

BLAKE-SCHUTTER WEALTH ADVISORS LLC

**CRD Number: 292661
Wrap Fee Program Brochure
Form ADV Part IIA – Appendix 1**

Dated March 16, 2021

**7777 Washington Village Drive,
Suite 120
Dayton, OH 45459**

This wrap fee program brochure provides information about the qualifications and business practices of Blake-Schutter Wealth Advisors, LLC (“Adviser”). If you have any questions about the contents of this brochure, please contact us by telephone at: 937-956-7875, or by email at: info@blakeschutter.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. The Adviser’s registration as an Investment Adviser does not imply a certain level of skill or training.

Additional information about the Adviser is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2: Material Changes

Annual Update

The Firm Brochure will be updated annually or when material changes occur since the last update.

Material Changes since the Last Update

The Adviser is registered with the U.S. Securities and Exchange Commission.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact Edward J. Blake, CCO, by telephone at: 937-956-7870, or by email at: ed.blake@blakeschutter.com.

ITEM 3. TABLE OF CONTENTS

ITEM 2.	MATERIAL CHANGE	i
ITEM 3.	TABLE OF CONTENTS	1
ITEM 4.	SERVICES, FEES AND COMPENSATION	1
ITEM 5.	ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS	4
ITEM 6.	MANAGER SELECTION AND EVALUATION	4
ITEM 7.	CLIENT INFORMATION PROVIDED TO MANAGERS	4
ITEM 8.	CLIENT CONTACT WITH MANAGERS	5
ITEM 9.	ADDITIONAL INFORMATION	5

ITEM 4 SERVICES, FEES AND COMPENSATION

Blake-Schutter Wealth Advisors, LLC (“Blake-Schutter”) is an investment advisory firm registered with the U.S. Securities and Exchange Commission (“SEC”).

Clients may select from a variety of investment management services, including portfolio management managed by Blake-Schutter, or an independent, third-party money manager, financial planning, and family office services. Blake-Schutter provides services to clients through individuals registered as investment adviser representatives, who are referred to internally as “Financial Advisors”. Financial Advisors may be specialists in areas such as wealth and tax management. This Form ADV, Appendix 1-Wrap Program Brochure is offered to potential and existing clients to provide an understanding of available programs sponsored by Blake-Schutter, and our related conflicts of interest. Clients typically include high and ultra-high net worth families as well as individuals, businesses, pension and profit-sharing plans, trusts, estates and charitable organizations, corporations or other business entities. Clients are advised that the same or similar programs or services as those described herein may be available from other investment advisors for an annual fee lesser or greater than set forth herein, and that the programs described in this brochure may cost the client more or less than purchasing the different services within each program separately depending upon such factors as account size, portfolio management fees, mutual fund no-load or load charges, etc. Financial Advisors will be reasonably available for consultation with clients regarding the management of their account. Blake-Schutter will provide necessary financial information to money managers including material changes as notified by the client as needed.

AVAILABLE PROGRAMS

Blake-Schutter Wrapped Account program (“Advisor Directed Program”) Description

This section describes the Advisor Directed Program. The minimum amount of assets required to participate in the Advisor Directed Program is generally \$500,000, subject to negotiation. Each client participating in the Advisor Directed Blake-Schutter has an agreement with TD Ameritrade that sets forth the services that Blake-Schutter will provide the client and the fee the client will pay. Blake-Schutter also has agreements with certain third-party money managers

chosen to participate in the Advisor Directed Program. TD Ameritrade provides execution, custody and administrative services to Blake-Schutter clients. Securities and/or cash designated by the client for inclusion in the Advisor Directed Program are maintained in one or more accounts held at TD Ameritrade.

