

Code of Ethics

PDM Investment Services is a Registered Investment Advisor acting as a fiduciary under ERISA code, putting client's interest first. PDM Investment Services acts as an independent investment advisor with strong fiduciary responsibilities. We strive to comply with applicable laws and regulations governing our practices. We put the client's interests first and act in good faith. We do not receive any compensation that is contingent on any client's purchase or sale of a financial product.

PDM Investment Services, LLC is a Registered Investment Advisor with the Exchange Commission of the State of Michigan. For our complete brochure see our Firm Brochure Form ADV 2. All clients will receive a copy of this form from PDM Investment Services annually. Additional information about PDM Investment Services, LLC or Philip Michalek is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for PDM Investment Services, LLC is 155217.

Strategy

We do not use risky strategies like derivatives, margin, options, shorting stocks, leverage and penny stocks. We only use strategies and invest in securities we would personally invest in for ourselves. PDM Investment Services practice a pro-investor structure offering independent advice, open architecture, transparency, liquidity and low cost solutions. The client's portfolio transactions and holdings are accessible to them thru their custodial account.

Service to Other Clients

PDM Investment Services purchases recommended securities for themselves and client portfolios. PDM Investment Services has discretionary managed accounts that may buy or sell the same securities listed in our newsletter before or after they are recommended. Managed accounts own many, but not necessary all, recommended securities depending on the size of their account, goals and objectives and risk level.

Trading Error

Trading error is when the unintended security or amount is executed during a trade. In the event a trading error occurs in your portfolio we will restore your account to the position it should have been in had the trading error not occurred. The price change and transaction fees will be used to calculate the amount. The difference will be deducted from the next portfolio management quarterly fee. If a trade error results in a profit, you will keep the profit.

Trading Frequency

Our portfolio that invests in individual stocks has a higher frequency of trades. Higher trading frequency involves higher transaction costs and tax consequences. Most of our mutual fund purchases are long-term purchases of over one year.

Errors and Omission

The opinions and analysis are based on sources believed to be reliable and written in good faith, but no representation or warranty, expressed or implied, is made as to their accuracy, completeness, timeliness, or correctness. Neither we nor our information providers shall be liable for any errors or inaccuracies.

Information Sources & Forward Looking Statements

PDM Investment Services uses research material prepared by others including newspapers, newsletters, on-line services, timing services and company press releases. All market, mutual fund and index performance data presented in the newsletter is available at www.morningstar.com. Other information sources are disclosed in the content of the article. Research and data used in our ratings, analysis, newsletter, plans, performance analysis and education include: Morningstar, Barron's, Schwab, Hays, Dow Theory Forecasts, www.bea.gov, Bigcharts.com, Stockcharts.com, Manifest Investing, Investment Advisory Service, Fidelity Monitor, AAll and Timer Digest. Company news sources are businesswire.com, zacks.com, marketwatch.com, dowjones.com thru Morningstar.com and company websites.

Investment Performance and Risk of Loss & Responsibility

PDM Investment Services does not in any way guarantee the portfolio from loss, nor guarantee any minimum investment performance for client portfolios. Investing in securities involves risk of loss that clients should be prepared to bear. PDM Investment Services shall be responsible only for the satisfactory performance of all duties expressly assumed. Past performance is no assurance of future results. All investments involve individual security risk and market risk. Recommendations and advice are given with the understanding that the client assumes all risks involved. Always consider investment objectives and risk before investing. Investing in individual stocks generally carries more risk than diversified mutual funds. It is not recommended to invest more than 3% of a portfolio into any individual stock.

Confidentially

All client information is considered strictly confidential and will not be divulged without specific authorization of the client or if allowable by law. PDM Investment Services and its employees have an obligation to keep all information about clients (including former clients) in strict confidence, including a client's identity (unless the client consents in writing), a client's financial circumstances, a client's securities holdings, and advice furnished to a client by the firm. We restrict access to non-public personal information and maintain physical and electronic safeguards to guard your personal information.

E-mail messages are sent primarily to provide information related to our services. This includes notifications when a new newsletter or alert is sent or posted on our website. E-mails will also be sent informing subscribers of any material changes or relevant facts relating to the use of our service. We neither rent nor sell your e-mail address to anyone. We may also send e-mails to current and former subscribers announcing new services, promotions or special offers. If you do not wish to receive these e-mails, please contact us and you will be removed from our mailing list.

