



## ITEM 1 - COVER PAGE

This Brochure provides information about the qualifications and business practices of Vestory, LLC. If you have any questions about the contents of this Brochure, please contact us at 800.386.3004. 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.

The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Vestory, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for Vestory LLC is 151858.

*Vestory Investment Advisory*  
1301 120th Avenue NE  
Bellevue, Washington 98005  
[www.vestory.com](http://www.vestory.com)  
800-386-3004

Vestory, LLC is a Registered Investment Advisor. Registration does not imply any level of skill or training.

Version date: February 23, 2015





# CLIENT BROCHURE SUMMARY

## **TYPE OF ADVISOR**

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Vestory is a fee-only investment advisory firm. We use only no-load, non-actively managed mutual funds to create broadly (and globally) diversified portfolios of stocks and high-quality bonds, based on the clients risk profile, needs, and situation. We attempt to strictly enforce client discipline and do not actively trade or time securities or markets. All of our advice is based on academic research including Modern Portfolio Theory, Efficient Market Hypotheses, Capital Asset Pricing Model, and the work done by Dimensional Fund's academic advisors.

## **HOW WE ARE PAID**

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We receive an annual fee from our clients based on a percentage of assets directly under Vestory's management. This fee starts at 0.90% and declines to 0.25%. For example, our annual fee on \$250,000 would be \$2,250, paid quarterly in \$562.50 increments. We NEVER collect commissions, trailing fees, incentive fees, or transaction fees. Our only compensation come directly from our clients.

## **WHO WE ADVISE**

more on page 7

Individual investors ERISA plans that meet certain investment minimums (depending on type of account) and who agree to maintain our disciplined investing approach, including regular rebalancing.

## **HOW WE RESEARCH**

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All of our advice is based on academic research including Modern Portfolio Theory, Efficient Market Hypothesis, Capital Asset Pricing Model, the work done by Dimensional Fund's academic advisors and many others, plus our own internal studies, research, and due diligence.

## **WHAT ARE THE RISKS**

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All investing involve risk! While we create massively diversified portfolios, securities prices do fall and you will likely suffer periodic losses in the value of your portfolio. Please carefully read the risk disclosures on pages 9 and 10.

## **TYPES OF INVESTMENTS**

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Vestory only uses no-load, low-fee passive mutual funds and, occasionally, high-quality individual bonds. To date our research has led us to use funds from two groups, Vanguard and Dimensional Fund Advisors (DFA). We do look for other, possibly superior products that meet of investment criteria.

## **PRODUCTS WE DON'T USE**

We *never* recommend the purchase of individual stocks, high-yield (junk) bonds, actively-managed mutual funds, loaded funds, funds with 12b-1 fees, hedge funds, or exotic investments of any kind.

## **WHO HOLDS ASSETS**

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Vestory never takes custody of your assets. Currently, our custodians are Charles Schwab, TD Ameritrade, and Scottrade. You should *never* write a check to (except for billed management fees) or transfer assets directly to Vestory or one of our employees.

## **ADDITIONAL INFORMATION**

Also included in this brochure are details on Vestory, our code of ethics, use of discretion, disciplinary action, proxy voting, financial information and much more.

## ITEM 2 - MATERIAL CHANGES

Since our last update Vestory has opened a hybrid automated/personal advisory, VestoryOne. As part of that, we have also added TD Ameritrade to our list of custodians with which we work. Please see Item 4 for more information.

We will ensure that you receive a summary of material changes, if any, to this and subsequent disclosure brochures within 120 days after our fiscal year ends. Our fiscal year ends on December 31 so you will receive the summary of material changes, if any, no later than April 30 each year. At that time we will also offer a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Chief Compliance Officer Tom Cock at 800.386.3004 or [tom@vestory.com](mailto:tom@vestory.com)

Additional information about Vestory is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with Vestory, LLC who are registered, or are required to be registered, as investment adviser representatives of Vestory, LLC.

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## ITEM 4 - ADVISORY BUSINESS

Vestory has been in business since October 2009 and is primarily owned by Principals Thomas C Cock and Don McDonald. Other members of Vestory's staff are also minority owners.

As of December 31, 2014, Vestory managed \$172,514,998 in client assets.

Vestory provides fee-only, discretionary portfolio management services to individual investors and retirement plans. Vestory offers two programs for investors; a full-service advisory model with a minimum investment of \$250,000 and a hybrid online advisory service, VestoryOne, with a minimum account size of \$5,000 in conjunction with a sub-advisor, Upside Advisors.

