## Item 1 -- Cover Page

# Mighty Oak Strong America Investment Company

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## Part 2A of Form ADV: Firm Brochure

## March 19, 2026

**This brochure provides information about the qualifications and business practices of the Mighty Oak Strong America Investment Company ("MOSAIC"). If you have any questions about the contents of this brochure, please contact us at 717-790-9001 or email at ddemuth@investwithmosaic.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration does not imply a certain level of skill or training.**

**Additional information about the Mighty Oak Strong America Investment Company (IARD# 123322) is also available on the SEC's website at www.adviserinfo.sec.gov.**

# Item 2 -- Material Changes

**Annual Update**
The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the brochure.

**Material Changes since the Last Update**
The Firm has no material changes to report since its last ADV annual amendment filing of February 10, 2025.

**Full Brochure Available**
Whenever you would like to receive a complete copy of our brochure, please contact us by telephone at: 717-790-9001 or by email at: ddemuth@investwithmosaic.com.

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## Item 4 -- Advisory Business

The Mighty Oak Strong America Investment Company ("MOSAIC") was incorporated and began conducting its business in 2002. Donald L. DeMuth owns 100% of its common stock. MOSAIC provides investment supervisory services. MOSAIC furnishes investment advice through consultations with clients and prospective clients including financial planning.

When MOSAIC provides investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way MOSAIC makes money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

**Ongoing Investment Management and Financial Planning Services**

Investment Management
MOSAIC assists in the selection of individual investments and manages portfolios for clients, which includes:

1. Assessing client risk tolerance.
2. Assisting clients in developing an Investment Policy Statement.
3. Recommend and monitor a portfolio of individual securities, mutual funds, exchange-traded funds, and other investments to help clients achieve their investment goals with a risk tolerance with which they are comfortable.
4. Help clients open and maintain accounts with custodians.
5. Maintain trade information and reconcile monthly account statements with custodians.
6. Coordinate with custodian on individual investor's situations.
7. Prepare customized quarterly statements for investors.
8. Access institutional asset class funds not generally available to the public.
9. Transmit trading information from clients to custodian.

The Client's assets will be invested based on a client's risk tolerance and investment policy statement. MOSAIC generally manages advisory accounts on a discretionary basis.

Clients and prospective clients complete a risk assessment questionnaire to assist in developing a Risk Tolerance Profile so that their portfolio will be appropriate for the level of risk with which they are comfortable taking. Each client has a unique portfolio designed to suit their expected return requirements and risk temperament. Clients may impose restrictions on investments in specific securities or types of securities.

Financial Planning
Clients with assets under management of $1 million or more receive an initial personal financial analysis as well as a financial plan along with recommendations and periodic updates. Clients with fewer than $1 million in assets under management will receive a portfolio evaluation with recommendations.

In general, a financial plan will address any and all of the following areas, depending on a client's stated needs and goals: personal-family records, budgeting, personal liability, estate information, and financial goals. In constructing the financial plan, MOSAIC will review and analyze documents and information related to the following:

Tax and cash flow --income tax and spending analysis and planning for current and future years. MOSAIC may illustrate the impact of different investments on a client's current income tax and future tax liability.

Death and disability --assets needed at death, income needs of surviving dependents, estate planning, and disability income analysis.

Retirement --analysis of current strategies and investment plans to help the client achieve his retirement goals.

Investments --analysis of investment alternatives and their effect on a client's portfolio.

MOSAIC gathers this information through in-depth personal interviews. The information gathered includes a client's current financial status, future goals, and attitudes toward risk. Related documents provided by the client are carefully reviewed, including a questionnaire completed by the client. A written report is prepared. Should a client decide to implement recommendations contained in the plan, MOSAIC recommends that the client work closely with his accountant, attorney, and other critical financial advisors.

