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
  - b. Clients should understand the various products and services they might take advantage of at an IRA provider and the potential costs of those products and services.
3. Blanno & Co, strategy may have higher risk than the option(s) provided to clients in their plan.
4. Client current plan may also offer financial advice.
5. If clients keep their assets titled in a 401k or retirement account, according to the Secure Act 2.0 beginning January 2023 clients must begin taking Required Minimum Distribution at age 73. In 2033, the RMD age will increase to 75.
6. If clients are separating from service with their employer between the ages 55 and 59.5 they may withdraw money from a 401k penalty free.
7. Clients 401k may offer more liability protection than a rollover IRA; each state may vary.
  - a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so clients should consult with an attorney if they are concerned about protecting their retirement plan assets from creditors.
8. Client may be able to take out a loan on their 401k, but not from an IRA.
9. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax

and may also be subject to a 10% early distribution penalty before client reach 59 ½, unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.

10. If clients own company stock in their plan, they may be able to liquidate those shares at a lower capital gains tax rate.
11. Clients plan may allow them to hire Blanno & Co. as the manager and keep the assets titled in the plan name.

It is important that the client understand the differences between these types of accounts and to decide whether a rollover is best for their circumstances. Prior to proceeding, if a client has questions, they are encouraged to contact their investment adviser representative, or call Blanno & Co. main number as listed on the cover page of this brochure.

### *3. Managed Account Solutions*

The Firm may, from time to time, select and recommend other advisers (third-party money managers) who may offer specialized portfolios. These portfolios are constructed to meet client objectives and the third party manager may manage all or a portion of a client's assets. The Firm currently utilizes and/or makes available separately managed account programs through Third party provider's solutions, including Turnkey Asset Management Programs (TAMPs) to clients. These platforms provide separately managed portfolios and mutual fund wrap fee programs. Blanno & Co. is responsible for providing continuous rebalancing and monitoring of client securities holdings that are managed by these platforms.

### *4. Financial Planning & Consultations*

Blanno & Co. also formulates financial plans, and asset allocation to assist clients in reaching their financial and retirement goals. The Firm provides consultations and develops plans by evaluating data relative to a client's personal financial profile, investment objectives and goals, risk tolerance, and tax status. The financial plan also includes information regarding retirement planning, advanced education planning, college planning, plans for major purchases, life and disability insurance needs, long-term care needs, and simple estate planning issues. The formulated plan may not include information or analysis with respect to tax liabilities, risks or complex estate planning. Financial planning services include financial statement and income tax analysis, asset allocation, accumulation goals, risk management, business planning, retirement, and estate analysis.

## **C. Tailored Services**

Our services are based on the client's individual needs, after a thorough assessment of their goals, objectives, investment horizon, and risk tolerance. We use Investment Policy Statements (IPS) to formulate investment and management decisions that meet the client's stated criteria. Clients may impose restrictions on investing in certain asset classes or any specific types of securities.

## D. Wrap Fee Programs

Blanno & Co. is not a sponsor of a Wrap Fee Program(s) however, as indicated in Item 4.B.2, the Firm may invest client assets in mutual fund wrap fee programs sponsored by the manage account programs. The Firm will receive a portion of the management fee charged to clients who utilize the manage account programs.

## E. Assets under Management

The firm currently manages \$18,697,781 in client assets on a discretionary basis. The Firm's total Assets under Management is \$18,697,781 and these calculations are based on data of December 31, 2023.

## ITEM 5 FEES AND COMPENSATION

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### A. Advisory Fee

Blanno & Co. assesses advisory fees in accordance with the following schedules:

#### 1. Asset Management Fees

Our fees for Asset Management Services are as follows:

Tomas A. Blanno & Company, LLC - Fee Schedule

<b>Assets Under Management</b>	<b>Maximum Annual Rate</b>
\$25,000 to \$250,000	2.50%
\$250,001 to \$500,000	2.00%
\$500,001 and above	1.75%