These services are based, in part, on the principles and tenets of Modern Portfolio Theory (MPT) as a means for building investment portfolios within a client's long-term investment goals. These services are tailored to the individual's investing objectives, risk tolerance and time horizon.

Vestory constructs model portfolios used as a starting point to determine individual investor needs and which demonstrate the historical risk and return of multiple asset class allocations. Vestory advisory services are designed to educate individual investors on the benefits of long-term investing through appropriate asset class allocations that match the individual's investing risk tolerance. That knowledge is applied in jointly developing an asset allocation that fits the individual's needs. It is then implemented and managed through a global investment portfolio, massively diversified across thousands of securities, with the strategy of providing a market-based return within each client's risk tolerance profile.

Vestory primarily recommends the use of no-load mutual funds and ETFs, like those offered by Dimensional Fund Advisors (DFA) and Vanguard which follow a low-cost, passive investment philosophy with low holdings turnover. DFA-sponsored funds in particular provide Vestory client access to institutional class passively-managed mutual funds not generally available to the investing public.

Vestory also may also provide advice on corporate debt securities, certificates of deposit, variable investment company products and government bonds. Vestory provides limited advice on individual equity securities (stocks), which present non-diversified risks that are generally difficult to quantify, due to their concentrated exposure to industry and company specific factors.

Vestory may also provide, when desired by the client, specific fixed income services such as direct investment in laddered fixed income securities with date-certain maturities. Such services are only offered when the size of the client's fixed income allocation provides benefit in holding date-certain instruments to better manage interest rate risk, fund planned account withdrawals, lower investment costs and address other relevant factors versus the allocation to fixed income mutual funds.

Vestory may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, rebalancing for over and underweighted asset classes in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client's risk tolerance.

Broad based asset allocation using passively-managed, low turnover investments is the primary way Vestory attempts to manage clients' investment risk while providing the returns that the investing markets provide.



Clients of Vestory's hybrid online service, VestoryOne complete an online personal risk tolerance assessment and provide additional information about their financial goals. Based on the information provided, the appropriate model portfolio is selected for the client using low cost exchange traded funds ("ETFs"), mutual funds, and other similar equity-related index funds, stocks, or investment products tailored to the client's specific needs. Information about the client's model portfolio is available on the online platform, which includes their investment style, objectives, and a list of ETFs and other investments with shares that are included in and traded through them. The client can also submit or modify risk preferences, investment objectives, investment size and any other restrictions for their accounts directly through the online platform. VestoryOne's sub-advisor will periodically rebalance client model portfolios based upon the client's individual needs, stated goals and objectives. VestoryOne clients will also have access to a Vestory advisor via electronic communications for investment education and portfolio concerns and questions. VestoryOne clients' assets are held at TD Ameritrade.

By way of an Investment Advisory Agreement, clients provide Vestory (and selected sub-advisors) written authority to manage their account investments on a discretionary basis. Clients may impose restrictions on investing in certain securities or types of securities. Such restrictions shall be included in the Investment Advisory Agreement. Clients may change or amend these restrictions at any time. All changes or amendments must be in writing.

In the course of providing discretionary investment advisory services, Vestory does not provide custodial or other such administrative services. AT NO TIME WILL VESTORY ACCEPT OR MAINTAIN CUSTODY OF CLIENT FUNDS OR SECURITIES. Custodial services are provided by an independent third party custodian.

See Item 15 of this brochure regarding Custody and Item 16 regarding Investment Discretion.

## ITEM 5 – FEES AND COMPENSATION

Pursuant to Vestory's Investment Advisory Agreement signed by each client, the client pays Vestory an annual advisory fee, which is collected quarterly in advance, based on the value of assets under management as of close of business on the last business day of the prior calendar quarter. The account balance on which Vestory calculates fee may vary slightly from the account custodial statement due to rounding or timing differences in how accrued interest is reported, for example (see Item 15 of this brochure regarding Custody). Client provides written authorization to withdraw fee directly from client's account. Fee withdrawal occurs at the start of the new calendar quarter and is performed by Vestory's back office administrator. Vestory sends client an informational invoice showing the amount of the fee, the value of client's asset on which the fee is based, and computation of the fee, according to the following schedule attached as Exhibit A to the signed Investment Advisory Agreement:

### Vestory Annual Advisory Fees

Assets Under Management	Annual Fee
Up to \$1,000,000	0.9%
\$1,000,000 to \$2,000,000	0.4%
Over \$2,000,000	0.25%



Investment accounts initiated or terminated during a calendar quarter will be charged a prorated Vestory advisory fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded to client, and any earned, unpaid fees will be due and payable to Vestory.