Clients in the Advisor Directed Program generally grant Blake-Schutter authority to manage their accounts on a discretionary basis in accordance with the client's investment objectives, risk tolerance and investment time horizon, subject only to any reasonable restrictions that the client has provided to Blake-Schutter in writing. The client's Financial Advisor will be responsible for making investment decisions for the account on Blake-Schutter's behalf. Pursuant to this grant of discretion, clients authorize Blake-Schutter to invest in securities and other investments of any nature whatsoever, at the time and in the manner that the Financial Advisor determines, and to act on the client's behalf in all other matters necessary or incidental to the handling of the account, without discussing these transactions or actions with the client in advance. The specific terms of the investment advisory relationship are set forth in the Client Advisory Agreement. Accounts utilizing an individual investment style and strategy in accordance with each client's financial situation and investment objective for the Advisor Directed Program account. If a third-party money manager is selected, its investment style and strategy will also be chosen in accordance with the client's financial situation and investment objective for the Advisor Directed Program Account. Transactions in Advisor Directed Program accounts generally are executed through the unaffiliated broker-dealer TD Ameritrade. Third-party money managers must meet certain requirements as established by Blake-Schutter and as determined through Blake-Schutter's due diligence.

Any restrictions on the management of the Advisor Directed Program account imposed by the client or by such written investment policies or guidelines may cause Blake-Schutter or the money manager to deviate from the investment decisions it otherwise would make in providing services under the Advisor Directed Program. Blake-Schutter will have no liability for a client's failure to provide Blake-Schutter with accurate or complete information or to inform Blake-Schutter promptly of any change in the information previously provided. Financial Advisors and money managers will be reasonably available for consultation with clients regarding the management of their account. Blake-Schutter will provide necessary financial information to the money manager including material changes as notified by the client as needed.

ii. Fee Schedule

Clients in the Advisor Directed Program pay a fee that covers, among other things, services provided by the custodian and services provided by applicable money manager(s) (a "program fee"). Clients also pay advisory fees to Blake-Schutter for the services it provides. The program fee and the Blake-Schutter advisory fee are bundled into one fee (the "Wrap Fee"). The Wrap Fee covers investment advisory services, execution of transactions, custody with Selected Custodians, and reporting.

iii. General Fee Issues

Blake-Schutter, in its discretion, may negotiate the fee (and the rate of any other fees charged by Blake-Schutter for services not covered by the Wrap Fee) in appropriate circumstances, based on a number of factors including, but not limited to, the type and size of the account, the size or number of trades anticipated to be executed for the account, services provided to the account, the client's other accounts with Blake-Schutter, and the accounts of the client's family with Blake-Schutter. The fees charged may be higher or lower than the fees that Blake-Schutter

charges other clients in this or other programs; and may be higher or lower than the cost of similar services offered through other financial firms. The account may be subject to a minimum fee specified in the Client Advisory Agreement. In connection with the Advisor Directed Program, Financial Advisors may utilize an investment strategy that generally seeks investments that are long term in nature with a buy and hold bias. Due to the nature of these strategies, investments in accounts could incur low turnover. However, the client continues to pay the Wrap Fee regardless of the number of transactions incurred in the account. Client should also be aware that services similar or comparable to those provided to them might be available to the client at a lower aggregate cost elsewhere on an “unbundled” basis.