Sub-Adviser

For investment management, MOSAIC may use an unaffiliated, independent investment adviser ("sub-adviser") to manage all or a portion of a client's account(s). MOSAIC has entered into an agreement with a sub-adviser to provide investment management services to clients, and it is through this arrangement that MOSAIC may recommend and use sub-adviser's investment strategies and services for its clients' account(s), when appropriate, based on the needs of the client. Sub-adviser will have discretionary authority to determine the securities to be purchased and sold for clients' accounts managed by sub-adviser based upon the information and restrictions communicated in the account setup form and information communicated to the sub-adviser by MOSAIC. Clients can place reasonable restrictions on the sub-adviser's management of the account(s).

MOSAIC will perform initial and ongoing oversight and due diligence over the selected sub-adviser ensuring that the strategies and target allocations are aligned with clients' investment objectives and best interests.

Tax Preparation

Clients with assets under management with MOSAIC of greater than $500,000 can elect to allow MOSAIC to arrange for them the preparation of their personal income tax return at no additional cost through DeMuth & Kaufman Professional Management Consultants, a certified public accounting firm related to MOSAIC further described below in Item 10. In this service, MOSAIC

arranges to have the personal income tax returns prepared by DeMuth & Kaufman Professional Management Consultants and reimburses them for their tax services. Clients with less than $500,000 in assets can elect to have DeMuth & Kaufman Professional Management Consultants conduct tax preparation on their behalf at their own cost.

**Limited-Scope Financial Planning Services**

When ongoing investment management is neither needed or desired, MOSAIC provides limited-scope financial planning services to clients that, depending upon the agreed upon services with the client, will cover the financial topics noted above and for which MOSAIC will review and analyze documents and information described above. Documents provided by the client are carefully reviewed, including a questionnaire completed by the client. MOSAIC will provide the client with a written financial plan with recommendations in the areas selected in the agreement. Once MOSAIC delivers the financial plan the engagement is complete.

This service does not include the implementation of any investment strategy or investment management services. Clients understand that the responsibility for financial decisions is theirs alone and that they are under no obligation to follow, either wholly or partially, any recommendations or suggestions that we provide. Should a client decide to implement recommendations contained in the plan, MOSAIC recommends that the client work closely with his accountant, attorney, and other critical financial advisors. Clients should understand that a conflict of interest exists because MOSAIC has an incentive to recommend our own investment management services to implement financial planning recommendations as we receive additional compensation for such services. Advice and recommendations may also be given on non-securities matters, and any implementation of our recommendations is entirely at the client's discretion. If clients do decide to act on such recommendations, clients always have the right to decide with whom they choose to do so.

As of December 31, 2025, MOSAIC managed the following client assets:

| | |
|---|---|
| Discretionary | $386,856,787 |
| Non-discretionary | $11,510,866 |
| Total | $398,367,653 |

## Item 5 -- Fees and Compensation

**Investment Management and Financial Planning**

Fees are typically based upon 1% of invested assets up to $4 million. Fees for clients with assets of $4 -$10 million are 0.95% of invested assets. Fees for clients with assets of $10 -$25 million are 0.75% of invested assets. Fees for clients with assets of $25,000,000 or more under management are negotiable. Current and former employees, their family members, and houses of worship are typically not charged.

All fees calculated as described above are not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client.

Client fees will be debited from their accounts at the start of each quarter. Clients will grant authority for MOSAIC to receive quarterly payments directly from their accounts held by an independent custodian. Each client will receive a quarterly invoice showing the amount of the fee, the value of the client's assets on which the fee was based and the specific manner in which the fee was calculated.

Fees are invoiced in advance at the beginning of each quarter based upon the fair market value of the client's account at the end of the previous quarter. New accounts are charged a pro-rata fee for the remainder of the quarter in which an account is opened.

Investment advisory agreements may be terminated by mutual agreement of the client and MOSAIC. A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days' written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

All fees paid to MOSAIC for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These funds and expenses are described in each fund's prospectus. These funds will generally include a management fee, other fund expenses, and a possible distribution fee. A client could invest in mutual funds directly without the services of MOSAIC. In that case the client would not receive the services provided by MOSAIC which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Certain funds recommended by MOSAIC also may not be available to the client directly. Accordingly, the client should review both the fees charged by the funds and the fees charged by MOSAIC to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Fees are normally deducted from clients' assets. Clients may request to be billed for their fees instead, and MOSAIC will accept payment by check.