Our fginvestor.com website is a secure site that uses Secure Sockets Layer (SSL) software that encrypts the information, such as credit card numbers that you input. By using this site, you agree to our use of your user information as described in this privacy policy. As we add new technology and new services, we will update our privacy policy. We encourage you to look to this policy on a regular basis for our most current privacy policy practices.

Marketing and Internet Presence

Our website, www.fginvestor.com is not intended to offer investment advice and would only offer advice if registered in that state. The website is designed for product information and posting of the Focused Growth Investor newsletter, alerts, and investor education. The advisor also has a presence on LinkedIn. We have limited marketing campaigns and most of our new clients come from referrals.

Cyber Security

Our computers run virus protection or Apple iOS virus protection updated real time. Net Gear Router has firewall protection and is secured. All trades are made on a secured Wi-Fi or telephone. Files are backed up daily and stored in the secure iCloud. Files containing client personal information such as social security number and account number are securely stored off-line in secure paper files. Email is hosted on a Comcast server. Desktop, laptops and smartphone emails are cleared of sensitive documents quickly.

All documents are sent to TD Ameritrade thru a secure portal. Account access with a login, password and unique one-time token number for TD Ameritrade Advisor Services and Schwab. See TD Ameritrade Advisor Services and Schwab security policy. TD Ameritrade will always notify you of check requests, distributions, transfers and personal information changes by email or post card if no email.

A cyberattack or office disaster would not have any significant impact on portfolio management services due to the custodian arrangement and the file backup process. Portfolio management does not require a specific office computer. We could be back up and running in a few days or until TD Ameritrade is back up and running.

Steps you should take with your personal information and accounts

Passwords

- Verify your bank, brokerage, credit card, retail, computer, router and phone are secured with a strong password using capital and small letters, numbers and symbols. Change passwords often.
- Add two-factor authentication for all financial websites. (Login, password, text code)
- Never use your social security number as a password.

Computer

- Make sure your computers are running virus protection software and are always updating.
- Never access accounts or make purchases from a laptop or phone when on a public unsecured Wi-Fi.
- Do not respond with personal information to any popup on your computer, mail, email or phone request. Always call your contact at your institution before you give information.
Go to the official company website and call their support number.
- Do not open attachments or click on links of suspicious emails or emails without an unsubscribe option.
- Never send an email with personal information in the title or body content.
- Only enter your personal information on secure websites that start with https and not http.

Statements

- Monitor your bank, credit card and brokerage accounts online and your statements on a regular basis.

Financial Industry Activities, Affiliations and Brokerage Practices

PDM Investment Services and Philip Michalek are not actively engaged in business other than giving investment advice. There is not a general partner or any partnership in which clients are solicited to invest. PDM Investment Services and Philip Michalek currently do not have any arrangements or are not affiliated with any organization such as a broker-dealer, investment-company, bank, law firm, insurance company or another investment advisor.

PDM Investment Services is currently not affiliated with any broker, but suggests low cost on-line brokerage services to clients. The factors considered when selecting a broker are on-line stock and mutual fund trading, trading costs, number of mutual funds offered, reliability, execution speed, overall satisfaction, access to local branches and research. PDM Investment Services does not use research offered by brokerage firms in its clients' accounts.

All trading costs are the same for all clients with the same broker. Trading costs vary between brokers. We do not receive any compensation that is contingent on any client's purchase or sale of a financial product. The advisor does not receive any compensation from the securities selected.

Terms of Use

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Performance Calculations

Performance calculations are updated annually and are verified by Alpha Performance Verification Services. The performance graph is updated monthly and verified annually. For a copy of the Independent Verifier Reports, visit our website and click on the link on the home page. The performance displayed for the Diversified Mutual Fund & Sector Portfolio – Moderate is the performance of the Actual Account of Philip Michalek at a moderate risk level. This account represents the most common account of clients with a moderate risk tolerance.