VestoryOne clients pay a flat advisory fee of 0.9% per year, regardless of account size. This fee is automatically debited from each VestoryOne client's account each month, in arrears, at a monthly rate of 0.075% (\$7.50 per \$10,000) of portfolio value.

Vestory's fees are non-negotiated. They are separate and distinct from expenses charged by mutual fund companies, which are described in each fund's prospectus and generally include an internal management fee and other fund expenses. A client may be able to invest in these products directly, without the services of Vestory. In that case, the client would not receive the services provided by Vestory which are designed, among other things, to assist the client in determining which products or services are most appropriate to each client's financial condition and investing objectives.

Clients are also responsible for any custodial fees and security transaction fees charged by the independent custodian and executing broker-dealer. These are also separate and distinct from Vestory's advisory fee. Vestory *does not* receive any portion of these third-party charges. Also, Vestory *does not* accept any commissions for the sale of securities or other investment products, including asset-based distribution fees from the sale of mutual funds.

The client is encouraged to review third-party fees, mutual fund fees and the fee charged by Vestory to fully understand total fees to be paid.

See Item 12 of this brochure for the factors Vestory considers in selecting or recommending custodians/ broker-dealers and determining the reasonableness of their charges.

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

Vestory does not charge performance-based fees of any kind. In addition, Vestory does not participate in any wrap fee programs.

## ITEM 7 – TYPES OF CLIENTS

Vestory provides portfolio management services to individuals, high-net-worth individuals and pension and profit sharing plans.

Vestory's minimum account size is \$250,000. This minimum may be waived from time to time, based on the needs of the client and the complexity of his or her situation.





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

### *Methods of Analysis and Investment Strategies*

Vestory services are based on long-term investment strategies incorporating the principles of Modern Portfolio Theory (MPT). Vestory's investment approach is firmly rooted in the belief that markets are "efficient" and that investor returns are determined principally by asset allocation decisions, rather than market timing or stock picking. Vestory recommends diversified portfolios, primarily through the use of passively managed, asset class mutual funds, which in some cases are not available to the investing public. Nonetheless, Vestory portfolio recommendations principally hold broadly-traded open end mutual funds and in some cases conservative date-certain fixed income securities to implement this investing strategy. Vestory may also periodically use Exchange Traded Funds (ETFs) to represent an asset class.

Although all investments involve risk, Vestory's investment recommendations seek to limit risk through broad diversification in global equity classes and as appropriate for each client, an allocation to conservative fixed income securities for the fixed income class. Vestory's investment philosophy is designed for investors who desire a buy and hold strategy, with five and even ten or more years of equity-investing time horizon. Vestory's approach also seeks to minimize the frequent trading of securities which typically decreases portfolio performance due to increased brokerage and other transaction and tax costs borne by clients. Investors who do not commit to a MPT philosophy may not achieve desired long-term results.

Clients may wish to hold or retain other types of assets as well, such as actively managed funds and individual stocks, for example. Vestory can offer advice regarding those various assets as part of its service. Advice regarding such assets may not generally involve asset management services, but may help to more generally assist the client with their particular needs. Vestory will emphasize the increased cost associated with trying to time the market through active management or in holding individual stocks where non-diversified risks are difficult to quantify due to concentrated exposure to specific industries and companies.

The investment strategies implemented by Vestory do not utilize securities classified as having significant or unusual risks, beyond that of the general domestic and international equity markets.

**Nonetheless, past performance does not guarantee of future returns. Investing in securities involves risk of loss that you, as the client, should be prepared to bear.**

Vestory relies on research from commercially available investment services, financial newspapers, periodicals and prospectuses. Vestory also receives research from Dimensional Fund Advisors, Vanguard, and from other consultants, including economists affiliated with Dimensional Fund Advisors (DFA). DFA provides historical market analysis, risk/return analysis and continuing education to Vestory. Vestory in turn, seeks to pass this information on, in an ongoing effort to educate and inform clients and prospects on prudent investing strategies and practices to better understand objective risk/return tradeoffs.