Sub-Adviser Fees

The sub-adviser charges its fees as a percentage of assets under management per account on a quarterly basis, in advance using the fair market value of the assets on the last business day of each quarter. Any fee period of less than a quarter, either upon commencement or termination of sub-adviser’s services will be pro-rated according to the portion of the quarter to which it relates. Sub-adviser’s fees are in addition to any transaction fees charged by the custodian or broker, and are as follows:

| Domestic Strategies | Annual Rate | Quarterly Rate |
|---|---|---|
| $0 to $10 Million | 0.350% | 0.0875% |
| Next $10 Million | 0.250% | 0.0625% |

| | | |
|---|---|---|
| Next $30 Million | 0.150% | 0.0375% |
| Greater than $50 Million | 0.100% | 0.0250% |

For the following investment strategies, there is a fee in addition to the rates noted above in the Domestic strategies.

| Strategy | Additional Annual Rate | Additional Quarterly Rate |
|---|---|---|
| Foreign/Global Strategy | 0.050% | 0.0125% |
| Domestic SRI (only applicable to the first $20 Million of any single account) | 0.100% | 0.0250% |
| Foreign/Global SRI (only applicable to the first $20 Million of any single account) | 0.150% | 0.0375% |

Sub-adviser's fees are deducted directly from client accounts held at an independent custodian.

**Limited-Scope Financial Planning**

MOSAIC's Limited-Scope Financial Planning Fee is a non-negotiable, hourly fee based upon the hourly billing rate of the representative performing the work, and the representative working on the account is determined in the client's best interest based on the representative's particular expertise. Hourly fees range from $215 - $475. MOSAIC will provide an estimate of the total fee of the work in advance; however, the total fee may vary depending upon the scope of services and the complexity of the client's situation once the work has begun. MOSIAC will invoice the client for the fee upon completion of the work, and it will be due and payable upon receipt via check.

Other Fees

Clients will incur transaction fees charged by the custodian for some mutual fund and exchange-traded fund purchases and sales. Commissions are charged by the custodian for transactions involving individual stocks. The custodian generally offers to buy and sell fixed income securities with a bid-and-ask spread. Clients who invest in the real estate investment trust recommended by MOSAIC will also pay a stockholder servicing fee associated with that investment as described in greater detail in the prospectus and disclosure documents related to that investment.

MOSAIC does not accept commissions for the sale of securities or other investment products. It does not receive asset-based sales charges or service fees from the sale of mutual funds. It does not receive commissions. For mutual funds, only no-load or exchange traded mutual funds will be recommended to clients.

The relationship is not exclusive, and clients have the option to purchase investments

recommended by MOSAIC through other investment organizations not affiliated with MOSAIC.

## Item 6 -- Performance-Based Fees and Side-by-Side Management

MOSAIC receives no performance-based fees.

## Item 7 -- Types of Clients

MOSAIC's clients include individuals, pension, profit sharing, and other retirement plans, trusts, estates, charitable organizations, corporations, or other business entities.

MOSAIC has a minimum client relationship of $250,000, which may be waived at MOSAIC's discretion.

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

Method of Analysis
MOSAIC utilizes fundamental analysis to build, monitor, and maintain client portfolios. Sources of information used include research materials prepared by others, corporate rating services, financial periodicals, annual reports, prospectuses, Securities and Exchange Commission filings, company press releases, and inspections of corporate activities.

Investment Strategies
Investment strategies used to implement MOSAIC's investment advice given to clients primarily includes long-term purchases (securities held for at least a year). It may also include short-term purchases (securities sold within a year), trading (securities sold within 30 days), short sales, margin transactions, option writing, including covered options, uncovered options, or spreading strategies.

