

FORM ADV—PART 2A

*Uniform Application For
Investment Adviser
Registration*

This Part of Form ADV gives information about the Investment Adviser and its business for the use of clients. The information has not been approved or verified by any government authority. Buffington Mohr McNeal uses this part of Form ADV as its Disclosure Document.

Revised 3/12/2021

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MCNEAL**

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BUFFINGTON
MOHR
MCNEAL

REGISTERED
INVESTMENT
ADVISOR

BUFFINGTON MOHR MCNEAL

Client Relationship Summary

June 2020

TBFM, LLP dba Buffington Mohr McNeal (referred to as “BMM” or “we”, “our”, “us”) is registered with the U.S. Securities and Exchange Commission (“SEC”) as an Investment Adviser. BMM began conducting business in 1998. BMM and its Financial Professionals are licensed and registered to offer investment advisory services. Brokerage services and investment advisory services are different, and the fees associated with each are different; it is important that you understand the differences. You can also access free and simple tools to help you research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

Our Financial Professionals are qualified to offer investment advisory and financial planning services. Each Financial Professional generally provides access to a range of investment products, such as stocks, bonds, mutual funds and exchange-traded funds (ETFs). We offer these investment products through personalized, discretionary portfolio management. Discretionary means we will implement transactions without seeking your prior consent. Typically, we monitor your account and your investments on an ongoing basis to ensure your account aligns with your investment goals. The range of investment options available to you may be limited depending on your investment size, ability to meet account minimum requirements, your personal suitability and other such qualifications. We encourage you to ask your Financial Professional whether any investment limitations or account requirements apply.

For additional information about our advisory services, please visit our [website](#) or review Item 4 of our [ADV Part 2A](#).

Conversation Starter. We encourage you to ask your financial professional:

Given my financial situation, should I choose an investment advisory service? Why or why not?
How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

What fees will I pay?

For investment advisory services, we typically charge an ongoing quarterly, **asset-based fee** of up to 1% of the value of your assets in the account we manage. The fee may be negotiable and may also be lower depending on account size. The more assets you have in this type of account, the more you'll pay in fees, which creates an incentive to encourage you to increase the size of your account. Financial Planning fees are calculated and charged on an **hourly basis** at a rate of \$125 per hour or on a **fixed fee basis**, typically between \$500 to \$2500, depending on the complexity of your situation and planning needs. If applicable to your account, we'll charge you directly for **other fees in addition advisory fees**, such as fees relating to custody, trade confirmation processing, corporate actions, transfer fees and wire fees. Generally, advisory fees don't include any brokerage commissions and other transactions costs, redemption fees, wire transfer fees, overnight check fees, account closing fees, or any other charges imposed by the administrator, custodian, or other service provider. **You will pay fees and incur costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time.**

For additional information, please Item 5 of the [ADV Part 2A](#).

Conversation Starter. We encourage you to ask your financial professional:

Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when providing recommendations as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations and investment advice we provide you. Here are some additional examples to help you understand what this means.

Rollovers

In the event you choose to roll assets out of a retirement plan, such as a 401(k) plan, and into an individual retirement account (IRA), we have a financial incentive to recommend that you invests those assets with us, because we will be paid on those assets. You should be aware that such fees may be higher than those that you pay through the plan, and there can be custodial and other maintenance fees. As securities held in a retirement plan are generally not transferred to an IRA, commissions and sales charges may be charged by the plan custodian when liquidating such securities prior to the transfer, in addition to commissions and sales charges previously paid on transactions in the plan.

For additional information, please see our [ADV Part 2A](#), Item 4, 5 & 17.

Conversation Starter. We encourage you to ask your financial professional:

How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

Our Financial Professionals are employees of BMM. They receive a base salary plus additional compensation based on the assets they service; therefore, this creates an incentive for them to encourage you to increase your investment account size.

Do you or your financial professionals have any legal or disciplinary history?