## *Analysis of a Client's Financial Situation*

In developing investment plans for clients, including the recommendation of an appropriate asset allocation, Vestory relies on the client's financial objective, current and estimated future resources, and their stated tolerance for risk. And in some cases, Vestory may use Monte Carlo simulation analysis, a standard statistical approach for dealing with uncertainty.

As with any method used to make projections into the future, there are several risks associated with such projections, which may result in client's not achieving their financial goals. These include, but are not limited to:

- The risk that expected future cash flows do not match those used in the analysis
- The risk that future rates of return fall short of historical levels or projected estimates
- The risk that market volatility exceeds historical levels or projected estimates
- The risk that inflation is greater than historical levels or projected estimates
- That government tax rates are higher than projected, which adversely impacts both taxable account performance and after-tax proceeds from deferred account withdrawals

## *Risk of Loss*

### **Please read this section carefully.**

All investments present the risk of loss of principal – the risk that the value of securities (mutual funds, ETFs and individual bonds), when sold or otherwise disposed of, may be less than the price paid for the securities. Even when the value of the securities when sold is greater than the price paid, there is the risk that the appreciation will be less than inflation. In other words, the purchasing power of the proceeds may be less than the purchasing power of the original investment.

The mutual funds and ETFs utilized by Vestory may include funds invested in domestic and international equities, including real estate investment trusts (REITs), corporate and government fixed income securities and commodities. Equity securities may include large capitalization, medium capitalization and small capitalization stocks. Mutual funds and ETF shares invested in fixed income securities are subject to the same interest rate, inflation and credit risks associated with the underlying bond holdings.

Among the riskiest mutual funds used in Vestory's investment strategies are U.S. and International small capitalization and small capitalization value funds, emerging markets funds, and commodity futures funds. Conservative fixed income securities have lower risk of loss of principal, but most bonds (with the exception of Treasury Inflation Protected Securities or TIPS) present the risk of loss of purchasing power through lower expected return. This risk is greatest for longer-term bonds.

Certain funds utilized by Vestory may contain international securities. Investing outside the United States involves additional risks, such as currency fluctuations, periods of illiquidity and price volatility. These risks may be greater with investments in emerging countries.

More information about the risks of any particular market sector can be reviewed in representative mutual fund prospectuses managing assets within each applicable sector.

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

It is the very nature of this future loss uncertainty that produces higher rates of return over time. The key words are "over time." Meaning that in the course of pursuing a higher return, one has to be able to handle inevitable short-term volatility surprises. Such volatility translates to the risk of locked-in investment loss if money must be withdrawn in a down market, which is precisely what makes investing time horizon so critically important.

To make investing more comfortable, volatility must be reduced. One way is to accept much lower rates of return. But lower rates of return expose the investor to inflation risk.

A better way to reduce volatility is to invest consistent with the tenants of MPT and passivity. Invest passively in non-correlating assets classes across global markets moving in different directions over time.

Diversification works to eliminates non-compensated specific industry and company risk, leaving only inherent market risk with which to contend.

Therein lies the key to successful investing:

- Consistent and methodical saving to fund investment
- Allow plenty of investing time horizon as a means to ignore inherent market volatility.
- Build a massively diversified portfolio of worldwide holdings constructed to your personal volatility/ risk tolerance.
- Ignore the market's inherent volatility
- Accepting the market's inherent volatility is ultimately what earns you a higher rate of return over time.

## ITEM 9 – DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Vestory or the integrity of Vestory's management. Vestory has never been subject to regulatory, disciplinary or legal action and only one person affiliated with Vestory has been the subject of regulatory or disciplinary action.

## ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Mr. Cock, Mr. McDonald and all other Vestory representatives providing advice to clients are not registered as a broker-dealer or as representatives of a broker-dealer. Mr. Cock, Mr. McDonald and all other Vestory representatives providing advice to clients are not registered as a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor.

## ITEM 11 – CODE OF ETHICS

Vestory has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser. In addition, the Code of Ethics governs personal trading by each employee of Vestory deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of Vestory are conducted in a manner that avoids any actual or potential conflict of interest between such persons and clients of Vestory.

Vestory does not recommend that clients buy or sell any securities in which a related person to Vestory has a material interest.

When Vestory representatives buy or sell securities for themselves that they also recommend to clients, they will comply with Vestory's Code of Ethics and never put themselves in a position to benefit before clients.

When Vestory representatives are buying and selling securities for themselves at or around the same time as clients, and the securities are not open-end mutual funds or broadly-based Exchange Traded Fund indexes, Vestory representatives will trade client positions first, before they trade their own.