- Portfolio returns include dividends, distributed capital gains, transaction costs* and other custodial or brokerage expenses. Dividends received by the portfolios are reinvested in same security that issued the dividend or cash into the portfolio or other securities to get to the recommended asset allocation.
- Performance is calculated without our portfolio management fee and with a portfolio management fee of 0.7% annually for an average household portfolio of \$565,000 Assets Under Management (AUM). Portfolio management fees vary from 1.0% of \$100,000 AUM to 0.5% of \$1,500,000 AUM.
- The Diversified Mutual Fund & Sector Portfolio has not received or distributed cash to this point. All realized and unrealized profits and losses remain in the portfolio. In the future, the portfolio may receive or distribute cash, which will be included in calculating returns.
- The portfolios are rebalanced as often as monthly and at least annually depending on investment recommendations of the Focused Growth Investor Newsletter. The portfolio is valued as of the last trading day of each month.
- Returns are calculated using a time-weighted methodology. Annual returns are calculated by linking the monthly returns.
- It should not be assumed that all clients follow the Focused Growth Investor Portfolios. The performance of a specific client or newsletter subscriber's account may vary substantially from the displayed performance results. Client investment results may vary from the model due to the timing of implementation, implementation transaction fees, portfolio size, risk profile, account contributions or withdrawals and actual investments used in the portfolio.
- Performance returns of the Morningstar Moderate Target Risk are shown for general industry-wide comparative purposes and are available on www.morningstar.com. It should not be assumed that the benchmark represents a similar investment strategy or asset class as the Focused Growth Investor Portfolios.
- Performance returns of the T. Rowe Price Equity Index 500 Fund are shown for general industry-wide comparative purposes. It should not be assumed that the benchmark represents a similar investment strategy or asset class as the Focused Growth Investor Portfolios.

Past performance is no guarantee of future results. Market and economic conditions have the largest impact on a portfolio's performance. Strategies can go in and out of favor in different market environments. Some periods will see losses. Investment strategies evolved over the past and will continue to evolve in the future. Since the time period displayed is historical, there can be no assurance that future results achieved by clients in the future will resemble those represented by the actual or model portfolios. Our investment strategies started in 2003 and continue to evolve over time. The improvements in investment strategies over time may alter future results. TD Ameritrade brokerage costs for a stock transaction is \$7 per trade. In a stock portfolio with 50 round trip stock trades, it would cost \$700 or 0.7% for a \$100,000 portfolio annually. TD Ameritrade brokerage costs for a mutual fund transaction is \$17 per trade for about 50% of the funds we purchase and \$0 for the others. In a mutual fund portfolio with 20 mutual fund trades it would cost \$170 or 0.2% for a \$100,000 portfolio annually. In larger portfolios, transaction fees become even less significant.

Portfolio Specification Calculations

The portfolio specifications are calculated using the annual returns of our portfolios and their benchmarks.

Performance (Alpha)

Alpha is the annual performance of the portfolio greater than its benchmark. Alpha is calculated by taking the average of the annual performance of the years reviewed for the portfolio than doing the same for its benchmark. The portfolio average is then subtracted from the benchmark average. A positive number is the percent the portfolio outperformed the benchmark each year annualized.

Performance Consistency

The number of years the portfolio outperformed the benchmark divided by the total number of years reviewed. For close years, a 0.5 credit is used in the calculation.

Risk (Standard Deviation-Variation from the mean)

The Microsoft excel formula STDEV.P for the years reviewed.

Risk Adjusted Return (Sharpe Ratio)

(Average return of the years reviewed minus the 90 Day T-Bill rate) divided by the standard deviation all multiplied by 100. The Microsoft excel formula AVERAGE is used for the years reviewed. The 90 Day T-Bill rate over the past 11 years has been 1.5%.

Maximum Drawdown

The year with the most negative return over the years reviewed is the maximum downdraft.

Portfolio Management Cost

The average annual portfolio management fee for the portfolios managed by PDM Investment Services.

Custodian Insurance

Cash protection is \$250,000 FDIC plus \$1 million from private insurance in TD Ameritrade Bank.
Equity protection is \$500,000 SIPC plus \$25 million from private insurance at TD Ameritrade.

Fee Schedule

Portfolio Management

PDM Investment Services will receive an asset-based fee on a quarterly basis for investment supervision and management of the Portfolio. Advisory fees for Portfolio Management are based on the market value of assets under management at the beginning of each quarter. Fees are payable on a quarterly basis after each quarter.