None of our Financial Professionals have disciplinary history. Visit www.investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation Starter. We encourage you to ask your financial professional:

As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

For additional information on advisory services, see our Form ADV brochure and any brochure supplement your Financial Professional provides you, or visit our [website](#). To report a problem to the SEC, you can visit www.Investor.gov or call the SEC's toll-free investor assistance line at (800) 732-0330. If you have a problem with your investments, account or your Financial Professional, please contact us:

Buffington Mohr McNeal
802 W Bannock Street, Suite 100
Boise, ID 83702
208-338-5551
bmohr@bmmria.com

Conversation Starter. We encourage you to ask your financial professional:

Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer?
Who can I talk to if I have concerns about how this person is treating me?



BUFFINGTON MOHR MCNEAL PRIVACY POLICY NOTICE

In establishing an advisory account with us, it is necessary you provide our firm with certain personal financial information to ensure that your portfolio is managed in a manner consistent with your investment objectives and financial goals. This information will generally be derived from the following sources:

1. Information we receive from you on the Confidential Financial Planning Questionnaire or other forms, and
2. Information about your securities transactions with Buffington Mohr McNeal or other advisors and broker/dealers which may be providing financial services to you.

It is the policy of Buffington Mohr McNeal that **we do not disclose** any non-public personal information about you to anyone, except as permitted by law or by written or verbal consent by you. We adhere to the privacy policies and practices as described in this notice for closed or inactive accounts as well.

Buffington Mohr McNeal maintains physical, electronic and procedural safeguards to guard your non-public personal information.

We appreciate your business and the opportunity to serve you. We know confidentiality is important to you; therefore protecting your privacy is a priority at Buffington Mohr McNeal.

Part 2A of Form ADV: Firm Brochure

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ADVISOR

TBFM, LLP

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Web Address: www.bmmria.com 3/12/2021

This brochure provides information about the qualifications and business practices of Buffington Mohr McNeal. If you have any questions about the contents of this brochure, please contact us at 208-338-5551 or bmohr@bmmria.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Buffington Mohr McNeal also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 109361.

Item 2 Material Changes

This Firm Brochure, dated March 12, 2021, is our disclosure document prepared according to the SEC's requirements and rules. This document is a narrative that includes some new information.

After our initial filing of this Brochure, this Item will be used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information.

Consistent with the SEC's requirements and rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

We've had the following material changes since our last ADV Part 2A brochure dated 3/17/2020:

1. No material changes.

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Item 4 Advisory Business

TBFM, LLP DBA Buffington Mohr McNeal is a SEC-registered investment adviser with its principal place of business located in Idaho. Buffington Mohr McNeal began conducting business in 1998.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

Bruce R Mohr, Portfolio Manager
Carey H McNeal, Portfolio Manager

Buffington Mohr McNeal offers the following advisory services to our clients:

INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy and create and manage a portfolio based on that policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

We manage these advisory accounts on a discretionary basis. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding a variety of marketable securities.

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

FINANCIAL PLANNING

We provide financial planning services. Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information and analysis are considered as

they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service receive an electronic presentation and available report which provides the client with a detailed financial plan designed to assist the client in achieving his or her financial goals and objectives.

In general, the financial plan can address any or all of the following areas:

- **PERSONAL:** We review family records, budgeting, personal liability, estate information and financial goals.
- **TAX & CASH FLOW:** We analyze the client's income tax and spending and planning for past, current and future years; then illustrate the impact of various investments on the client's current income tax and future tax liability.
- **INVESTMENTS:** We analyze investment alternatives and their effect on the client's portfolio.
- **INSURANCE:** We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **RETIREMENT:** We analyze current strategies and investment plans to help the client achieve his or her retirement goals.
- **DEATH & DISABILITY:** We review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- **ESTATE:** We assist the client in assessing and developing long-term strategies, including as appropriate, living trusts, wills, review estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid and elder law.

We gather required information through in-depth personal interviews and our online personal financial website. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client, including a questionnaire completed by the client, and prepare an electronic or written report. Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.

We also provide general non-securities advice on business planning.

AMOUNT OF MANAGED ASSETS

As of December 31, 2020, we were actively managing \$718,088,808 of clients' assets on a discretionary basis and \$16,999,233 of clients' assets on a non-discretionary basis. Our total Regulatory Assets Under Management (RAUM) is \$735,088,041.