MOSAIC manages portfolios in several different ways including active and passive asset allocations. Active assets allocations may use individual equities in various strategies including short sales, margin transactions, and option writing. These strategies have additional degrees of risk that the client should understand before providing MOSAIC consent to engage in such strategies. MOSAIC’s management strategy typically utilizes no load mutual loads with active and passive investment strategies.

Client portfolios primarily are comprised of no-load mutual funds and exchange-traded funds, which are subject to fluctuations in investment values.

When it is in the client’s best interest, MOSIAC will recommend the use of a sub-adviser. The sub-adviser’s investment strategies and the risks associated with it will be explained in greater detail in the disclosure documents associated with the sub-adviser that clients receive prior to engaging the sub-adviser.

For clients who meet the eligibility criteria and in whose best interest it would be to make such

a recommendation, MOSAIC recommends investment in a real estate investment trust ("REIT"). Each client will receive a copy of the prospectus, which will describe in greater detail the investment strategies and risks associated with the investment.

Generally, the REIT's investment strategy is to originate, acquire and manage a portfolio of senior loans secured by commercial real estate primarily in the United States. The REIT directly structures, underwrites, and originates certain debt investments in connection with acquisitions, refinancings, and recapitalizations, as this provides it with the best opportunity to control borrower and partner relationships and optimize the terms of investments. The REIT is focused on senior floating-rate mortgage loans, including those that are secured by first priority mortgages on transitional commercial real estate properties. In addition to senior, floating-rate mortgage loans, the REIT may also invest in other real estate-related assets, including: (i) other commercial real estate mortgage loans, including fixed-rate loans, subordinated loans, B-Notes, mezzanine loans and participations in commercial mortgage loans; and (ii) commercial real estate securities, including commercial mortgage backed securities, unsecured debt of listed and non-listed REITs, collateralized debt obligations and equity or equity-linked securities. To a lesser extent, the REIT may invest in warehouse loans secured by commercial or residential mortgages, credit loans to commercial real estate companies, residential mortgage-backed securities and portfolios of single-family home mortgages.

Risk of Loss

Investing in securities involves the risk of loss that clients should be prepared to bear. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market value to decline.
- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic, and social conditions may trigger market events.
- Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar last year, because purchasing power is eroding at the rate of inflation.
- Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- 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.

- Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- Valuation Risks: Certain investments in which the account may invest, including, for example, complex securities and thinly traded or illiquid investments such as private equity limited partnerships, private real estate limited partnerships or other types of private placements, may be more difficult to value accurately, especially during periods of market disruption or extreme market volatility.
- Private Placement, Private Real Estate and Private Equity Investment Risk: In addition to the general risks to which all securities are subject, private placement securities including but not limited to private real estate and private equity investments are generally subject to restrictions on resale, and there may be no liquid secondary market or ready purchaser for such securities. MOSAIC may be unable to dispose of such securities when it desires to do so, or at a favorable time or price.

Specific risks associated with investment in the REIT include:

- Clients will not have the opportunity to evaluate future investments of the REIT before they are made.
- Purchases and repurchases of interests in the REIT are generally based on prior months' net asset values as opposed to public trading, and, because the net asset value is based on subjective valuations, it may not be reflective of the actual price at which the assets could be liquidated on any given day.
- There is no public trading market for shares in the REIT; therefore, repurchase of a client's shares by the REIT itself is likely the only way to liquidate a client's interest. The REIT's repurchase plan provides clients the opportunity to liquidate a portion of their shares monthly; however, the REIT's board may modify or suspend the repurchase plan if it is in the best interests of the REIT and its stockholders. The board may also choose to terminate the repurchase plan if required by law or if it is in connection with a transaction that results in liquidity of shares of the REIT's common stock for shareholders. Additionally, the REIT is not obligated effect liquidity events. Any shares should be considered as having limited liquidity and, at times, the shares may be illiquid.
- There is no guarantee that the REIT will continue to make distributions, and distributions may be funded from sources other than cash flow from operations including, without limitation, the sale of assets, borrowing, offering proceeds or repayment of the REIT's real estate debt investments. Additionally, the REIT is not limited in the amounts it may pay from the above-noted sources.
- The REIT has no employees and is dependent on its adviser and sub-adviser to conduct its operations. The adviser and sub-adviser have conflicts of interest in the form of obligations to allocate investment opportunities among the REIT and other investment vehicles, the allocation of time of their investment professionals, and the substantial fees and expenses that we pay to the adviser and its affiliates.
- There are limits on the ownership and transferability of shares.
- If the REIT fails to qualify as a REIT and no relief provisions apply, the NAV and amount

of cash available for distribution to investors could materially decrease.