The Wrap Fee does not cover brokerage commissions or other charges resulting from transactions not effected through the qualified custodian broker-dealers, nor does it cover custody services provided by any non-core custodian. The Wrap Fee does not cover certain costs or charges that may not be imposed by Blake-Schutter, including, but not limited to, costs associated with exchanging foreign currencies, odd lot differentials, activity assessment fees, transfer taxes, exchange fees, wire transfer fees, postage fees, auction fees, foreign clearing, settlement and custodial fees, and other fees or taxes required by law. The Wrap Fee does not cover “mark-ups” or “mark-downs” that broker-dealers may receive or “dealer spreads” that other broker-dealers may receive when acting as principal in certain transactions. The Wrap Fee also does not cover the annual fee that Selected Custodians charge Individual Retirement Accounts (“IRA accounts) or certain other retirement plans. Costs associated with using margin are not covered in the Wrap Fee and may result in additional compensation to Blake-Schutter and the Financial Advisor representative. As such, Financial Advisors are subject to a conflict of interest in recommending that Advisory Clients open margin accounts and maintain debit balances. The Financial Advisor or the money manager may invest account assets in open-end mutual funds (including money market funds), closed-end funds, exchange traded funds (“ETFs”), and other collective investment vehicles that have various internal fees and expenses, which are paid by such funds, but which are ultimately borne by the client as an investor. Besides general equities and fixed income securities, Financial Advisors and Money Managers may employ strategies that utilize the following types of investments: (i) American Depositary Receipts (“ADRs”), which are receipts issued by a U.S. bank or trust company that evidence ownership of non U.S. securities and are traded on a U.S. exchange or in the over the counter market; (ii) Global Depositary Receipts (“GDRs”), which are receipts issued generally by a non U.S. bank or trust company that evidence ownership of non U.S. securities; (iii) World Equity Benchmark Shares (“WEBS”), which are shares of Foreign Fund, Inc., an open end investment company organized in series, each of which invests primarily in non U.S. common stocks in an effort to track the performance of a specified foreign country equity market index compiled by Morgan Stanley Capital International (“MSCI”); or (iv) closed end investment companies that invest a substantial portion of their assets in the securities of specified foreign countries (“closed end country funds”). Clients will bear, in addition to the Wrap Fee, a proportionate share of any fees and expenses associated with these securities, if applicable, in which account assets are invested, and may also bear any fees and expense associated with converting non-U.S. securities into ADRs or GDRs, if applicable. A portion of the Wrap Fee is paid to the Financial Advisor. The Financial Advisor receives compensation as a result of the client’s participation in the Advisor Directed Program, and the amount of this compensation may be more or less than what the Financial Advisor would receive if the client participated in other Blake-Schutter or affiliate’s programs or paid separately for investment advice, brokerage, and other services. The Financial Advisor may have a financial incentive to recommend the Advisor Directed Program over other Blake-Schutter or affiliate’s programs and services. The Wrap Fee is an agreed upon annual fee that will be payable based on the advisory agreement. This determination will be made and disclosed at the time of the client advisory agreement signing. Billing for the quarter

will be in arrears or advance and based on the average daily balance and the number of days assets are in the Account(s), or for the billing period ending balance. Please refer to the Firm Brochure, item 5 for billing practices. Blake-Schutter is not compensated based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds of any client. Transactions in the account may be affected through the Selected Custodian of choice, unless otherwise required by applicable law. When a transaction is executed through the Client's Qualified Custodian the Custodian will be entirely responsible for the execution and clearance of the transaction.

Blake-Schutter shall comply with its duty to obtain "best execution." However, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where Blake-Schutter determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while Blake-Schutter will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions. In addition, Blake-Schutter may receive certain products and services from broker/dealers that are customary in the course of an institutional brokerage relationship. To the best of Blake-Schutter's knowledge, these services are generally made available to all institutional investment advisers doing business with these broker/dealers. These bundled services are made available to Blake-Schutter on an unsolicited basis and without regard to the rates of commissions charged or paid by clients or the volume of business directed to these broker/dealers. Since these products and services are merely made available by broker/dealers as part of a bundled business package to Blake-Schutter, Blake-Schutter does not consider products and services received in this context to be "soft dollars".

ITEM 5. ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

Clients participating in the Advisor Directed Program may include endowments, foundations, retirement plans, corporations, individuals, and other entities. There may be minimum account sizes required to participate in the various programs; these minimums are dependent on the Program and manager preferences.

ITEM 6. MANAGER SELECTION AND EVALUATION

Blake-Schutter may act as portfolio managers and run their own models, or with money managers or mutual funds. The advisory business offered when Blake-Schutter is acting as portfolio manager is no different than any other advisory business offered as described in the Advisory Business section of Form ADV Part IIA. The advisory team will obtain the necessary client information to make an informed decision on the asset allocation for the client.