The final annual rate, as agreed upon, is outlined in the Investment Advisory Agreement. Our fees are assessed in advance either monthly or quarterly, as determined by client. Advisory fees will be calculated at the beginning of each period (monthly or quarterly). Fees will be based on the average daily balance (ADB) of client's assets under management for the previous period. The market value of the variable annuity and variable life products as of the end of each month will be included in the calculation of the management fee. In instances where client has multiple accounts, as determined by household, the Firm will aggregate accounts to determine the annual fee. However, for assets controlled by outside custodians, aggregation and inclusion of accounts for determining a fee breakpoint is subject to negotiation and agreement between client and the Firm. Beginning March 1, 2013 for all clients signing new account agreements on and after that date, assets moved and controlled by outside custodians that are not part of the firm Asset Management Agreement, and

which are no longer part of the aggregation and inclusion of the account to determine the calculation of the management fee breakpoint, the Annual fee will be automatically adjusted according to the above Asset Management Fee Schedule.

The annual Asset Management Fee Schedule includes preparation of an Analysis and Monitoring Report for each client. The monitoring report analysis is made available to clients by a quarterly written report.

Clients have the option to authorize Blanno & Co. to deduct the asset management fees directly from client's Account. In any case, Blanno & Co will provide clients with a fee invoice that identifies the advisory fee, the value of the account and how the fee was calculated. Additionally, the account statement from the custodian will also reflect the deduction of the advisory fee. Instead of automatic debits, Clients may elect to pay advisory fees directly to the Firm upon receipt of the monthly or quarterly invoice.

Clients are also permitted to make additions to or withdrawals from the account at any time. Deposits in the amount of \$5,000 or more after the account is opened will be charged a pro-rata management fee based upon the number of days remaining in the current month or calendar quarter. Additionally, fee credits will be issued to the account for partial withdrawals from the account in amounts of \$5,000 or more during a month or calendar quarter. Nonetheless, no fee adjustments will be made for account appreciation or depreciation.

The Firm or client may terminate the advisory agreement at any time upon five (5) days written notice. Moreover, clients may terminate an account without penalty (full refund), within five (5) days of signing their advisory agreement.

## 2. Separately Managed Portfolios Fees

Separately Managed Portfolios are subject to the same advisory fee schedule, terms and conditions as outlined in the foregoing section. The selected third party money manager will retain a portion of the management fee.

## 3. Financial Planning Fees

### (a) Hourly Fees

We earn fees for financial planning services by charging an hourly rate. Depending on the complexity of the financial plan and needs of the client, our hourly fees for financial planning services may range up to \$750.00 per hour. The hourly rate is negotiable and the final agreed upon rate, is due upon completion of the financial plan or in the event of ongoing-financial planning services or consultations, invoiced monthly.

### (b) Fixed Fees

Blanno & Co. also has a fixed fee schedule for financial planning services and consultation. Depending on the complexity of the financial plan and the needs of the client, our fixed fees for financial planning services may range up to \$15,000. The fixed fee is negotiable. Upon agreement as to the final fee, one-half (1/2) of the fee is payable upon execution of the Financial Planning Agreement and the

balance is due at the time of presentation of the plan, unless otherwise negotiated.

In the event of termination of the Financial Planning Agreement, clients will receive a full refund of any pre-paid fees for planning services at any time up to presentation of the financial plan. Clients may terminate financial planning services within five (5) business days after entering into the Financial Planning Agreement without penalty. After the five (5) business day period, clients may terminate the agreement by providing the Firm with at least five (5) days written notification. Client will incur costs for any time spent by the Firm providing advisory services or analyzing the client's situation. Refunds of prepaid financial planning fees will be calculated based on an hourly rate of \$750 per hour.

## **B. Billing Procedures**

### **1. Asset Management Fees**

Our Asset Management fees are assessed in advance, and either monthly or quarterly, based on client preference. While it is a customary practice for Blanno & Co. to receive written authorization to deduct advisory fees directly from client account(s), clients may also choose the direct billing option.

### **2. Separately Managed Portfolio Fees**

Our Separately Managed Portfolio fees are assessed in advance and, either monthly or quarterly, based on client preference. It is customary practice for Blanno & Co. to receive written authorization to deduct advisory fees directly from client's account(s). The third-party money manager will retain a portion of the management fee.

