

**Firm Brochure**  
(Part 2A of Form ADV)

**PATRICK M. SWEENEY & ASSOCIATES, INC.**  
**18-1 E Dundee Rd., Suite 150 Barrington, IL**  
**60010**  
**847-277-7771**  
**847-277-7707 (FAX)**  
**Patrick@patrickmsweeney.com**

This brochure provides information about the qualifications and business practices of Patrick M. Sweeney & Associates, Inc. If you have any questions about the contents of this brochure, please contact us at: 847-277-7771, or by email at: Patrick@patrickmsweeney.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 Patrick M. Sweeney & Associates, Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Patrick M. Sweeney & Associates, Inc. is a registered investment advisor. Registration with the United States Securities and Exchange Commission or any state securities authority as an investment advisor does not imply a certain level of skill or training.

May 13, 2020

Patrick M. Sweeney & Associates, Inc.

## Material Changes

---

### **Annual Update**

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure and provide a summary of such changes.

---

### **Material Changes since the Last Update**

There are no material changes in this brochure from the last annual updating amendment of Patrick M. Sweeney & Associates, Inc. on February 28, 2020.

---

### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 847-277-7771 or visit our website at [patrickmsweeney.com](http://patrickmsweeney.com). You can also email: [Patrick@patrickmsweeney.com](mailto:Patrick@patrickmsweeney.com).

# Table of Contents

|  |          |
|--|----------|
| <b>Material Changes</b> .....  | <b>i</b> |
| Annual Update .....  | i        |
| Material Changes since the Last Update .....                             | i        |
| Full Brochure Available .....  | i        |
| <b>Advisory Business</b> .....   | <b>1</b> |
| Firm Description.....  | 1        |
| Principal Owner.....   | 1        |
| Types of Advisory Services.....  | 1        |
| Tailored Relationships .....   | 2        |
| Types of Agreements.....   | 2        |
| Advisory Service Agreement.....  | 2        |
| Financial Planning Agreement.....  | 3        |
| Retainer Agreement.....  | 3        |
| Tax Preparation Agreement.....   | 4        |
| Hourly Planning Engagements.....   | 4        |
| Asset Management .....   | 4        |
| Termination of Agreement .....   | 4        |
| <b>Fees and Compensation</b> .....                                       | <b>4</b> |
| Description.....   | 4        |
| Fee Billing .....  | 5        |
| Other Fees.....  | 5        |
| Past Due Accounts and Termination of Agreement .....                     | 5        |
| <b>Performance-Based Fees and Side-By-Side Management</b> .....          | <b>6</b> |
| Sharing of Capital Gains .....   | 6        |
| <b>Types of Clients</b> .....  | <b>6</b> |
| Description.....   | 6        |
| Account Minimums.....  | 6        |
| <b>Methods of Analysis, Investment Strategies and Risk of Loss</b> ..... | <b>6</b> |
| Methods of Analysis.....   | 6        |
| Investment Strategies .....  | 7        |
| Risk of Loss .....   | 7        |

|  |           |
|--|-----------|
| <b>Disciplinary Information .....</b>  | <b>9</b>  |
| Legal and Disciplinary.....  | 9         |
| <b>Other Financial Industry Activities and Affiliations .....</b>                                  | <b>9</b>  |
| Financial Industry Activities.....   | 9         |
| Affiliations .....   | 9         |
| <b>Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....</b> | <b>9</b>  |
| Code of Ethics.....  | 9         |
| Participation or Interest in Client Transactions.....  | 10        |
| Personal Trading.....  | 10        |
| <b>Brokerage Practices.....</b>  | <b>10</b> |
| Selecting Brokerage Firms.....   | 10        |
| Best Execution .....   | 11        |
| Soft Dollars .....   | 11        |
| Order Aggregation .....  | 11        |
| Trade Errors.....  | 11        |
| <b>Review of Accounts .....</b>  | <b>12</b> |
| Periodic Reviews .....   | 12        |
| Review Triggers .....  | 12        |
| Regular Reports.....   | 12        |
| <b>Client Referrals and Other Compensation .....</b>   | <b>12</b> |
| Incoming Referrals.....  | 12        |
| Referrals Out .....  | 12        |
| <b>Custody.....</b>  | <b>12</b> |
| Account Statements.....  | 12        |
| Performance Reports.....   | 13        |
| <b>Investment Discretion.....</b>  | <b>13</b> |
| Discretionary Authority for Trading.....   | 13        |
| Limited Power of Attorney.....   | 13        |
| <b>Voting Client Securities .....</b>  | <b>13</b> |
| Proxy Votes.....   | 13        |
| <b>Financial Information .....</b>   | <b>13</b> |