Clients and prospective clients may request a copy of Vestory's Code of Ethics by contacting Chief Compliance Officer Tom Cock at 800.386.3004 or [Tom@Vestory.com](mailto:Tom@Vestory.com).

## ITEM 12 – BROKERAGE PRACTICES

Vestory selects the custodians/broker-dealers it recommends to clients based on trading access to investment securities, reliable trade execution, competitive fees, quality of custodial services, customer service ease of access, and reputation in the industry.

Vestory does not receive research or other products or services (better known as “soft dollar benefits”) in exchange for clients paying higher fees and commissions than those charged by other custodians/broker-dealers. Vestory will never charge a premium or commission on transactions, beyond the actual cost imposed by custodian/broker-dealer.

Vestory will not receive a referral fee or client referrals from custodial in exchange for clients using a recommended custodian/broker-dealer.

Although Vestory allows clients to direct brokerage, Vestory may be unable to achieve most favorable execution of client transactions if client chooses to direct brokerage.

Additionally, client may pay higher brokerage commissions or received less favorable prices if client chooses to direct brokerage.

Vestory does not aggregate (i.e. block) trade purchases or sales across multiple client accounts because selected custodians/broker-dealers do not provide that capability.

## ITEM 13 – REVIEW OF ACCOUNTS

Accounts are reviewed every six months and rebalanced when warranted. Reviews are conducted by Vestory Investment Advisor Representative and in some cases by Mr. Cock.

Rebalancing or re-optimizing can also be triggered in connection with the following events:

- Account deposits and withdrawals
- Changes in client's financial situation or risk tolerance (retirement, change or loss of employment, physical relocation, inheritance, unexpected financial burden or windfall, change in marital status, tax law changes impacting client, etc)
- material market shifts, major economic, or political events

Rebalancing is accomplished by reallocating assets to original allocation target percentages. Re-optimizing involves setting new asset allocation target percentages.

The client will receive written or electronic statements at least quarterly from their account custodian. Vestory also provides quarterly portfolio performance reports.

In addition, the client will receive other supporting reports from Mutual Funds, Trust Companies or Custodians, Insurance Companies, Broker/Dealers and others who are involved with client accounts. See Item 16 of this brochure regarding Custody.

It is the client's responsibility to notify their Vestory Investment Advisor Representative whenever materials changes in their financial situation or risk tolerance warrant a change in their investment plan and/or asset allocation.

## ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

Vestory does not receive any economic benefit, directly or indirectly from any third party for advice rendered to Vestory clients. Vestory does not pay client referrals fees, directly or indirectly, to any third parties.

## ITEM 15 – CUSTODY

At no time will Vestory does take custody of a client account or accept or maintain custody of client funds or securities. Custodial services are provided by an independent third party Custodian.

Clients will receive statements at least quarterly from the custodian holding their investment assets. Vestory urges clients to carefully review such statements and compare these custodial records with the quarterly reports provided by Vestory. Vestory reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.



## ITEM 16 – INVESTMENT DISCRETION

By way of the Investment Advisory Agreement, client grants Vestory written limited power of attorney to select the identity and amount of securities to be bought and sold in their account. In all cases, this discretion is exercised in a manner consistent with the investment objectives for the particular client account.

When selecting securities and determining amounts, Vestory observes any limitations imposed by client. Such limitations shall be included in the Investment Advisory Agreement. Client may change or amend these limitations at any time. All changes or amendments must be provided to Vestory in writing.

## ITEM 17 – VOTING CLIENT SECURITIES (PROXY VOTING)

Vestory does not accept the authority to and does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Also, Vestory does not give any advice or take any action with respect to the voting of these proxies. Clients and Vestory agree to this in writing pursuant to the signed Investment Advisory Agreement.

Clients will receive applicable proxies directly from the issuer of securities held in clients' investment portfolios. Clients should direct all proxy questions to the issuer of the security.

Note that Vestory will neither advise nor act on behalf of clients in legal proceedings involving companies whose securities are held or previously were held in clients' account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements.

## ITEM 18 – FINANCIAL INFORMATION

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Vestory's financial condition.

Vestory has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding. However, one of the company principal's, Thomas C. Cock, filed for personal Chapter 13 bankruptcy protection on October 5, 2011. He subsequently withdrew the petition on November 8, 2011 and it was dismissed by the court.