### **3. Financial Planning & Consultations**

Our fixed and hourly Financial Planning fees are generally payable upon completion of the plan. In certain instances, a deposit may be required or monthly payment terms may be applicable.

## **C. Other Fees & Expenses**

Beginning July 1, 2011, the Company will begin charging an annual account maintenance fee of \$70 per account for all clients signing new account agreements on and after that date. It is important to note that the advisory and maintenance fees paid to Blanno & Co. are separate and distinct from the fees and expenses charged by mutual funds, brokers-dealers, custodians and other advisers. The latter is imposed by third parties in connection with investments made on behalf of your account. These fees and expenses may include, but are not limited to, no-load mutual fund 12(b)-1 distribution fees, certain deferred sales charges on previously purchased mutual funds, IRA and other Qualified Retirement Plan fees. Clients are responsible for payment of all maintenance fees and expenses.

## **D. Refund Policy**

Upon termination of the Investment Advisory or Financial Planning Agreements, either by the client or Blanno & Co., any prepaid, unearned fees will be promptly refunded or any earned, unpaid fees for any unbilled portion of a month will be collected prior to final disbursement of funds.

## **E. Other Compensation**

As an insurance agency, Blanno & Co. earns compensation for the sale of insurance products such as fixed annuities, health, disability and long-term care insurance. We also earn compensation for the sale of whole and term life insurance plans. See also, Item 10.C. for a more complete description of insurance affiliations. We also provide relevant advisory administrative services to clients such as bookkeeping and preparation of simple tax returns.

Nonetheless, neither Blanno & Co. nor its Investment Adviser Representative earns compensation/commissions for the sale of securities (including variable annuities) or from the sale of investment products, including asset-based sales charges or services fees from the sale of mutual funds. The Investment Adviser Representative of the firm is not registered with any Broker Dealer in any investment sales capacities.

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

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Tomas Blanno & Company does not charge performance-based fees and does not conduct side-by-side investment product management of dissimilar advisory accounts.

## **ITEM 7 TYPES OF CLIENTS**

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Blanno & Co. manages wealth portfolios for many different types of clients. We generally provide advice to Individuals, High Net-Worth Individuals, Corporations and other Business entities. There is a minimum value of \$25,000 for establishing an account. This minimum account value may vary depending on the type of services. Blanno & Co. reserves the right to waive the minimum based on the complexity of the client's situation and needs, the amount of assets under management, related accounts, or any other reasons in Blanno & Co.'s sole discretion.

## **ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS**

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### **A. Methods of Analysis, Investment Strategies, and Risk of Loss**

Blanno & Co. utilizes a variety of methods to analyze investments including, fundamental, and technical analysis. Our main sources of information include but are not limited to financial newspapers and magazines, inspection of corporate activities, research materials prepared by others, and annual reports, prospectuses, and corporate filings with the SEC. We do not recommended individual stocks, but will custody as a holding within the portfolio or as a part of the IPS for clients who wish to buy stocks on their own initiative.

We employ fundamental analysis as our primary method for analyzing funds, portfolios and other investment products to achieve the objectives and goals of our clients. Fundamental analysis consists

of analyzing financial statements of companies, calculating financial ratios, and reviewing cyclical trends of industries in conjunction with monetary policy indicators to assess the overall performance and profitability of companies.

We primarily utilize asset allocation strategies mostly by customizing third-party allocation models. We also employ in depth research and due diligence methodologies to analyze both proprietary and third party statistical performance information relative to portfolios. We use portfolio construction tools, including a subscription-based analytic tool, that define investable assets and constructs model portfolios using multiple model filters and risk tolerance questionnaires to establish limits for asset classes and investment decisions. Blanno & Co. conducts a client risk assessment and creates an Investment Policy Statement (IPS) that is designed to monitoring risk parameters for each client's investment objective. The investment policy process includes screening various asset classes and investment management styles that, in total, are expected to offer clients portfolio diversification that is consistent with the stated risk and return requirements.