Item 5 Fees and Compensation

INVESTMENT SUPERVISORY SERVICES INDIVIDUAL PORTFOLIO MANAGEMENT FEES

The annualized fee for ISSs will be charged as a percentage of assets under management, according to the following schedule:

FEE SCHEDULE FOR INVESTMENT MANAGEMENT SERVICES

<i>Market Value</i>	<i>Fee</i>
\$0 - \$2,000,000	1.00%
Over \$2,000,000	.50%

Our Fees: Management fees will be computed and paid at the beginning of the fiscal quarter. The fiscal quarters are March 1-May 31, June 1-August 31, September 1-November 30, and December 1-February 28 or 29. New accounts and terminated accounts will be charged a pro-rata fee for the period of time that assets are under management. In the event of termination of an agreement where fees have been paid in advance, a prorated refund will be made. Accounts may be terminated by either party with five (5) days written notice.

Our fees are billed quarterly, in advance, at the beginning of each fiscal quarter based upon the value (market value or fair market value in the absence of market value), of the client's account at the end of the previous quarter. Fees will be debited from the account in accordance with the client authorization in the Client Service Agreement.

FINANCIAL PLANNING FEES

Buffington Mohr McNeal's Financial Planning fee will be determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client.

Our Financial Planning fees are calculated and charged on an hourly basis at a rate of \$125 per hour or on a fixed fee basis, typically \$500 to \$2500, depending on the specific arrangement with the client including the number of areas to be analyzed or scenarios to be performed. Although the length of time it will take to provide a Financial Plan will depend on each client's personal situation, we will provide an estimate for the total hours or total cost at the start of the planning relationship.

We may request a retainer upon completion of our initial fact-finding session with the client; however, advance payment will never exceed \$1,200 for work that will not be

completed within six months. The balance is due upon completion of the planning engagement. Hourly rates will be billed in arrears based on actual hours accrued.

Financial Planning Fee Offset: Buffington Mohr McNeal reserves the discretion to reduce or waive the hourly fee and/or the minimum fixed fee if a financial planning client chooses to engage us for our Investment Supervisory Services.

Limited Negotiability of Advisory Fees: Although Buffington Mohr McNeal has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs will be considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition, reports, among other factors. The specific annual fee schedule will be identified in the contract between the adviser and each client.

We may group certain related client accounts for the purposes of achieving the minimum account size requirements and determining the annualized fee.

Discounts, not generally available to our advisory clients, may be offered to family members and friends of associated persons of our firm.

GENERAL INFORMATION

Termination of the Advisory Relationship: A client agreement may be canceled at any time, by either party, for any reason upon receipt of 5 days written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period.

Mutual Fund Fees: All fees paid to Buffington Mohr McNeal for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus.

These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Additional Fees and Expenses: In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s).

Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

ERISA Accounts: Buffington Mohr McNeal is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"). As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Buffington Mohr McNeal may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees.

Advisory Fees in General: Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Limited Prepayment of Fees: Under no circumstances do we require or solicit payment of fees in excess of \$1200 more than six months in advance of services rendered.

Item 6 Performance-Based Fees and Side-By-Side Management

Buffington Mohr McNeal does not charge performance-based fees.

Item 7 Types of Clients

Buffington Mohr McNeal provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Pension and profit sharing plans (other than plan participants)
- Charitable organizations
- Corporations or other businesses not listed above
- State or municipal government entities

Item 8 Methods of Analysis, Investment Strategies & Risk of Loss

METHODS OF ANALYSIS

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Fundamental Analysis. We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Technical Analysis. We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

Quantitative Analysis. We use mathematical models in an attempt to obtain more accurate measurements of a company's quantifiable data, such as the value of a share price or earnings per share, and predict changes to that data.

A risk in using quantitative analysis is that the models used may be based on assumptions that prove to be incorrect.

Qualitative Analysis. We subjectively evaluate non-quantifiable factors such as quality of management, labor relations, and strength of research and development factors not readily subject to measurement, and predict changes to share price based on that data.

A risk in using qualitative analysis is that our subjective judgment may prove incorrect.