## ITEM 19 – REQUIREMENTS FOR STATE-REGISTERED ADVISORS

Registered investment advisers are required to provide biographical information on those in the organization providing investment advice. Below are disclosures (Form ADV Part 2B Brochure Supplements) for individuals providing investment advice to Vestory clients.





Form ADV Part 2B

# VESTORY INDIVIDUAL DISCLOSURE BROCHURE

## **THOMAS C. COCK**

*Principal & Chief Compliance Officer*

1301 120th Avenue NE

Bellevue, Washington 98005

[www.vestory.com](http://www.vestory.com)

800-386-3004

**Version date: February 23, 2014**

This Brochure Supplement provides information about Thomas C. Cock that supplements the Vestory LLC Brochure. You should have received a copy of that Brochure. Please contact Chief Compliance Officer, Thomas C Cock if you did not receive Vestory's Brochure or if you have any questions about the contents of this supplement.

Additional information about Thomas C. Cock is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). His Individual CRD number is 434 5448..

**VESTORY**

Form ADV Part 2B - Supplemental Disclosure Brochure for Thomas C. Cock

## EDUCATION, BACKGROUND & BUSINESS EXPERIENCE

Thomas C. Cock (Principal and Chief Compliance Officer). Born 1958. Mr. Cock graduated from Whitman College with a Bachelors of Arts degree in History-American Studies, and completed all coursework for his Masters in Public Administration at The Evergreen State College. From 1998 to August, 2009 Mr. Cock acted as Director of Education and Marketing for Merriman, Inc.

## DISCIPLINARY INFORMATION

Mr. Cock has not been involved in any financial industry disciplinary or legal proceeding.

## OTHER BUSINESS ACTIVITIES

None

## ADDITIONAL COMPENSATION

Other than this regular salary and bonuses, Mr. Cock receives no other compensation or economic benefit from others in exchange for providing investment advice to Vestory clients and client prospects.

## SUPERVISION

Mr. Cock is Chief Compliance Officer. His telephone number is 800-386-3004.

Mr. Cock monitors the advice provided to clients by Vestory Investment Advisors by regularly reviewing client portfolios, and supervising recommendations made to clients.

## REQUIREMENTS FOR STATE REGISTERED ADVISERS

Mr. Cock has not been found liable for any arbitration claims or any type of self-regulatory organization or administrative proceeding. Mr. Cock did file for Chapter 13 protection on October 5, 2011. He subsequently withdrew the petition on November 8, 2011 and it was dismissed by the court.



Form ADV Part 2B

# VESTORY INDIVIDUAL DISCLOSURE BROCHURE

**DONALD A. McDONALD**

*Principal*

402 Iris Street

Celebration, FL 34747

[www.vestory.com](http://www.vestory.com)

800-386-3004

**Version date: February 23, 2014**

This Brochure Supplement provides information about Donald A. McDonald that supplements the Vestory LLC Brochure. You should have received a copy of that Brochure. Please contact Chief Compliance Officer, Thomas C Cock if you did not receive Vestory's Brochure or if you have any questions about the contents of this supplement.

Additional information about Donald A. McDonald is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). His Individual CRD number is 114 1451.



## EDUCATION, BACKGROUND & BUSINESS EXPERIENCE

Donald McDonald (Principal). Born 1956. Mr. McDonald will also continue to serve as President of PastPresent Incorporated, a non-investment related company. He has been there since 1991. From 2003 to 2009 Mr. McDonald worked as an Independent Contractor for Merriman Capital Management, as an Investment Educator and Investment Advisor Representative. From 1988 he was the host of a nationally-syndicated money talk radio show. From 1984-1987 he was a registered representative with Dean Witter (now part of Morgan Stanley) & Boettcher & Co.

## DISCIPLINARY INFORMATION

Mr. McDonald has not been involved in any financial industry disciplinary or legal proceeding.

## OTHER BUSINESS ACTIVITIES

Mr. McDonald serves as President of PastPresent Incorporated, a non-investment related company.

## ADDITIONAL COMPENSATION

Other than this regular salary and bonuses, Mr. McDonald receives no other compensation or economic benefit from others in exchange for providing investment advice to Vestory clients and client prospects.

## SUPERVISION

Mr. McDonald is supervised by Vestory CCO, Thomas C. Cock. Mr. Cock's telephone number is 800-386-3004.

Tom monitors the advice provided to Vestory clients by Mr. McDonald by regularly reviewing client portfolios, and supervising recommendations made to clients.