|   |           |
|---|-----------|
| Financial Condition .....                               | 13        |
| <b>Information Security Program.....</b>                | <b>14</b> |
| Information Security .....                              | 14        |
| Privacy Notice .....                                    | 14        |
| <b>Requirements for State-Registered Advisors .....</b> | <b>15</b> |
| Education and Business Standards .....                  | 15        |
| Professional Certifications .....                       | 15        |
| PATRICK M. SWEENEY, CPA, CFP® .....                     | 16        |

# Advisory Business

---

## Firm Description

Patrick M. Sweeney & Associates, Inc. was founded in 2001. Our principal office and place of business is located at 18-1 East Dundee Road, Suite 150, Barrington, Illinois 60010. Regular business hours are 8:30am to 5:00pm Monday through Friday CST.

Patrick M. Sweeney & Associates, Inc. provides personalized confidential investment management and financial planning to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Patrick M. Sweeney & Associates, Inc. does not act as a custodian of client assets. The client always maintains asset control. Patrick M. Sweeney & Associates, Inc. places trades for clients under a limited power of attorney.

A written evaluation of each client's initial situation is available to the client, often in the form of a net worth statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which investment management and financial planning may be beneficial to the client.

---

## Principal Owner

Patrick M. Sweeney is the firm's principal owner.

---

## Types of Advisory Services

Patrick M. Sweeney & Associates, Inc. provides investment supervisory services, also known as asset management services on a discretionary and non-discretionary basis. In addition, the firm manages investment advisory accounts not involving investment supervisory services and furnishes investment advice through consultations or other devices which clients may use to evaluate securities.

On more than an occasional basis, Patrick M. Sweeney & Associates, Inc. furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

As of December 31, 2019, Patrick M. Sweeney & Associates, Inc. managed \$118,879,700 on a discretionary basis and \$7,768,503 on a non-discretionary basis.

---

### **Tailored Relationships**

The scope of each client's relationship is determined by mutually agreed upon goals, objectives, and risk tolerance. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

---

### **Types of Agreements**

The following agreements define the typical client relationships.

---

### **Advisory Service Agreement**

Most clients choose to have Patrick M. Sweeney & Associates, Inc. manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed, including those of their children. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the client prior to the start of the relationship. An Advisory Service Agreement includes: cash flow management; insurance review; investment management (including performance reporting); education planning; retirement planning; estate planning; and tax preparation, as well as the implementation of recommendations within each area.

The annual Advisory Service Agreement fee is based on a percentage of the investable assets according to the following schedule:

8/10ths of 1% on account values less than \$500,000;

6/10ths of 1% on accounts values more than \$500,000.

The minimum annual fee is \$800 and may be negotiable. Current client relationships may exist where the fees are higher or lower than the fee schedule above. We retain the discretion to negotiate alternative fees on a client-by-client basis.

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an

agreement by ten days' written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed.

Tax preparation work is performed as an integral part of the Advisory Service Agreement. These services may be performed as part of the Advisory Service Agreement or on an hourly basis.

---

### **Financial Planning Agreement**

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

The fee for a financial plan is predicated upon the facts known at the start of the engagement. The minimum fee is \$800 and may be negotiated. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary for up to six months. Follow-on implementation work is billed separately at the rate of \$200 per hour.

---

### **Retainer Agreement**

In some circumstances, a *Retainer Agreement* is executed in lieu of an *Advisory Service Agreement* when it is more appropriate to work on a fixed-fee basis. The annual fee for a *Retainer Agreement* is \$800 and is may be negotiable.