## Item 9 -- Disciplinary Information

MOSAIC submitted an Offer of Settlement ("Offer") to the Securities and Exchange Commission ("Commission") that the Commission accepted, and for which MOSAIC paid a monetary penalty and agreed to a Cease-and-Desist Order based upon the firm's failure to promptly file a required regulatory filing.

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

Neither MOSAIC nor any of its management persons is registered or has an application pending to register as a broker-dealer or a registered representative of a broker-dealer.

Neither MOSAIC nor any of its management persons is registered or has an application pending to register as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of any of the foregoing.

Donald L. DeMuth, the owner, chief compliance officer, and an investment adviser representative of MOSAIC, and is also a partner in DeMuth & Kaufman Professional Management Consultants, a professional management consulting and certified public accounting firm. DeMuth & Kaufman Professional Management Consultants provides consulting and accounting services for clients of MOSAIC in some instances. Donald L. DeMuth, as a partner in the firm DeMuth & Kaufman, has an interest in clients of MOSAIC choosing to work with DeMuth & Kaufman; however, that conflict is mitigated by the fact that the decision to work with DeMuth & Kaufman is the decision of the client alone. MOSAIC receives no compensation directly or indirectly from DeMuth & Kaufman.

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

MOSAIC has implemented a Code of Ethics that contains policies and procedures related to insider transactions, anti-money laundering, personal securities trading, gifts and entertainment, and outside business activities. MOSAIC will provide clients with a copy of the Code of Ethics upon request.

Neither MOSAIC nor any related person recommends to clients, or buys or sells for client accounts, securities in which MOSAIC or any related person has a material financial interest.

MOSAIC and its related persons may buy or sell securities that are also held by clients; however, neither MOSAIC nor any related persons may trade their own securities ahead of clients.

## Item 12 -- Brokerage Practices

MOSAIC does not have the discretion to select brokerage firms or to negotiate commission rates to be paid. Clients will designate the brokerage firm to use as the custodian of assets, as well as the brokerage firm that will handle the trading of securities. MOSAIC currently recommends the use of Fidelity Investments for this purpose.

MOSAIC has an arrangement with National Financial Services LLC and Fidelity Brokerage Services LLC (collectively, and together with all affiliates, "Fidelity") through which Fidelity provides MOSAIC with "institutional platform services." The institutional platform services include, among others, brokerage, custody, and other related services. Fidelity's institutional platform services that assist MOSAIC in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist back-office functions, recordkeeping and client reporting. All the benefits received by MOSAIC fall within the Safe Harbor of Section 28(e) of the Securities Exchange Act.

Fidelity generally does not charge its advisor clients separately for custody services but are compensated though: transaction fees charged for some mutual fund and exchange-traded fund purchases and sales; commissions charged by the custodian for transactions involving individual stocks; and a bid-and-ask spread on fixed-income securities. Fidelity provides access to many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. MOSAIC does not use client brokerage commissions to obtain research or other products or services, nor does MOSAIC receive any fees or commission from any brokerage or custodian that it recommends. MOSAIC is independently operated and owned and is not affiliated with Fidelity.

MOSAIC does not receive client referrals from Fidelity.

Clients are permitted to direct MOSAIC to utilize their desired brokers; however, if a client directs the use of a broker/dealer other than Fidelity, client's independent broker-dealer will determine the commission rate or fee schedule to apply in connection with the brokerage transactions. Each client that directs the use of a broker/dealer other than Fidelity should understand that the client will lose the ability of MOSAIC to effectively negotiate reduced commission rates. Trades effected other than with Fidelity are normally effected after the trades of clients that have selected Fidelity, primarily due to delays in communicating the orders to the appropriate broker/dealers.