With respect to analyzing investments, Blanno & Co reviews the performance record of the Exchange Traded Funds (ETFs), mutual funds, or portfolio holdings. We select mutual funds, ETFs or portfolio managers that have a minimum three-year positive earnings history and the fund or portfolio should have at least \$75 million in assets under management. The stability of the organization is extremely important; the portfolio manager should have at least two-year tenure. We also review the composition of portfolios for consistency within stated asset classes and require that a minimum of 80% of the mutual fund's securities or portfolio composition is consistent with comparative asset classes.

## **B. Material Risks of Methods of Analysis and Investment Strategies**

Blanno & Co. utilizes common analysis methods and investment strategies but even so, there remains some level of material risk. We primarily utilize fundamental analysis methods to measure the risks of companies by formulating assumptions based on historical financial representations. Although we use valid data sources, examine financial ratios extensively, refer to economic indicators, and review the implications of monetary policy, our strategies are implemented as result of the assumptions derived from the analysis of historical data. The results of investment strategies derived from this method of analysis are not guaranteed and past performance of investment is not indicative of future financial returns.

Analogous risks also exist with respect to analyzing securities and implementing advice and strategies based on technical analysis. Although technical analysis is not our primary method of analysis, we may at times, utilize it to evaluate the future profitability of holdings. Technical analysis relies on appraisal of trends in current market conditions to make interpretations about future price trends of a company's securities or stock market composites. We may use charts, moving averages and trading volumes to formulate and implement investment strategies. Due to the unique trends in the market, technical analysis may not always yield a productive investment strategy. Furthermore, the results of investment strategies derived from this method of analysis are not guaranteed and the material risk involves inaccuracy in future performance predictions.

Notwithstanding the method of analysis or investment strategy employed by our firm, the assets within portfolios are subject to risk of devaluation or loss. Blanno & Co. wants clients to be aware that there are many different events that can affect the value of assets or portfolios including but not limited to, changes in financial status of companies, market fluctuations, changes in exchange rates, trading suspensions and delays, economic reports, and natural disasters. While this information provides a synopsis of the events that may affect your investments, this listing is not exhaustive. **There are inherent risks associated with investing and depending on the risk occurrence; clients may suffer LOSS OF ALL OR PART OF THEIR PRINCIPAL INVESTMENT.**

### **C. Recommendation of Specific Types of Securities**

Blanno & Co. does not focus its advice on, or make recommendations relative to, any particular type of security. As described in Item 4.B.1, our advisory services encompass an array of securities and investment vehicles.

## **ITEM 9 DISCIPLINARY INFORMATION**

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Neither Blanno & Co. nor its management has been involved in legal or disciplinary events related to our advisory business.

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

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### **A. Financial Industry Activities**

Blanno & Co. is not a registered broker-dealer and does not have an application pending to register as a broker-dealer. Additionally, none of the Firm's management or investment adviser representatives has dual registrations as, or applications pending to register as, securities salespersons.

### **B. Financial Industry Affiliations**

Blanno & Co. is not registered as, and does not have an application pending to register as, a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor. Furthermore, the Firm's management or investment adviser representatives are not registered as, and do not have applications pending to register as, associated persons of the foregoing entities.

### **C. Other Material Affiliations**

Tomas A. Blanno & Co. is also an insurance agency that sells insurance products for risk management and income protection. Our insurance offerings include life insurance, disability insurance, long-term care, group life and health, and fixed annuities. Many of our insurance products are sold through separate vendors. Our investment adviser representative, Tomas A. Blanno is also a licensed insurance agent that is authorized to conduct business through the aforementioned and various select insurance vendors. Our firm and Mr. Blanno devote less than 1% of the workweek to selling insurance products.

In our capacity as an insurance agency, Blanno & Co. will receive separate, yet customary compensation for insurance product sales. Insurance products may be available through more cost effective channels, and clients are not obligated to purchase insurance products recommended by the Firm.

Acting in dual capacities and receiving compensation as such, may create conflicts of interest or may give the perception of conflicts of interest. Any conflicts of interest or perceived conflicts of interest will be disclosed to the client in writing and prior to finalizing purchases.