---

**Tax Preparation Agreement**

Tax preparation work may be included in the *Advisory Service Agreement* or *Retainer Agreement* scope of work.

Tax preparation work performed separately from an *Advisory Service Agreement* or a *Retainer Agreement* is billed at a flat rate agreed upon by the client. Eligible federal and applicable state returns are filed electronically without an additional fee.

---

**Hourly Planning Engagements**

Patrick M. Sweeney & Associates, Inc. provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$200.

---

**Asset Management**

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. Patrick M. Sweeney & Associates, Inc. does not receive any compensation, in any form, from brokerage houses or fund companies.

Investments may also include: exchange-traded funds, corporate debt securities, certificates of deposit, municipal securities, investment company securities as mutual funds shares, and U. S. government securities. Initial public offerings (IPOs) are not available through Patrick M. Sweeney & Associates, Inc.

---

**Termination of Agreement**

A Client may terminate any of the aforementioned agreements without penalty at any time by notifying Patrick M. Sweeney & Associates, Inc. in writing with ten days' written notice, and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. We do not currently accept advance payments; however, if the client made an advance payment, Patrick M. Sweeney & Associates, Inc. will refund any unearned portion of the advance payment.

Patrick M. Sweeney & Associates, Inc. may terminate any of the aforementioned agreements at any time by notifying the client in writing with ten days' notice. If the client made an advance payment, Patrick M. Sweeney & Associates, Inc. will refund any unearned portion of the advance payment.

## **Fees and Compensation**

---

**Description**

Patrick M. Sweeney & Associates, Inc. bases its fees on a percentage of assets under management, hourly charges, and fixed fees.

Some *Retainer Agreements* may be priced based on the complexity of work, especially when asset management is not the most significant part of the relationship.

Financial plans are priced according to the degree of complexity associated with the client's situation.

Fees are negotiable and further outlined in the previous sections defining types of agreements.

---

### **Fee Billing**

Investment management fees are billed quarterly, in arrears, based upon the value of the account as of the last day of the current quarter. In arrears means that we invoice you after the three-month billing period has ended. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Fees for financial plans are billed upon delivery of the financial plan.

Patrick M. Sweeney & Associates, Inc. is strictly a fee-only investment management and financial planning firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted.

---

### **Other Fees**

Patrick M. Sweeney & Associates, Inc., in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

New Advisory Service Agreement fees are calculated on a formula basis and adjusted for complexity of individual situations. *The formula is based on gross income, gross assets and other financial considerations.*

---

### **Past Due Accounts and Termination of Agreement**

Patrick M. Sweeney & Associates, Inc. reserves the right to stop work on any account that is more than 180 days overdue. In addition, Patrick M. Sweeney & Associates, Inc. reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in Patrick M. Sweeney & Associates, Inc.'s judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

## Performance-Based Fees and Side-By-Side Management

---

### Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Patrick M. Sweeney & Associates, Inc. does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

## Types of Clients

---

### Description

Patrick M. Sweeney & Associates, Inc. generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations.

Client relationships vary in scope and length of service.

---

### Account Minimums

The minimum new account size is \$500,000 of assets under management.

Patrick M. Sweeney & Associates, Inc. has the discretion to waive the account minimum. Accounts of less than \$500,000 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total to \$500,000 within a reasonable time. Other exceptions will apply to employees of Patrick M. Sweeney & Associates, Inc. and their relatives, existing clients as of December 31, 2010, or relatives of existing clients.

## Methods of Analysis, Investment Strategies and Risk of Loss

---

### Methods of Analysis

Security analysis methods include fundamental analysis and may also include charting, technical analysis, and cyclical analysis.

The main sources of information include research materials prepared by others, inspections of corporate activities, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases, financial newspapers and magazines, and corporate rating services.

Other sources of information that Patrick M. Sweeney & Associates, Inc. may use include research materials provided by Charles Schwab & Company and information found on the Internet.

---

## Investment Strategies

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

Strategies may include options, long-term purchases, short-term purchases, trading, short sales, and margin transactions.