Asset Allocation. Buffington Mohr McNeal manages core equity and core fixed portfolios. Clients may choose from these core strategies or they may elect to have Buffington Mohr McNeal allocate to these and other strategies to build an individually tailored portfolio mix. Asset allocations are developed based on information about the client's investment objectives, risk tolerance, income needs, and investment time horizon. Buffington Mohr McNeal selects an optimal allocation among various asset class categories.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the blend of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Mutual Fund and/or ETF Analysis. We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has

demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

Risks for all forms of analysis. Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

INVESTMENT STRATEGIES

We use the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Core Equity Style - Growth at a Reasonable Price

Buffington Mohr McNeal's investment strategy concentrates on companies with market capitalization over \$1 billion. The investment decision making process begins with a fundamental analysis of economic sectors, industries and individual companies. Our overall approach is to look for quality in management products, service and the balance sheet of potential investment opportunities. The objective is to build holdings in client portfolios characterized by historic and future profit growth above the market and price/earnings ratios at or below the market. This strategy uses the S&P 500 as a benchmark.

Fixed Income

Buffington Mohr McNeal's fixed income approach is based on the premise that the fixed income markets are not homogenous and that an active approach can enhance returns and manage risk. We use a balance of quantitative and qualitative management techniques to identify inefficient valuations of market sectors and individual securities, and pursue incremental returns above market performance through a combination of careful security selection, market knowledge, broad market access and efficient trading.

Long-term purchases. We purchase securities with the idea of holding them in the client's account for a year or longer. Typically we employ this strategy when:

- we believe the securities to be currently undervalued, and/or
- we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Risk of Loss. Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

Item 9 Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

Our firm and our related persons are not engaged in other financial industry activities and have no other industry affiliations.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Buffington Mohr McNeal and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and record keeping provisions.

Buffington Mohr McNeal's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to dbuffington@bmmria.com, or by calling us at 208-338-5551.

Item 12 Brokerage Practices

Buffington Mohr McNeal will block trades where possible and when advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts, so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block. Block trading may allow us to execute equity trades in a timelier, more equitable manner, at an average share price. Buffington Mohr McNeal will typically aggregate trades among clients whose accounts can be traded at a given broker, and generally will rotate or vary the order of brokers through which it places trades for clients on any particular day.

Custodial Arrangements. Buffington Mohr McNeal may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab") or Fidelity Advisor Solutions or TD Ameritrade Institutional ("the custodians"), a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although we recommend that clients establish accounts at one of the custodians, it is the client's decision to custody assets with Schwab, Fidelity or TD Ameritrade. Buffington Mohr McNeal is independently owned and operated and not affiliated with Schwab, Fidelity or TD Ameritrade. Buffington Mohr McNeal may accept client instructions evaluated on a case-by-case basis for directing the client's brokerage transactions to a particular broker-dealer.

The custodians provide Buffington Mohr McNeal with access to its institutional trading and custody services, which are typically not available to the custodian's retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at the custodian. These services are not contingent upon our firm committing to the custodians any specific amount of business (assets in custody or trading commissions). The custodians' brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For our client accounts maintained in its custody, the custodians generally do not charge separately for custody services but are compensated by account holders

through commissions and other transaction-related or asset-based fees for securities trades that are executed through the custodians or that settle into the custodian accounts.

The custodians also make available to our firm other products and services that benefit Buffington Mohr McNeal but may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our client accounts, including accounts not maintained at the custodian.

The custodian's products and services that assist us in managing and administering our clients' accounts include software and other technology that:

- i. provide access to client account data (such as trade confirmations and account statements);
- ii. facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- iii. provide research, pricing and other market data;
- iv. facilitate payment of our fees from clients' accounts; and
- v. assist with back-office functions, record keeping and client reporting.

The custodians also offers other services intended to help us manage and further develop our business enterprise. These services may include:

- i. technology, compliance, legal and business consulting;
- ii. publications and conferences on practice management and business succession; and
- iii. access to employee benefits providers, human capital consultants and insurance providers.

The custodians may make available and/or arrange third-party vendors for the types of services rendered to Buffington Mohr McNeal. The custodians provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend or require that clients custody their assets at the custodians, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by the custodian, which may create a potential conflict of interest.

Item 13 Review of Accounts

INVESTMENT SUPERVISORY SERVICES INDIVIDUAL PORTFOLIO MANAGEMENT

REVIEWS: While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or

economic environment.