The minimum requirement for portfolio management is \$200,000 per family. We may waive the minimum if the household appears to have significant potential for increasing their assets under management. The \$200,000 minimum for portfolio management may be waived for portfolio management client's children.

For new clients, fees are prorated for the time the account was active within the quarter.

For existing clients, the fee percent is reviewed quarterly and adjusted to schedule based on the assets under management at the beginning of the quarter. The fee structure is not prorated for money movements during the quarter.

Money added to a portfolio during the quarter will not be prorated and will be adjusted in at the beginning of the next quarter.

Money removed from a portfolio during the quarter, will not be adjusted out of that quarter's fees unless the amount is significant. (Significant is if the adjustment of the withdrawal results in \$100 or more reduction in fee)

If assets under management drop pushing the client into a higher fee bracket from significant withdrawals and assets are expected to stay in this higher fee bracket for at least 12 months, the client fee will be adjusted for the next quarter.

If the assets under management drop pushing the client into a higher fee bracket from a market decline or regular retiree income withdrawals, the fee will remain the same.

The client is responsible for brokerage transaction fees and any other charges incurred by the custodian on the client's behalf. Clients are billed quarterly and can pay by check or custodian deduction. Clients are sent an invoice 7 days before the fee is processed with their credit card or deducted from their account by the custodian. This gives the client a chance to review the calculation. The quarterly fee is 25% of the annual fee listed below. The fee schedule is effective for new clients after December 31, 2013. Fees may vary from schedule for prior clients. The fee schedule below is for combined family assets under management.

ASSETS UNDER MANAGEMENT	TAXABLE ACCOUNTS IRA ACCOUNTS	401 (k) ACCOUNTS FOR CURRENT TAXABLE/IRA CLIENTS WITH AT LEAST \$200,000 AUM	401 (k) ACCOUNTS ONLY ACCOUNT
\$100,000 to \$199,000	4.0%	0.70%	0.8%
\$200,000 to \$299,000	0.9%	0.60%	0.7%
\$300,000 to \$499,000	0.8%	0.50%	0.6%
\$500,000 to \$700,000	0.7%	0.40%	0.5%
\$700,000 to \$1,499,000	0.6%	0.30%	0.4%
\$1,500,000 and greater	0.5%	0.30%	0.4%

Portfolio management for a 401 (k) includes an annual portfolio design, analysis, rebalancing and implementation. Portfolio management fees for immediate family may be lower.

Either the client or advisor may terminate this agreement at any time confirming in writing. In the event this agreement is cancelled, the fee payable by client shall be prorated for the current quarter. Upon advisor receipt of written notice of termination from client, advisor shall terminate portfolio management on an agreed upon date by the client and collect the prorated final fee.

Wealth Building Plan

Wealth Building Plans and Retirement Plans are free for portfolio management clients.

If a Plan is created for a client and the client does not engage in portfolio management, a fee of \$500 will be charged.

401(k) Plan Reviews

401(k) plan setup reviews are free for portfolio management clients and for children of portfolio management clients under 30 years old. Target funds are often advised in new 401(k)'s until more money accumulates.

401(k) Portfolio Designs

Individual 401(k) portfolio designs are \$100 per portfolio for the first design and \$100 for subsequent designs of the same portfolio for non-portfolio management clients. (2017)

Jabil 401(k) designs are \$60 per year for the first and subsequent designs for non-portfolio management clients.

Focused Growth Investor Newsletter

The Focused Growth Investor Newsletter is free with portfolio management services.

The fee for the Focused Growth Investor newsletter is \$120 per year for 12 issues or \$200 for two years for 24 issues, paid in advance. Upon cancelation, a prorated refund will be distributed for the unsent issues of the term.

You receive a free subscription with portfolio management services.

Contingency Plan

Contingency plan options

- Use an alternate advisor group listed below.
- Find a new advisor on your own (See our investment advisor selection education report on our website)
- Manage your accounts yourself (Keep the same custodian and use PDM investments and based allocations)

In the event PDM Investment Services (Philip Michalek) could no longer perform the duties of portfolio management per the Advisory Agreement and Business Operating Procedure, you would be notified by TD Ameritrade and Renee Michalek and advised on the steps to take. You can also see your local retail TD Ameritrade office for assistance. Call the Advisor Platform group at 877-726-8741 for assistance.