**Options** are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option writing also involves risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

---

## Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, exchange-traded fund or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security’s particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment’s originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligation in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Frequency Risk:** The frequent trading of securities can affect performance, particularly through increased brokerage and other transaction costs and taxes

## Disciplinary Information

---

### Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

## Other Financial Industry Activities and Affiliations

---

### Financial Industry Activities

Patrick M. Sweeney & Associates, Inc. is not registered as a securities broker-dealer, or a futures commission merchant, commodity pool operator or commodity trading advisor.

### Affiliations

PATRICK M. SWEENEY & ASSOCIATES, INC. has no affiliations that are material to its advisory or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

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

---

### Code of Ethics

Patrick M. Sweeney & Associates, Inc.'s Code of Ethics has been adopted to comply with Rule 204A-1 under the Investment Advisers Act of 1940 ("Advisers Act"). This Code of Ethics is designed to ensure the high ethical standards long maintained by Patrick M. Sweeney & Associates, Inc. will continue to be applied. The purpose of the Code of Ethics is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct.

The excellent name and reputation of our company continues to be a direct reflection of the conduct of each employee. If you would like a copy of our Code of Ethics please call 847-277-7771 and request a copy.

---

### **Participation or Interest in Client Transactions**

Patrick M. Sweeney & Associates, Inc. and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the Patrick M. Sweeney & Associates, Inc.'s Policies and Procedures Manual.

---

### **Personal Trading**

The Chief Compliance Officer of Patrick M. Sweeney & Associates, Inc. is Patrick M. Sweeney. He reviews all employee trades each quarter. The personal trading reviews ensure that clients of the firm receive preferential treatment and that the personal trading of employees does not affect the markets.

## **Brokerage Practices**

---

### **Selecting Brokerage Firms**

Patrick M. Sweeney & Associates, Inc. does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. Patrick M. Sweeney & Associates, Inc. recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

Patrick M. Sweeney & Associates, Inc. recommends discount brokerage firms and trust companies (qualified custodians), such as Charles Schwab & Co. Please note that Patrick M. Sweeney & Assoc. Inc. will only refer clients to dealers registered in the states where the clients reside.

Patrick M. Sweeney & Associates, Inc. does not receive fees or commissions from any of these arrangements.

Schwab provides Patrick M. Sweeney & Associates, Inc. with access to its institutional trading and custody services, which are typically on an unsolicited basis, at no charge to them as long as advisor's clients' assets are maintained in accounts at Schwab Institutional, and access is not otherwise contingent upon advisor committing to Schwab any specific amount of business (assets in custody or trading). Schwab's services include brokerage, 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.

Schwab also makes available to Patrick M. Sweeney & Associates, Inc. other products and services that benefit all of its clients' accounts. Some of

these other products and services assist Patrick M. Sweeney & Associates, Inc. in managing and administering clients' accounts. These include software and other technology that provide access to client account data; facilitate trade execution; provide research, pricing information and other market data; facilitate payment of Patrick M. Sweeney & Associates, Inc.'s fees from its clients' accounts; and assist with back-office functions, record keeping, client reporting, and billing. Schwab Institutional also makes available to Patrick M. Sweeney & Associates, Inc. other services intended to help manage and further develop its business. These services may include consulting, publications and conferences on practice management, information technology, business succession, and regulatory compliance. In addition, Schwab may make available, arrange and/or pay for these types of services rendered to Patrick M. Sweeney & Associates, Inc. by independent third parties. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or some of the fees of a third-party providing these services to Patrick M. Sweeney & Associates, Inc.

---

**Best Execution**

Patrick M. Sweeney & Associates, Inc. reviews the execution of trades at each custodian each quarter. The review is documented in the Patrick M. Sweeney & Associates, Inc. compliance files. Trading fees charged by the custodians is also reviewed on a quarterly basis. Patrick M. Sweeney & Associates, Inc. does not receive any portion of the trading fees.

Please note that for clients who initiate their own trading, they may not be able to obtain the best execution price, commission or speed as they may by directing the trade to be done by Patrick M. Sweeney & Associates, Inc.