These accounts are reviewed by members of the Investment Committee: Bruce Mohr, Carey McNeal, Molly Guenther, Rod MacKinnon and Tyler Lang.

REPORTS: In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, we may provide quarterly reports summarizing account performance, balances and holdings.

FINANCIAL PLANNING SERVICES

REVIEWS: While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted unless contracted for by Financial Planning clients.

REPORTS: Financial Planning clients will receive a completed financial analysis or plan. Additional reports will typically be provided only by contract.

Item 14 Client Referrals and Other Compensation

Buffington Mohr McNeal does provide compensation to certain firm employees in addition to their normal salary for recommending individuals who become clients of the firm. Buffington Mohr McNeal does not charge clients introduced by employees greater fees than fees charged to clients not introduced by employees.

It is Buffington Mohr McNeal's policy not to allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

Item 15 Custody

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

Our firm does not have actual custody of client accounts; however, our firm is deemed to have constructive custody of certain client accounts whereas persons of the firm serve as a Trustee over client assets. These limited fiduciary relationships involve only family members or long-term friends or acquaintances.

Item 16 Investment Discretion

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

Item 17 Voting Client Securities

Buffington Mohr McNeal has adopted proxy voting policies and procedures designed to ensure that it votes proxies in the best interest of its clients and that it provides clients with information about how their proxies are voted. In light of our fiduciary duty to clients, and given the complexity of the issues that may be raised with proxy votes, we have retained Proxytrust. ("Proxytrust"). Proxytrust is an independent third party that specializes in providing a variety of fiduciary-level proxy related services to institutional investment managers. Proxytrust provides us with in-depth research, voting recommendations, vote execution and recordkeeping.

At times, Buffington Mohr McNeal and/or Proxytrust may not be able to vote proxies on behalf of clients when clients' holdings are in countries that restrict trading activity around proxy votes or when clients lend securities to third parties. We attempt to identify any conflicts of interests between your interests and our own interest within our proxy voting process. If we determine that our Firm or one of our employees faces a material conflict of interest in voting your proxy (e.g., an employee of Proxytrust may personally benefit if the proxy is voted in a certain direction), our procedures provide for Proxytrust as an independent party to determine the appropriate vote. We will use our best judgment to vote proxies in the best interests of our clients and will typically follow the recommendations of Proxytrust.

In the event that we decide to vote a proxy (or a particular proposal within a proxy) in a manner different from the Proxytrust recommendation, we will document the reasons supporting the decision. In the event that we intend to deviate from the proxy voting recommendation of Proxytrust and where the public company is an entity with which we have a significant business relationship, then we shall bring the proxy voting issue to the attention of affected clients for guidance on how to vote the proxy.

Clients may obtain a copy of Buffington Mohr McNeal Proxy Voting Policies and Procedures and information about how their proxies were voted by contacting us at 208-

338-5551 or by writing to us at 802 W. Bannock St., Suite 100, Boise ID 83702.

Item 18 Financial Information

Buffington Mohr McNeal has no additional financial circumstances to report.

Part 2B of Form ADV: *Brochure Supplement*

Bruce R Mohr
Carey H McNeal
Tyler Lang
Molly Guenther
Steve Kovach
Rick Perez
Roderick MacKinnon
Andrea Puopolo
Joseph Eiguren
Ryan Malone



Buffington Mohr McNeal
802 W Bannock Street, Suite 100
Boise, ID 83702

3/12/2021

This brochure supplement provides information about the individual(s) listed above that supplements the Buffington Mohr McNeal brochure. You should have received a copy of that brochure. Please contact Bruce Mohr if you did not receive Buffington Mohr McNeal's brochure or if you have any questions about the contents of this supplement.

Additional information about the individual(s) listed above is available on the SEC's website at www.adviserinfo.sec.gov

Professional Certifications

Employees have earned the following certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (CFP)

Education Requirements

The education requirement for attaining CFP® certification includes two main parts:

1. Complete college or university-level coursework through a program registered with CFP Board, addressing the major personal financial planning areas identified by CFP Board's most recent Job Analysis Study; and
2. Verify that you hold a bachelor's degree or higher from an accredited college or university.