Nonetheless, Blanno & Co. does not have a material arrangement or relationship with a related person that is a broker-dealer, municipal securities dealer, government securities dealer or broker, investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund, futures commission merchant, commodity pool operator, commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, pension consultant, real estate broker or dealer, sponsor or syndicate of limited partnerships.

#### **D. Other Investment Advisers**

Blanno & Co. the Firm, reserves the right to enter into subsequent asset management or sub-advisory agreements with other investment advisers in order to offer a variety of investment products to its clients. Due to the nature of these arrangements, the compensation derived from advisory products and services of other investment advisers can result in a substantial concentration of products and services that benefit the Firm. To mitigate or remedy any conflicts of interest, these arrangements are fully disclosed to the client before effecting transactions. Additionally, Blanno & Co.’s Chief Compliance Officer will periodically review client transactions to assess over-concentration, evaluate client suitability to ensure compatibility with advisory programs and assess fee structures with respect to the concentration of products and services offered by a specific investment adviser.

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

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#### **A. Code of Ethics**

Tomas A. Blanno & Company, its management or investment adviser representatives (collectively, “personnel”) subscribe to a strict code of ethics. The Firm’s Ethics complies with the investment advisory laws and regulations that require firms to act as fiduciaries in transactions with their clients. Our inherent fiduciary duty requires that we act solely in our client’s best interest and adhere to standards of utmost integrity in our communications. These standards ensure that our client’s interests are given precedence.

In accordance with our fiduciary duty, the Firm has implemented extensive policies, procedures and guidelines that promote ethical practices and conduct by all of the Firm’s personnel. These policies and procedures are collectively referred to as our Code of Ethics. Our Code of Ethics is constructed to

prohibit certain types of transactions deemed to create conflicts of interest (or perceived conflicts of interest). Our Code of Ethics also establishes reporting requirements and enforcement procedures relating to personal transactions by the Firm's personnel. Blanno & Co.'s Code of Ethics, also encompasses guidelines for professional standards, insider trading, personal trading, gifts and entertainment, and establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. We will provide a copy of our complete Code of Ethics to any client or prospective client upon request.

**B. Participation or Interest in Client Transactions**

Blanno & Co. does not recommend that clients buy or sell for their accounts, securities in which an affiliate or related person may have material financial interest.

**C. Proprietary Trading**

We may at times, buy or sell securities for our own account that we have also recommended to clients. Blanno & Co. will always document transactions that could be construed as conflicts of interest. To mitigate or remedy any conflicts of interest or perceived conflicts of interest, we will monitor trading reports for adherence to our Code of Ethics.

**D. Simultaneous Trading**

From time to time, the Firm and its representatives may buy or sell advisory products for their own accounts at or around the same time as clients. In instances where similar securities are being bought or sold, we will uphold our fiduciary duties by always ensuring transactions are beneficial to the interest of our clients.

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ITEM 12 BROKERAGE PRACTICES

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**A. Selection and Recommendation**

Tomas A. Blanno & Company will select and recommend broker-dealers or custodians based on a number of factors, including but not limited to ease of administration, quality of execution and commission rates. Blanno & Co. currently utilizes Schwab Advisor Services / Charles Schwab & Co, Inc., Member SIPC to provide its brokerage and custodial services. Clearing and execution for Schwab Advisor Services, is facilitated through Charles Schwab & Co, Inc. Blanno & Co. reserves the right to utilize other or additional firms for brokerage, custodial and clearing services.

**1. Soft Dollar Benefits**

Blanno & Co. may generate soft dollar benefits and in these instances, the Firm complies with the "safe harbor" of Section 28(e) of the Securities Exchange Act of 1934, as amended. Under "soft dollar" arrangements, one or more of the brokerage firms would provide or pay the costs of certain services, equipment, or other items for the benefit of the Firm. These soft dollar arrangements may benefit Blanno & Co. by reducing operating expenses. Nonetheless, Blanno & Co. believes that to the extent, we direct brokerage transactions to generate soft dollar benefits; these arrangements generally

enhance our ability to obtain research services, optimal execution, and other products that benefit our clients. More importantly, Blanno & Co. does not segregate the interest of clients and no research, products or services will benefit the interest of a particular client just by virtue of that's clients transactions being effected by a broker-dealer providing such research or other products and services.