When an RIA becomes unable to manage client accounts on the TD Ameritrade Advisor Services platform, the client accounts will be de-linked from the RIA's master account and moved to a TD Ameritrade branch office based on closest proximity to the client. Clients would be notified and their accounts would become self-directed. Schwab clients already have full control of their portfolios.

PDM Investment Services

Per the advisory agreement, Philip Michalek is your current assigned portfolio manager, which will not change without client consent.

- **Services:** Wealth Building Plans, Portfolio Design and Management, Portfolio Performance Analysis Reports, Focused Growth Investor Newsletter, Free 401(k) designs.
- **Strategy:** Tactical Market Asset Allocation to Control Risk, Strategic Asset Allocation with Sectors
Diversified Mutual Fund & Sector Portfolio
40 Active and Passive Managed Funds
Active Portfolio Management
Moderate Risk Portfolio is 75% Equities / 25% Bonds & Cash. LC 18%, MC 10%, SC 12%, Sector 15%, INT LC SC ASIA 20%
- **Performance:** Long term goal to exceed appropriate risk benchmark. Fidelity Asset Manager Fund Benchmark.
- **Structure & Cost:** Fee on a \$300,000 account is 0.8% of AUM plus fund fees and trading costs.
Minimum AUM is \$200,000

PDM Investment Services (Auto Pilot)

Portfolios are designed to go unattended for six months without any significant performance damage under most market conditions. Most of the stocks and mutual funds in your portfolio are selected as long-term holdings and should not require immediate attention.

- **Services:** None
- **Strategy:** Fixed Passive Asset Allocation with Sectors (Current Portfolio)
Diversified Mutual Fund & Sector Portfolio
40 Active and Passive Managed Funds
Passive Portfolio Management
Moderate Risk Portfolio is 75% Equities / 25% Bonds & Cash. LC 18%, MC 10%, SC 12%, Sector 15%, INT LC SC ASIA 20%
- **Performance:** At benchmark planned
- **Structure & Cost:** Fee on a \$300,000 account is 0.0% of AUM plus fund fees.
Minimum AUM is \$0

Schwab Intelligent Advisory with Intelligent Portfolios (Automated Web Based Model with Advisor)

- **Services:** Wealth Building Plans, Portfolio Design and Management, Portfolio Performance Summary, Schwab Newsletter.
- **Strategy:** Fixed Passive Asset Allocation with Rebalancing
Diversified Mutual Fund Portfolio
15 to 20 Schwab ETFs and Smart Beta funds and some Vanguard ETFs.
Passive Portfolio Management
Moderate Risk Portfolio is 82% Equities, 18% Bonds & Cash. LC 26%, MC 0%, SC 13%, Sector 0%, INT LC/SC/EM 17%/8%/8%, REITS 5%, Commodities 5%. HY BD 5%, EM BD 6%, CASH 7%.
- **Performance:** At benchmark planned
- **Structure & Cost:** Fee on a \$300,000 account is 0.3% of AUM plus fund fees and trading costs.
Minimum AUM is \$25,000

Vanguard Personal Advisor Services (Automated Web Based Model with Advisor)

- **Services:** Wealth Building Plans, Portfolio Design and Management, Portfolio Review, Vanguard Newsletter.
- **Strategy:** Fixed Passive Asset Allocation with Rebalancing
Diversified Mutual Fund Portfolio
4 Vanguard index funds with active managed bond funds
Passive Portfolio Management
Moderate Risk Portfolio is 75% Equities, 25% Bonds & Cash. LC 65%, MC 0%, SC 0%, Sector 0%, INT LC 20%, ITB
- **Performance:** At benchmark planned
- **Structure & Cost:** Fee on a \$300,000 account is 0.3% of AUM plus fund fees and trading costs.
Minimum AUM is \$50,000

Contingency Plan

TD Ameritrade Essential Portfolios (Automated Web Based Model with Advisor)