Coursework Requirement

Complete CFP Board education requirements in the major personal financial planning areas, including:

- Bachelor's degree
- Pass the CFP Certification Exam. The exam is a thorough test divided into 3 sections that add up to 10 hours in length and covers the topics listed above.
- 3 full time years of experience
- Initial Certification and ongoing adherence to the Code of Ethics
- Continuing Education that requires 30 hours of work annually.
- Complete CFP Board education requirements in the major personal financial planning areas, including:

The course work requirement includes completion of a financial plan development (capstone) course registered with CFP Board. This capstone course requirement has been designed to enhance the knowledge, skills and abilities of individuals seeking to attain CFP® certification and implement an assessment of their ability to deliver professional and competent financial planning services to the public.

Chartered Financial Analyst (CFA)

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals. There are currently more than 90,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own

- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment. Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession. To learn more about the CFA charter, visit www.cfainstitute.org.

Certified Public Accountant (CPA)

This designation is the statutory title of qualified accountants in the United States who have passed the Uniform Certified Public Accountant Examination and have met additional state education and experience requirements for certification as a CPA. To obtain this designation in Idaho, the applicant must pass the Uniform CPA Exam, hold a bachelor's degree which includes a minimum number of qualifying credit hours in accounting and business administration, complete one year of experience, and complete an ethics course. CPAs are required to take continuing education courses in order to renew their license, and Idaho requires CPAs to take an ethics course every two years.

Attorney at Law

This designation is offered by the Idaho State Bar Association. To obtain this designation, the application must have completed three years at an accredited law school in addition to their undergraduate degree and pass the Idaho bar exam. Continuing education is not required after an individual attains 72 years of age.

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Bruce R Mohr
Buffington Mohr McNeal
Portfolio Manager
802 W Bannock St., Ste. 100
Boise, ID 83702
Phone: 208-338-5551

Item 2 Educational Background and Business Experience

Bruce R Mohr is a Portfolio Manager at Buffington Mohr McNeal since April 1998

***Education:** Boise State University, B.A.A., Finance, 1981, University of Oregon, M.B.A., Finance, 1982.*

Joined Company: 1998

Began Career: 1983

Year of Birth: 1959

Item 3 Disciplinary Information

Not applicable

Item 4 Other Business Activities

Not applicable

Item 5 Additional Compensation

Not applicable

Item 6 Supervision

Buffington Mohr McNeal has adopted formal written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its business and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee is required to be responsible for and monitor those individuals he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements. Bruce Mohr, as the Compliance Officer, has the overall responsibility for employee supervision, client communications and monitoring and testing compliance with Buffington Mohr McNeal's policies and procedures. Carey McNeal provides supervisory oversight for Bruce Mohr. Mr. McNeal can be reached by phone at 208-338-5551 or by email at CMcNeal@bmmria.com.

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Carey H McNeal
Buffington Mohr McNeal
Portfolio Manager
802 W Bannock St., Ste. 100
Boise, ID 83702
Phone: 208-338-5551

Item 2 Educational Background and Business Experience

Carey H McNeal is a Portfolio Manager at Buffington Mohr McNeal since April 1998

***Education:** Boise State University, B.B.A., Marketing, 1988,
Joined Company: 1998
Began Career: 1986
Year of Birth: 1965*

Item 3 Disciplinary Information

Not applicable

Item 4 Other Business Activities

Not applicable

Item 5 Additional Compensation

Not applicable

Item 6 Supervision

Buffington Mohr McNeal has adopted formal written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its business and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee is required to be responsible for and monitor those individuals he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements. Bruce Mohr, as the Compliance Officer, has the overall responsibility for employee supervision, client communications and monitoring and testing compliance with Buffington Mohr McNeal's policies and procedures. Bruce R Mohr provides supervisory oversight for Carey McNeal. Mr. Mohr can be reached by phone at 208-338-5551 or by email at BMohr@bmmria.com

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Tyler Lang
Buffington Mohr McNeal
Portfolio Manager
802 W Bannock St., Ste. 100
Boise, ID 83702
Phone: 208-338-5551