## REQUIREMENTS FOR STATE REGISTERED ADVISERS

Mr. McDonald has not been found liable for any arbitration claims or any type of self-regulatory organization or administrative proceeding. He has also never been involved in or file a bankruptcy petition.



Form ADV Part 2B

# VESTORY INDIVIDUAL DISCLOSURE BROCHURE

## **MICHAEL DEAN TAYLOR**

*Investment Advisor Representative*

5933 Win Sivers Drive, Suite 241

Portland, OR 97220

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800-386-3004

**Version date: February 23, 2014**

This Brochure Supplement provides information about Michael Dean Taylor that supplements the Vestory LLC Brochure. You should have received a copy of that Brochure. Please contact Chief Compliance Officer, Thomas C Cock if you did not receive Vestory's Brochure or if you have any questions about the contents of this supplement.

Additional information about Michael Dean Taylor is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). His Individual CRD number is 101 8877.



## EDUCATION, BACKGROUND & BUSINESS EXPERIENCE

Michael Dean Taylor (Investment Advisor Representative). Born 1952. Graduated with a Bachelor of Arts in Business Administration and Christian Education from Oral Roberts University in 1976 he also attended the University of Oregon from September 1970 through May 1972. Western Regional Director of Wealth Management, LLC, 10/2011 to present . Regional Vice President for CCM Partners 02/2010 to 07/2011, Sales manager for TLG Advisors, Inc. 09/2009 to 02/2010, Vice President of Sales for MG Trust, LLC 03/2008 to 06/2009.

## DISCIPLINARY INFORMATION

Mr. Taylor has not been involved in any financial industry disciplinary or legal proceeding.

## OTHER BUSINESS ACTIVITIES

Mr. Taylor is an Investment Advisor Representative for Wealth Management LLC and Western Regional Director for Retirement Plan Consultants LLC. He is also independently licensed to sell fixed insurance products.

## ADDITIONAL COMPENSATION

Other than this regular salary and bonuses, Mr. Taylor receives no other compensation or economic benefit from others in exchange for providing investment advice to Vestory clients and client prospects.

## SUPERVISION

Mr. Taylor is supervised by Vestory CCO, Thomas C. Cock. Mr. Cock's telephone number is 800-386-3004.

Mr Cock monitors the advice provided to Vestory clients by Mr. Taylor by regularly reviewing client portfolios, and supervising recommendations made to clients.

## REQUIREMENTS FOR STATE REGISTERED ADVISERS

Mr. Taylor has not been found liable for any arbitration claims or any type of self-regulatory organization or administrative proceeding. He has also never been involved in or file a bankruptcy petition.



Form ADV Part 2B

# VESTORY INDIVIDUAL DISCLOSURE BROCHURE

## **WILLIAM B. HIGGINS**

*Investment Advisor Representative*

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Bellevue, Washington 98005

[www.vestory.com](http://www.vestory.com)

800-386-3004

**Version date: February 23, 2014**

This Brochure Supplement provides information about William Higgins that supplements the Vestory LLC Brochure. You should have received a copy of that Brochure. Please contact Chief Compliance Officer, Thomas C Cock if you did not receive Vestory's Brochure or if you have any questions about the contents of this supplement.

Additional information about William Higgins is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). His Individual CRD number is 615 8964.





## EDUCATION, BACKGROUND & BUSINESS EXPERIENCE

William Higgins (Investment Advisor Representative). Born 1955. Graduated with a Bachelor of Science in Civil Engineering from Iowa State University. He also received an MBA and Masters in Industrial Engineering from University of Arizona. Previously, Mr. Higgins was a senior project engineer with Inca Engineers from 2005-2011.

## DISCIPLINARY INFORMATION

Mr. Higgins has not been involved in any financial industry disciplinary or legal proceeding.

## OTHER BUSINESS ACTIVITIES

None

## ADDITIONAL COMPENSATION

Other than this regular salary and bonuses, Mr. Higgins receives no other compensation or economic benefit from others in exchange for providing investment advice to Vestory clients and client prospects.

## SUPERVISION

Mr. Higgins is supervised by Vestory CCO, Thomas C. Cock. Mr. Cock's telephone number is 800-386-3004.

Mr. Cock monitors the advice provided to Vestory clients by Mr. Higgins by regularly reviewing client portfolios, and supervising recommendations made to clients.