As of December 31, 2023, the Firm has not utilized any particular procedures to direct client transactions in return for soft dollar benefits. To the extent, the Firm were to direct client transactions for soft dollar benefits, the Firm requires approval by its Chief Compliance Officer prior to entering into any such soft dollar arrangement. The Firm's policies and procedures also require the maintenance of appropriate record of transactions (e.g., purchase orders, and records of determination of mixed-used allocations and service valuations) that generate "soft dollar" benefits.

## 2. Brokerage for Client Referrals

Blanno & Co. does not receive client referrals from broker-dealers or other third parties in exchange for its clients using a specific broker-dealer.

## 3. Directed Brokerage

(a) Blanno & Co. routinely recommends that clients utilize Schwab Advisor Services / Charles Schwab & Co, Inc. Our arrangement affiliation with Schwab Advisor Services / Charles Schwab & Co, Inc., is designed to maximize transaction efficiency and cost effectiveness for our clients. By recommending that clients use our preferred custodian, we seek to achieve most favorable results when allocating and rebalancing assets.

(b) Blanno & Co. does not permit clients to direct brokerage. We have entered into agreements with broker-dealers (custodians) with different acceptance criteria and fee structures. We recommend that our clients utilize the broker-dealers (custodians) with which we have established relationships in order to maximize cost effectiveness and transaction efficiency.

## **B. Order Aggregation**

During the regular course of business, we may at times aggregate orders for multiple advisory accounts in order to obtain the best pricing averages and minimize trading costs for our clients. Accordingly, our policies and procedures mandate allocating orders to the appropriate client accounts equitably and expeditiously. We have instructed our broker-dealers (custodians) to process our clients' trades in the most cost effective manner while securing quality of execution. The Chief Compliance Officer will review transactions periodically to detect and prevent excessive costs related to non-compliance with order aggregation procedures.

## ITEM 13 REVIEW OF ACCOUNTS

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### **A. Periodic Reviews**

Tomas A. Blanno & Company's criterion for reviewing client accounts is as follows:

#### **1. Portfolio Reviews**

Blanno & Co. reviews account activity quarterly and at least annually, performs a detailed review of client account activity. Tomas A. Blanno, the Chief Compliance Officer, conducts such reviews of accounts. The reviews consist of determining whether clients' portfolios align with investment goals and objectives. If reallocation of investments is necessary, we may sell underperforming investments or and rebalance with new investments that are more appropriate for the client's investment goals and objectives.

#### **2. Separately Managed Portfolio Adjustments**

Blanno & Co. reviews account activity quarterly and at least annually, performs a detailed review of clients' portfolios to ensure that the investment objective of the portfolio continuously aligns with the client's investment policy statement. This process includes reviewing the various asset classes, investment management styles, and specified risk and return requirements of the portfolio. If reallocation is necessary, we may select or recommend different portfolios or third party managers.

#### **3. Review of Financial Plans**

Blanno & Co. prepares its financial plans based on the financial data that clients provide to our firm. Financial plans are updated upon the client's election and request to do so. Once a client elects to revise a financial plan, a summary of the services to be rendered and relevant fees, will be delineated in a new financial planning agreement. It is the client's responsibility to provide financial updates for information contained in the comprehensive Financial Plan, Investment Questionnaire, Fact Finder, or cash flow synopsis.

### **B. Intermittent Review Factors**

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or by changes in your financial status (such as retirement, termination of employment, relocation, or inheritance).

### **C. Client Reports**

Blanno & Co. issues quarterly reports. The reports are generally in the form of a Portfolio Monitoring Report, Snapshot Report or Performance Report. Additionally, clients will receive statements at least quarterly, from the account custodian, detailing account activity, holdings, performance, transaction, and management fees.

## ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

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### **A. Economic Benefits for Advisory Services Rendered**

The Firm does not receive an economic benefit (such as sales awards or other prizes) from any third party for providing investment advice or other advisory services to its clients.

### **B. Compensation for Client Referrals**

Blanno & Co. does not compensate, directly nor indirectly, any (non-supervised) person for client referrals.