Item 2 Educational Background and Business Experience

Tyler Lang is a Portfolio Manager at Buffington Mohr McNeal since November 2006

Education: University of Idaho, B.S. Finance 2004, B.S. Accounting 2004
Joined Company: 2006
Began Career: 2004
Year of Birth: 1981

Item 3 Disciplinary Information

Not applicable

Item 4 Other Business Activities

Not applicable

Item 5 Additional Compensation

Not applicable

Item 6 Supervision

Buffington Mohr McNeal has adopted formal written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its business and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee is required to be responsible for and monitor those individuals he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements. Bruce Mohr, as the Compliance Officer, has the overall responsibility for employee supervision, client communications and monitoring and testing compliance with Buffington Mohr McNeal's policies and procedures. Bruce R Mohr provides supervisory oversight for Tyler Lang, Mr. Mohr can be reached by phone at 208-338-5551 or by email at BMohr@bmmria.com

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Molly Guenther,
Buffington Mohr McNeal
Portfolio Manager
802 W Bannock St., Ste. 100
Boise, ID 83702
Phone: 208-338-5551

Item 2 Educational Background and Business Experience

Molly Guenther is a Portfolio Manager at Buffington Mohr McNeal since July 2017. Molly was a Portfolio Manager from April 2008 for A. Montag & Associates, Inc. Molly is also a CFA and CFP since 1991 and 2006 respectively. She is in good standing with the granting authority.

***Education:** Georgia Institute of Technology, BS Industrial Management, 1988
Joined Company: 2017
Began Career: 1988
Year of Birth: 1966*

Item 3 Disciplinary Information

Not applicable

Item 4 Other Business Activities

Not applicable

Item 5 Additional Compensation

Not applicable

Item 6 Supervision

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Steve Kovach,
Buffington Mohr McNeal
Portfolio Manager
802 W Bannock St., Ste. 100
Boise, ID 83702
Phone: 208-338-5551

Item 2 Educational Background and Business Experience

Steve Kovach is a Portfolio Manager at Buffington Mohr McNeal since February 2016. Steve was a Financial Consultant from April 2003 for Charles Schwab. Steve is a CFP since 2013 and is in good standing with the granting authority.

***Education:** Michigan State University, B.A. Finance, 1995
Joined Company: 2016
Began Career: 1995
Year of Birth: 1969*

Item 3 Disciplinary Information

Not applicable

Item 4 Other Business Activities

Not applicable

Item 5 Additional Compensation

Not applicable

Item 6 Supervision

Buffington Mohr McNeal has adopted formal written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its business and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee is required to be responsible for and monitor those individuals he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements. Bruce Mohr, as the Compliance Officer, has the overall responsibility for employee supervision, client communications and monitoring and testing compliance with Buffington Mohr McNeal's policies and procedures. Bruce R Mohr provides supervisory oversight for Steve Kovach, Mr. Mohr can be reached by phone at 208-338-5551 or by email at BMohr@bmmria.com.

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Rick Perez,
Buffington Mohr McNeal
Portfolio Manager
802 W Bannock St., Ste. 100
Boise, ID 83702
Phone: 208-338-5551

Item 2 Educational Background and Business Experience

Rick Perez is a Portfolio Manager at Buffington Mohr McNeal since September 2017. Rick was a Controller from April 2013 for Idaho Management Co., LLC. Rick is a CPA since 2008 and is in good standing with the Idaho granting authority.

Education: *Boise State University, Masters of Accountancy-Taxation, 2007*
Joined Company: 2017
Began Career: 2007
Year of Birth: 1985

Item 3 Disciplinary Information

Not applicable

Item 4 Other Business Activities

Not applicable

Item 5 Additional Compensation

Not applicable

Item 6 Supervision

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Roderick MacKinnon
Buffington Mohr McNeal
Portfolio Manager
802 W Bannock St., Ste. 100
Boise, ID 83702
Phone: 208-338-5551

Item 2 Educational Background and Business Experience

Roderick MacKinnon is a Portfolio Manager at Buffington Mohr McNeal since January 2016. Rod was an Investment Adviser from April 2003 for Mountain Pacific Investment Advisers.