ITEM 7. CLIENT INFORMATION PROVIDED TO MANAGERS

Initially Blake-Schutter will interview prospective clients to determine their financial position, investment goals and objectives (e.g., risk tolerance and time horizon), investment limitations, reasonable investment restrictions and risk tolerance (collectively "Investor Profile"). The Investor Profile is used to help determine the clients' investment needs. At least annually, Blake-

Schutter will contact clients to determine whether they have had any changes to their Investor Profile. Should changes occur to a client's Investor Profile before the annual conference call or meeting, it is the client's responsibility to contact Blake-Schutter as soon as possible.

ITEM 8. CLIENT CONTACT WITH MANAGERS

Where Blake-Schutter's Financial Advisory teams act as the Portfolio Manager on the client accounts, generally there are no restrictions placed on the client contacting them. Blake-Schutter will be reasonably available for consultation with clients regarding the management of their account. Questions about client account(s) and/or the investment activity should be directed to the client's Financial Advisor at Blake-Schutter. Blake-Schutter will serve as the liaison between clients and their third-party money manager(s), where applicable.

ITEM 9. ADDITIONAL INFORMATION

Code of Ethics

Blake-Schutter has adopted a code of ethics (the "Code") Establishing rules of conduct for all employees, officers and directors of the investment advisory entity and is designed to, among other things, govern personal securities trading activities in the accounts of associated persons. The Code is based upon the principle that Blake-Schutter and its employees, officers and directors owe a fiduciary duty to Blake-Schutter's clients to conduct their financial affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

General Standards of Business Conduct; Insider Trading

The Code was developed to provide general ethical guidelines and specific instructions regarding the duties owed to advisory clients. All access persons must act with competence, dignity, integrity, and in an ethical manner, when dealing with clients, the public, prospects, third-party service providers and fellow access persons. Access persons must use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, trading, promoting Blake-Schutter's services, and engaging in other professional activities. All access persons are expected to adhere to the highest standards with respect to any potential conflicts of interest with clients. As a fiduciary, Blake-Schutter must act in its clients' best interests. In addition, and in compliance with Section 204A of the Advisers Act, and Rule 204-1 thereunder, Blake-Schutter has adopted written policies and procedures that are embodied in the Code, designed to detect and prevent the misuse of material, nonpublic information.

Personal Securities Transactions of "Access Persons"

Through its professional activities, Blake-Schutter and its supervised persons are exposed to potential conflicts of interest and the Code contains provisions designed to mitigate certain of these potential conflicts, by governing the personal securities transactions of certain of its employees, officers and directors. In particular, the Code governs the conduct of so-called "access persons" in instances, among others, where Blake-Schutter or certain individuals associated with Blake-Schutter may desire to purchase or sell securities for their personal

accounts that are identical to those recommended by Blake-Schutter to its clients. For these purposes, the Code defines an “access” person as a supervised person of Blake-Schutter that (i) has access to nonpublic information regarding any clients’ purchase or sale of securities, (ii) has access to nonpublic information regarding the portfolio holdings of any fund the adviser or its control affiliates manage, or (iii) is involved in making securities recommendations (or has access to such recommendations) to clients that are nonpublic. Access persons’ trades must be executed in a manner consistent with the following principles: (i) the interests of client accounts will at all times be placed first; (ii) all personal securities transactions will be conducted in such manner as to avoid any actual or potential conflict of interest or any abuse of an individual’s position of trust and responsibility; and (iii) access persons must not take inappropriate advantage of their positions. Access persons must submit quarterly reports regarding securities transactions and newly opened accounts, as well as annual reports regarding holdings and existing accounts. Blake-Schutter monitors access persons’ personal trading activity at least quarterly to ensure compliance with internal control policies and procedures. Blake-Schutter strives to ensure that all access persons act in accordance with applicable regulations governing registered investment advisory practices as they apply to Blake-Schutter.