## ITEM 15 CUSTODY

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### **A. Custodian of Assets**

Blanno & Co. does not have physical custody of any client funds or securities. Our firm has indirect custody of funds and securities because of our authorization and ability to deduct advisory fees directly from clients' accounts. Our clients' assets are held by qualified custodians. Please see Item 12 for information regarding our account custodians.

### **B. Account Statements**

Account statements are mailed or sent electronically by the account custodian. Clients are advised to review these statements, comparing asset values, holdings, and advisory fees to that in previously received statements, confirmations, fee invoices and reports from Blanno & Co.

## ITEM 16 INVESTMENT DISCRETION

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### **A. Discretionary Authority**

It is customary for Blanno & Co. to have full discretionary authority in order to supervise and direct the investments of client's accounts. This authority is granted upon execution of our Investment Advisory Agreement. Discretionary authority is for the purpose of making and implementing investment decisions, without prior consultation with clients. All investment decisions are made in accordance with the client's stated investment objectives and clients may at any time during our engagement advise our firm in writing of limitations to be imposed on our authority.

#### **1. Standard Limitations**

Our discretionary authority does not give authority to take or have possession of any client assets or to direct delivery of any securities or payment of any funds held in the account to our firm. Furthermore, our authority by agreement does not allow us to direct the disposition of such securities or funds to anyone except the account owner.

## ITEM 17 VOTING CLIENT SECURITIES

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Blanno & Co. does not participate in proxy voting on behalf of clients. Our clients are responsible for directing their own proxies solicited by issuers of securities. Clients are responsible for making elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings and other types of events pertaining to the securities in your account. Clients will receive proxies and solicitation instructions for voting by mail from the account custodian.

## ITEM 18 FINANCIAL INFORMATION

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### **A. Balance Sheet Requirement**

Blanno & Co. does not require or solicit prepayment of advisory fees of more than \$500 per client, six (6) months or more in advance.

### **B. Discretionary Authority, Custody of Client Funds or Securities and Financial Condition**

It is customary for Blanno & Co. to exercise full discretionary authority with respect to supervising and directing the investments in client accounts. Additionally, we have indirect custody of client's funds or securities because of our authorization to withdraw advisory fees directly from client accounts. More importantly, Blanno & Co. does not have any financial condition that will impair our ability to meet contractual commitments to our clients.

### **C. Bankruptcy Petition Filings**

Neither Blanno & Co. nor Tomas A Blanno principal owner of the firm, have been the subject of a bankruptcy petition at any time during the past ten (10) years.

## ITEM 19 REQUIREMENTS FOR STATE-REGISTERED ADVISERS

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### **A. Firm Management**

Blanno & Co. is owned by Tomas A. Blanno. Mr. Blanno is the Firm's Chief Compliance Officer and Investment Adviser Representative. The education and business background information for the Firm's investment adviser representative is delineated in the attached Brochure Supplement (Form ADV Part 2B).

### **B. Other Business Activities**

Please see item 10.C., Blanno & Co. is also an insurance agency and offers Tax Preparation Services through our investment adviser representative, Tomas A. Blanno (PTIN # P01698530).

**C. Performance-Based Fees**

Blanno & Co. does not assess performance-based fees. Additionally, neither the Firm's management nor its investment adviser representative receives performance-based compensation from advisory clients.

**D. Disciplinary Disclosure Reporting**

**1. Arbitration Claims**

Neither the Firm nor its management persons has been found liable in any arbitration claim alleging damages in excess of \$2500 involving an investment or investment-related business or activity, fraud, false statements or omissions, theft, embezzlement or other wrongful taking of property, bribery, forgery counterfeiting or extortion or dishonest, unfair or unethical practices.

**2. Civil Litigation, Self-Regulatory Organization Proceeding, or Administrative Action**

Neither the firm nor its management persons has been found liable in any civil, self-regulatory organization, or administrative proceeding involving an investment or investment related business or activity, fraud, false statements or omissions, theft embezzlement or other wrongful taking of property bribery, forgery, counterfeiting, or extortion; or dishonest, unfair or unethical practices.