MOSAIC endeavors to act in your best interests, but the recommendation that you maintain your assets in accounts at Fidelity may be based in part on the benefit to the firm of the availability of some products and services at no cost to us, or at reduced costs, and not solely on the nature, cost, or quality of custody and brokerage services provided by the brokers, and this may create a potential conflict of interest. Clients may, therefore, pay higher fees or commissions than those charged by other discount brokers; however, MOSAIC has selected Fidelity for their generally low fees relative to other large custodians. Additionally, MOSAICs prefers to recommend

custodians that possess significant size and financial resources, for purposes of enhanced safety of client funds. For all these reasons, the lowest cost custodian may not be recommended by MOSAIC.

Client purchases and sales of securities are not aggregated; however, given that MOSAIC recommends mainly no-load mutual funds aggregation would not generally affect the fees incurred by clients.

## Item 13 -- Review of Accounts

Client accounts are reviewed on at least a quarterly basis. MOSAIC provides each client with reports that include, among other things, the performance of their portfolio net of fees, the current value of all positions in the client's portfolio, and other information. Clients who engage MOSAIC to manage more than $1 million will receive financial planning services, including periodic updates, at no cost. Investment Advisory Representatives of MOSAIC conduct the reviews. Clients may request more frequent reviews, and they are encouraged to have reviews when there are significant changes in their personal circumstances, the general economy, or tax laws.

Economic and financial circumstances may trigger client reviews on an irregular basis in addition to the regular quarterly reviews.

On at least a quarterly basis each client receives an investment report from their custodian that includes a valuation of the client's holdings and transaction details.

## Item 14 -- Client Referrals and Other Compensation

MOSAIC and its related persons do not receive referral fees for client referrals or pay them to others.

## Item 15 -- Custody

MOSAIC does not take custody of clients' funds or securities except to the extent that it directly deducts its advisory fees from client accounts and because of third-party Standing Letters of Authorization ("SLOAs") on file with the clients' custodian. Clients authorize MOSAIC directly to deduct advisory fees from their account in the advisory agreement that they sign with MOSAIC. For those client accounts for which MOSAIC maintains a third-party SLOA on file with a qualified custodian, MOSAIC follows those safeguards noted in the SEC's No-Action Letter of February 21, 2017; and therefore, is not subject to a surprise annual audit for custody related to third-party SLOAs.

Clients will receive account statements at least quarterly from their custodian that holds and maintains client's investment assets detailing the asset in the account and any transactions, including fee deductions. MOSAIC urges clients carefully to review those statements and to compare them to any statements that they may receive from MOSAIC.

## Item 16 -- Investment Discretion

MOSAIC accepts either discretionary or non-discretionary authority to manage securities on the client's behalf. When a client grants MOSAIC discretionary authority, clients grant the firm the authority to select, purchase, and sell securities for their account, all without prior consultation. Clients receive advice specifically tailored to their investment objectives, risk, and any restrictions on the account.

## Item 17 -- Voting Client Securities

MOSAIC does not have and will not accept authority to vote client securities. Clients retain the authority to vote their securities. MOSAIC will advise clients who request advice on voting their proxy ballots. Clients retain the responsibility for receiving and voting proxies for all securities maintained in their accounts. Clients receive their proxies directly from their custodian.

MOSAIC will have no power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise, or monitor class action or other litigation involving client assets. Further, we will not offer or provide guidance on these matters, clients should contact the issuer or their legal counsel.

## Item 18 -- Financial Information

MOSAIC does not require or solicit prepayment of more than $1,200.00 in fees from clients six months or more in advance. There are no financial conditions that are reasonably likely to impair MOSAIC's ability to meet contractual commitments to its clients. MOSAIC has not been the subject of a bankruptcy petition at any time in the past ten years.