The Code does not prevent or prohibit access persons from trading in securities that Blake-Schutter may recommend, or in which Blake-Schutter may invest client assets. Rather, it prescribes the principals that must govern all access persons’ personal trading activities (i.e. that (i) the interests of client accounts will at all times be placed first; (ii) all personal securities transactions will be conducted in such manner as to avoid any actual or potential conflict of interest or any abuse of an individual’s position of trust and responsibility; and (iii) access persons must not take inappropriate advantage of their positions). As such, it is possible that (i) Blake-Schutter and its advisory personnel, could recommend to clients, or buy or sell for client accounts, securities in which one or more access persons (or even Blake-Schutter) has a material financial interest, (ii) access persons (or even Blake-Schutter) could invest in the same securities (or related securities) that Blake-Schutter or its advisory personnel recommends to clients, or (iii) Blake-Schutter or its advisory personnel, could recommend securities to clients, or buy or sell securities for client accounts, at or about the same time that one or more access persons buys or sells the same securities for their own account. This presents a potential conflict in that the access person might seek to benefit himself or herself from this type of trading activity in the same securities, either by trading for personal accounts in advance of client trading activity, or otherwise. These types of potential conflicts are precisely why Blake-Schutter has articulated clear principles regarding such conduct and has required the submission of regular reports regarding personal securities transactions of its access persons. As noted above, conduct by an access person that is contrary to the Code may subject the access person to possible sanctions including, in appropriate cases, termination of employment. Investment management services, wrap programs.

Each account receives at minimum an annual review by the advisory team. In most cases, accounts are reviewed more frequently through various means, including telephone calls, in-person meetings, overall strategy reviews, and/or the review of monthly and quarterly statements. Reviews are based on objectives and parameters established by clients, which are generally memorialized through their individual advisory agreements, investment policy statements, or other suitability and investment objectives documentation. Periodic reviews and face-to-face meetings or conference calls may be triggered by events such as client requests, a change in financial goals or objectives, and significant world, economic or market events. While Blake-Schutter will typically evaluate the continued suitability of specific third-party money managers (as applicable), managed account platforms, and wrap programs during account

reviews, the administrators of such platforms and programs (which may be Blake-Schutter, a Custodian, or another third-party) may also perform their own reviews of managers appearing on the platforms and programs. Any such reviews will be disclosed in the manager's separate disclosure documents sent at account opening, after material changes and/or annually and are maintained by the administrators to applicable platforms and programs. Blake-Schutter's Compliance group performs regular and rigorous reviews of client accounts to determine adherence with the client's account suitability, risk tolerance and goals, among other things.

Regular Reports provided to clients

Blake-Schutter will provide investment management clients with a quarterly performance report. This report is typically an account appraisal and may identify some or all of the following information: current positions, security cost basis and current market value, and capital contributions and withdrawals from the account. In addition, a summary performance analysis report, which shows the portfolio rate of return, will be provided for the most recent quarter and will also show the return from inception of the account. Taxable clients may receive a realized gain and loss report for tax purposes. These reports are customizable to deliver what Blake-Schutter or the client deems pertinent. All reports are in addition to custodial statements and transaction confirmations received from the client's custodian; they in no way replace the custodial statements. These reports will often be provided electronically or presented in face-to-face meetings. Additional reporting may also be provided by third-party money managers and the administrators of managed account platforms and wrap programs, depending on the particular third-party money manager, platform, or program selected. Any such additional reporting will be disclosed in the separate disclosure documents maintained by third-party money managers and the administrators to applicable platforms and programs.

Compensation Policy

Blake-Schutter receives no additional compensation outside fees charged based on the advisory agreement. In general, Blake-Schutter monitors its fees and generally seeks to structure its compensation so that it does not exceed 2.5% annually (250 basis points), depending upon the scope and amount of services provided to the client. Advisory fees for some Blake-Schutter clients may be higher than that charged by other advisers that provide the same or similar services.