- **Services:** Portfolio Design and Management, Portfolio Summary Reports. Select portfolios add a Financial Consultant.
- **Strategy:** Fixed Passive Asset Allocation with Rebalancing
Diversified Mutual Fund Portfolio
10 Vanguard and iShares ETF's. Select portfolios add active and passive funds.
Large Cap, International with EM and mostly US bonds. Five portfolios with Morningstar designs.
Passive Portfolio Management
Moderate Risk Portfolio Base is 75% Equities / 35% Bonds & Cash
- **Performance:** At benchmark planned
- **Structure & Cost:** Fee on a \$300,000 account is 0.3% to 0.5% of AUM plus fund fees and trading costs.
Select Portfolios 1.0% of AUM, \$250k 0.7%, \$500k 0.5%,
Minimum AUM is \$5,000

Schwab Managed Portfolios (SMP)

- **Services:** Portfolio Design and Management, Portfolio Performance Summary, Schwab Newsletter.
- **Strategy:** Fixed Passive Asset Allocation with Rebalancing
Diversified Mutual Fund Portfolio (Schwab active and passive funds)
Passive Portfolio Management
Moderate Risk Portfolio Base is 75% Equities, 25% Bonds & Cash. LC 45%, MC 0%, SC 10%, Sector 0%, INT 20%
- **Performance:** At benchmark planned
- **Structure & Cost:** Fee on a \$300,000 account is 0.5% of AUM plus fund fees and trading costs.
Minimum AUM is \$25,000

T. Rowe Price Retirement 2030 Fund (TRRCX) Moderate Risk. Mod-Aggressive= TRRJX, Mod-Conservative= TRRBX.

- **Services:** Portfolio Design and Management, Portfolio Summary Reports
- **Strategy:** Active Asset Allocation, Large Cap Growth
Diversified Mutual Fund Portfolio (18 T. Rowe Price Funds)
Active Portfolio Management
Moderate Risk Portfolio Base is 75% Equities / 25% Bonds & Cash in 2017. LC 38%, MC 10%, SC 3%, INT 25%
- **Performance:** 2.6% over MS Benchmark 5-yr. 2016= 7.7%, 2015= 0%, 2014= 6.1%, 2013= 23.1%, 2012= 16.8%, 2011= -2.7%.
- **Structure & Cost:** 0.7% of AUM internal fee.
Minimum AUM is \$2,500

Fidelity Asset Manager 70% Fund (FASGX) Moderate Risk. Mod-Agg= FAMRX 85%, Conservative= Mod-Cons= FSANX 60%

- **Services:** Portfolio Design and Management, Portfolio Summary Reports
- **Strategy:** Active Asset Allocation, Large Cap Growth
Diversified Stock Portfolio (> 1000 Stocks & ETF's)
Active Portfolio Management
Moderate Risk Portfolio Base is 70% Equities / 20% Bonds & Cash in 2017. LC 35%, MC 11%, SC 4%, INT 25%
- **Performance:** 1.6% over MS Benchmark 5-yr. 2016= 7.1%, 2015= -0.6%, 2014= 5.6%, 2013= 20.1%, 2012= 14%, 2011= -3.8%.
- **Structure & Cost:** 0.7% of AUM internal fee.
Minimum AUM is \$2,500

Provident Investment Management

- **Services:** Portfolio Design and Management, Portfolio Summary, Investment Advisory Service Newsletter.
- **Strategy:** Asset allocation based on stock selection
Diversified Stock, Bond and ETF portfolios
Active Portfolio Management
- **Performance:** The Core Equity Account has outperformed the S&P 500 from 2005 thru 2016 on average.
- **Structure & Cost:** Fee on a \$300,000 account is 1.25% of AUM plus fund fees and trading costs.
Minimum AUM is \$350,000

Our contingency partner, Provident Investment Management would contact you if you meet their requirements.

They have agreed to accept clients that meet their minimum of \$350,000 of assets under management or have considerable assets or a high income to get them to that amount. The Focused Growth Investor newsletter and most of the wealth plan services would end. Financial planning services would be limited by Provident. Provident is editor of the Investment Advisory Service newsletter, which could be purchased by the client.

Provident Investment Management is an independent registered investment advisor. They are affiliated with Better Investing (NAIC) and the Investor Advisory Service newsletter. Their investment strategy is based on fundamental and valuation analysis. They look for growth companies with strong and consistent revenue and earnings growth, an expanding or steady pretax profit margin and a return-on-equity that is steady or growing. Companies are purchased at a reasonable price and at a favorable reward-risk ratio. They primarily invest in stocks, bonds and ETFs.

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