## REQUIREMENTS FOR STATE REGISTERED ADVISERS

Mr. Higgins has not been found liable for any arbitration claims or any type of self-regulatory organization or administrative proceeding. He has also never been involved in or file a bankruptcy petition.



Form ADV Part 2B

# VESTORY INDIVIDUAL DISCLOSURE BROCHURE

**KIM MAUREEN MILLER**  
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**Version date: February 23, 2014**

This Brochure Supplement provides information about William Higgins that supplements the Vestory LLC Brochure. You should have received a copy of that Brochure. Please contact Chief Compliance Officer, Thomas C Cock if you did not receive Vestory's Brochure or if you have any questions about the contents of this supplement.

Additional information about Kim Miller is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Her Individual CRD number is 448 8984.



## EDUCATION, BACKGROUND & BUSINESS EXPERIENCE

Kim Miller (Investment Advisor Representative). Born 1956. Bachelor of Arts in Microbiology and Masters in Business Administration, University of Kansas, Certified as a Training Specialist, Adult Learning, University of Washington. Project Management Professional (PMP) designation from the Project Management Institute. Project Manager at Tapfin/Manpower from 08/2012 to 05/2013. Sole Proprietor of Kim Miller dba Identrac, where she has been since 01/2003.

## DISCIPLINARY INFORMATION

Ms. Miller has not been involved in any financial industry disciplinary or legal proceeding.

## OTHER BUSINESS ACTIVITIES

Sole Proprietor of Kim Miller dba Identrac, a non-investment related company. She is also independently licensed to sell insurance products.

## ADDITIONAL COMPENSATION

Other than this regular salary and bonuses, Ms. Miller receives no other compensation or economic benefit from others in exchange for providing investment advice to Vestory clients and client prospects.

## SUPERVISION

Ms. Miller is supervised by Vestory CCO, Thomas C. Cock. Mr. Cock's telephone number is 800-386-3004.

Mr. Cock monitors the advice provided to Vestory clients by Ms. Miller by regularly reviewing educational & marketing materials, and contacts with clients.

## REQUIREMENTS FOR STATE REGISTERED ADVISERS

Ms. Miller has not been found liable for any arbitration claims or any type of self-regulatory organization or administrative proceeding. He has also never been involved in or filed a bankruptcy petition.



Form ADV Part 2B

# VESTORY INDIVIDUAL DISCLOSURE BROCHURE

## **JERED B. SKOUSEN**

*Investment Advisor Representative*

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**Version date: November 14, 2014**

This Brochure Supplement provides information about William Higgins that supplements the Vestory LLC Brochure. You should have received a copy of that Brochure. Please contact Chief Compliance Officer, Thomas C Cock if you did not receive Vestory's Brochure or if you have any questions about the contents of this supplement.

Additional information about Jered B. Skousen is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). His Individual CRD number is 513 4979.



## EDUCATION, BACKGROUND & BUSINESS EXPERIENCE

Jared B. Skousen (Investment Advisor Representative). Born 1970. Master's of Business Administration, University of Phoenix, 2003. Bachelor's of Science, Brigham Young University, 1993. Maverick Advertising, CFO, 03/2012 to Present; National Instruments, Area Sales Manager, 01/1994 to Present, Investment of AADI, LLC: 10/07 to present. I am 75% owner/member, Next Phase Manufacturing, LLC: 10/12 to present. I am 25% owner/member Healers Art, LLC: 9/13 to present. owner/member.

## DISCIPLINARY INFORMATION

Mr. Skousen has not been involved in any financial industry disciplinary or legal proceeding.

## OTHER BUSINESS ACTIVITIES

Mr. Skousen currently serves as CFO for Maverick Advertising and Area Sales Manager for National Instruments, both non-investment related businesses.

## ADDITIONAL COMPENSATION

Other than this regular salary and bonuses, Mr. Skousen receives no other compensation or economic benefit from others in exchange for providing investment advice to Vestory clients and client prospects.

## SUPERVISION

Mr. Skousen is supervised by Vestory CCO, Thomas C. Cock. Mr. Cock's telephone number is 800-386-3004.

Mr. Cock monitors the advice provided to Vestory clients by Mr. Skousen by regularly reviewing educational & marketing materials, and contacts with clients.

## REQUIREMENTS FOR STATE REGISTERED ADVISERS

Mr. Skousen has not been found liable for any arbitration claims or any type of self-regulatory organization or administrative proceeding. He has also never been involved in or filed a bankruptcy petition.