Economic Benefits Received from Non-Client

Blake-Schutter policies prohibit our related persons from accepting any form of compensation, including cash, sales awards or other prizes, in conjunction with the advisory services we provide to our clients.

Adviser participates in the TD Ameritrade Institutional and Additional Services programs. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/SIPC. TD Ameritrade is an independent, and unaffiliated, SEC registered broker-dealer. TD Ameritrade offers to independently registered investment advisers services which include custody of securities, trade execution, clearance and settlement of transactions. Adviser receives economic benefits from TD Ameritrade through its participation in these programs.

Adviser participates in TD Ameritrade's institutional customer program and Adviser may recommend TD Ameritrade to clients for custody and brokerage account services. There is no direct link between Adviser's participation in the program and the investment advice it gives to

clients, although Adviser receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits may include one or more of the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Adviser participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services. These benefits received by the Adviser, or its associated persons, do not depend on the amount of brokerage transactions directed to TD Ameritrade.

Adviser also receives certain additional economic benefits (“Additional Services”) that may or may not be offered to any other independent advisers participating in that program. The Additional Services include payment for services provided by vendors for transition management, platform license fees, account data, technology and trading. The payment for these services has economic value to Adviser. TD Ameritrade provides the Additional Services to Adviser in its sole discretion and at its own expense, and Adviser does not pay a fee to TD Ameritrade.

Adviser and TD Ameritrade have entered into a separate agreement (“Additional Services Addendum”) to govern the terms of the provision of the Additional Services. Adviser’s receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to Adviser, TD Ameritrade considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, the Adviser’s client accounts maintained with TD Ameritrade when determining whether to provide or continue providing Additional Services to the Adviser. TD Ameritrade has the right to terminate the Additional Services Addendum with Adviser, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain Additional Services from TD Ameritrade, Adviser may have an incentive to recommend to its clients that the assets under management by Adviser be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. Adviser’s receipt of Additional Services does not diminish its duty to act in the best interests of its clients, including to seek best execution of trades for client accounts. Adviser’s recommendation that clients maintain their assets in accounts at TD Ameritrade may be based, in part, on benefits provided to Adviser or by the availability of some of the foregoing products and services and not solely on the custody and brokerage services provided by TD Ameritrade, which creates potential conflicts of interest. Adviser believes, however, that taken in the aggregate, Adviser’s recommendation of TD Ameritrade as custodian and broker is in the best interests of clients. Adviser’s recommendation is primarily supported by the scope, quality, and price of TD Ameritrade’s services, and not TD Ameritrade’s services that benefit only Adviser.

Share Class Policy

Blake-Schutter may invest account assets in open-end mutual funds (including money market funds), closed-end funds, ETFs, and other collective investment vehicles that have various internal fees and expenses, which are paid by such funds, but which are ultimately borne by the Client as an investor (“asset-level fees”). In selecting or recommending share classes in such investments for Client accounts, it is Blake-Schutter’s policy to identify the lowest available fee class for which the applicable Client account is eligible through the Blake-Schutter platform. Additionally, in some circumstances Blake-Schutter may recommend a commission-free ETF or

another commission-free product for wrap account notwithstanding the fact that they are available on a commission-free basis outside of the wrap account. Such determinations will be based on the client's investment objectives, the performance and characteristics of the product under consideration, and the available investment alternatives. As part of its policy to identify suitable share classes and commissionable or commission-free investments, Blake-Schutter provides ongoing training to its employees, and conducts periodic monitoring of commission-free ETFs and mutual fund share classes in which Client accounts are invested. Blake-Schutter may utilize commission-free ETFs in its account management, including within wrap accounts. This creates a conflict because it benefits Blake-Schutter in that the overall fee collected for the wrap account is higher than it would be if commissionable ETFs were utilized. The Firm mitigates this risk by ensuring that the investment decision is based on suitability, performance and fund objective, not transaction costs. This is accomplished through advisor training and education, periodic review of transactions and product access through the applicable custodians.