***Education:** University of Oregon, MBA, 1983
Joined Company: 2016
Began Career: 1983
Year of Birth: 1958*

Item 3 Disciplinary Information

Not applicable

Item 4 Other Business Activities

Not applicable

Item 5 Additional Compensation

Not applicable

Item 6 Supervision

Buffington Mohr McNeal has adopted formal written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its business and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee is required to be responsible for and monitor those individuals he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements. Bruce Mohr, as the Compliance Officer, has the overall responsibility for employee supervision, client communications and monitoring and testing compliance with Buffington Mohr McNeal's policies and procedures. Bruce R Mohr provides supervisory oversight for Roderick MacKinnon, Mr. Mohr can be reached by phone at 208-338-5551 or by email at BMohr@bmmria.com.

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Andrea Puopolo
Buffington Mohr McNeal
Portfolio Manager
802 W Bannock St., Ste. 100
Boise, ID 83702
Phone: 208-338-5551

Item 2 Educational Background and Business Experience

Andrea Puopolo is a Portfolio Manager at Buffington Mohr McNeal since May 2000

***Education:** University of Nevada, B.S., 1996*

Joined Company: 2000

Began Career: 1998

Year of Birth: 1973

Item 3 Disciplinary Information

Not applicable

Item 4 Other Business Activities

Not applicable

Item 5 Additional Compensation

Not applicable

Item 6 Supervision

Buffington Mohr McNeal has adopted formal written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its business and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee is required to be responsible for and monitor those individuals he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements. Bruce Mohr, as the Compliance Officer, has the overall responsibility for employee supervision, client communications and monitoring and testing compliance with Buffington Mohr McNeal's policies and procedures. Bruce R Mohr provides supervisory oversight for Andrea Puopolo, Mr. Mohr can be reached by phone at 208-338-5551 or by email at BMohr@bmmria.com.

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Joseph Eiguren
Buffington Mohr McNeal
Portfolio Manager
802 W Bannock St., Ste. 100
Boise, ID 83702
Phone: 208-338-5551

Item 2 Educational Background and Business Experience

Joseph Eiguren is a Portfolio Manager at Buffington Mohr McNeal since March 2020. Joe was a General Manager at Tolsma USA since October 2016. Prior to that, he was a Commercial Lending Officer at Idaho Independent Bank from May 2007 – April 2014.

***Education:** University of Idaho, B.S. Business, 2006
Joined Company: 2020
Began Career: 2007
Year of Birth: 1984*

Item 3 Disciplinary Information

Not applicable

Item 4 Other Business Activities

Joseph Eiguren is a General Manager at Intelligent Office, since May 2014.

Item 5 Additional Compensation

Not applicable

Item 6 Supervision

Buffington Mohr McNeal has adopted formal written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its business and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee is required to be responsible for and monitor those individuals he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements. Bruce Mohr, as the Compliance Officer, has the overall responsibility for employee supervision, client communications and monitoring and testing compliance with Buffington Mohr McNeal's policies and procedures. Bruce R Mohr provides supervisory oversight for Joseph Eiguren, Mr. Mohr can be reached by phone at 208-338-5551 or by email at BMohr@bmmria.com.

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Ryan Malone
Buffington Mohr McNeal
Portfolio Manager
802 W Bannock St., Ste. 100
Boise, ID 83702
Phone: 208-338-5551

Item 2 Educational Background and Business Experience

Ryan Malone is a Portfolio Manager at Buffington Mohr McNeal since March 2020. Ryan was a Division Investment Director at U.S. Bank from June 2004 – March 2020.

***Education:** University of Idaho, B.S. Finance & Economics, 2004*

Joined Company: 2020

Began Career: 2004

Year of Birth: 1980

Item 3 Disciplinary Information

Not applicable

Item 4 Other Business Activities

Not applicable

Item 5 Additional Compensation

Not applicable

Item 6 Supervision

Buffington Mohr McNeal has adopted formal written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its business and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee is required to be responsible for and monitor those individuals he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements. Bruce Mohr, as the Compliance Officer, has the overall responsibility for employee supervision, client communications and monitoring and testing compliance with Buffington Mohr McNeal's policies and procedures. Bruce R Mohr provides supervisory oversight for Ryan Malone, Mr. Mohr can be reached by phone at 208-338-5551 or by email at BMohr@bmmria.com.