**E. Relationships or Arrangements with Securities Issuers**

Neither Blanno & Co. nor its management persons have additional relationships or arrangements with any issuers of securities.

ITEM 2 EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

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**A. General Requirements**

Tomas A. Blanno & Company, LLC requires that investment adviser representative applicants have at least, a 4-year college degree, 2 years relevant work experience in the securities industry, and have taken and passed the Series 65, or any other applicable state advisory exam(s), or alternatively, have earned certain professional designations such as Chartered Financial Consultant (ChFC) or Certified Financial Planner (CFP).

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**B. Investment Adviser Representative's Information**

**Tomas A. Blanno, Investment Adviser Representative**

**CRD No. 2141064**

**Year of Birth: 1957**

**C. Educational Background**

Bachelor of Science degree, Greensboro College, Greensboro, NC (1985)

Courses for CFS designation, The Institute of Certified Fund Specialists, La Jolla, CA (1995)

Courses for ChFC designation, The American College, Bryn Mawr, PA (2003)

**D. Business Experience**

**Chief Compliance Officer and Investment Adviser Representative (2007 - Present)**

Tomas A. Blanno & Company, LLC, Investment Advisory Firm

**Principal Owner and Manager Director (2004 - Present)**

Tomas A. Blanno & Company, LLC, Financial Services and Insurance Agency

**Registered Representative and Investment Adviser Representative (2003 – 2007)**

Securities America, Inc., Broker/Dealer and its advisory affiliate,  
Securities America Advisors, Inc.

**Member of Operations (2003 - 2007)**

Integrated Support Services, Inc. (a Division of Securities America)

***Allmerica Financial/Porraro & Associates (1990-2004)***

### ITEM 3 DISCIPLINARY INFORMATION

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**A. Criminal or Civil Actions**

None. See Item 19D.2 of Part 2A

**B. Administrative Actions or Proceedings**

None. See Item 19D. 1 of Part 2A

**C. Self-Regulatory Organization (SRO) Proceedings**

None. See Item 19D. 1 of Part 2A

**D. Professional Standards Violations**

None.

### ITEM 4 OTHER BUSINESS ACTIVITIES

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**A. Investment Related**

Tomas A. Blanno is not actively engaged in any other investment related business other than providing investment advice as disclosed herein.

**B. Non-Investment Related**

Tomas A. Blanno is also licensed Insurance Agent who transacts insurance product sales through various insurance vendors. The insurance offerings may include life insurance, disability insurance, long-term care, group life and health, and fixed annuities. Mr. Blanno may earn separate, yet customary compensation for insurance product sales. Mr. Blanno may spend less than one percent 1% of his time selling insurance products.

Insurance products may be available through more cost effective channels, and as a client, you are not obligated to purchase insurance products recommended by our firm. Acting in and receiving compensation as a result of dual capacities (investment adviser representative and insurance agent), may create conflicts of interest or may give the perception of conflicts of interest. Any conflicts of interest or perceived conflicts of interest will be disclosed in writing and in advance of effecting such purchases.

Mr. Blanno also offers Tax preparation services (PTIN # 901698530). Mr. Blanno spends less than 2% of his time offering these services.

## ITEM 5 ADDITIONAL COMPENSATION

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### **Economic Benefits from Third Parties**

Tomas A. Blanno does not receive economic benefit (such as sales awards or other prizes) from any third-party for providing investment advice or other advisory services to its clients.

## ITEM 6 SUPERVISION

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### **Firm Supervision**

Tomas A. Blanno is our Chief Compliance Officer and is an Investment Adviser Representative of the Firm. Mr. Blanno is responsible for the providing advice to clients and administration of the firm's operations. The Firm administers supervision through application of its written policies and procedures.

## ITEM 7 REQUIREMENTS FOR STATE REGISTERED INVESTMENT ADVISERS

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### **A. Additional IAR Disciplinary Events**

#### A.1 Arbitration Claims

None. See Item 19 D of Part 2A (Firm Brochure).

#### A.2 Self-Regulatory Organization or Administrative Proceedings

None. See Item 19D of Part 2A (Firm Brochure).

### **B. IAR Bankruptcy Petitions**

None.