---

**Soft Dollars**

Patrick M. Sweeney & Associates, Inc. does not receive any monetary compensation or credits from Charles Schwab & Co.

---

**Order Aggregation**

Security purchases for clients are individualized and limit Patrick M. Sweeney & Associates, Inc.'s ability to aggregate orders for clients.

---

**Trade Errors**

Patrick M. Sweeney & Associates corrects all trade errors through its accounts at Schwab. The firm will be responsible for any loss by a client due to its trade error. Any gain due to a trade error will be retained by Schwab.



## Review of Accounts

---

### Periodic Reviews

Account reviews are performed quarterly by advisor Patrick M. Sweeney. Account reviews are performed more frequently when market conditions dictate.

---

### Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

---

### Regular Reports

Clients receive periodic communications on at least an annual basis. *Advisory Service Agreement* clients, *Investment Management* clients, and *Retainer Agreement* clients receive written quarterly updates. The written updates may include a net worth statement, portfolio statement, tax return (if the client requests tax preparation services), and a summary of objectives and progress towards meeting those objectives.

## Client Referrals and Other Compensation

---

### Incoming Referrals

Patrick M. Sweeney & Associates, Inc. has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

On an occasional basis, Patrick M. Sweeney & Associates may make charitable contributions to client-directed charities.

---

### Referrals Out

Patrick M. Sweeney & Associates, Inc. does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

---

## Custody

---

### Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

---

## **Performance Reports**

Clients are urged to compare the account statements received directly from their custodians to the performance report statements, prepared by the custodians, and provided by Patrick M. Sweeney & Associates, Inc.

## **Investment Discretion**

---

### **Discretionary Authority for Trading**

Patrick M. Sweeney & Associates, Inc. provides discretionary and non-discretionary investment advisory services to clients. For accounts where Patrick M. Sweeney & Associates, Inc. will have discretion, the Investment Advisory Contract established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, Patrick M. Sweeney & Associates, Inc. generally manages the client's account and makes investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, or the price per share. In some instances, Patrick M. Sweeney & Associates, Inc.'s discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to Patrick M. Sweeney & Associates, Inc.).

---

### **Limited Power of Attorney**

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

## **Voting Client Securities**

---

### **Proxy Votes**

Patrick M. Sweeney & Associates, Inc. does not vote proxies on securities. Clients are expected to vote their own proxies and will receive the necessary information directly from their custodian or a transfer agent.

When assistance on voting proxies is requested, Patrick M. Sweeney & Associates, Inc. will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

## **Financial Information**

---

### **Financial Condition**

Patrick M. Sweeney & Associates, Inc. does not have any financial impairment that will preclude the firm from meeting contractual commitments

to clients.

A balance sheet is not required to be provided because Patrick M. Sweeney & Associates, Inc. does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$500 per client, and six months or more in advance.

## **Information Security Program**

---

### **Information Security**

Patrick M. Sweeney & Associates, Inc. maintains an information security program to reduce the risk that your personal and confidential information may be breached.

---

### **Privacy Notice**

Patrick M. Sweeney & Associates, Inc. is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. You should contact Patrick Sweeney at (847) 277-7771. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be

maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this Privacy Notice to you annually, in writing.

## Requirements for State-Registered Advisors

---

### Education and Business Standards

Patrick M. Sweeney & Associates, Inc. requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for investment management and financial planning.

---

### Professional Certifications

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

Certified Public Accountant (CPA): Certified Public Accountant is a statutory title developed by the American Institute for Certified Public Accountants (AICPA). CPA requirements:

- Bachelor's degree from an accredited college or university.
- Successful completion of the Uniform Certified Public Accountant Examination.
- Two-year qualifying full-time work experience.

Certified Financial Planner (CFP): Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board ([www.cfp.net](http://www.cfp.net)).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

---

**PATRICK M. SWEENEY, CPA, CFP®****Educational Background:**

- Year of birth: 1961
- Lewis University: Romeoville, Illinois  
B.A. in Accounting: May 1983
- Certified Public Accountant: November 1985
- Certified Financial Planner: June 1995

**Business Experience:**

- Patrick M. Sweeney & Associates: 2001 to Present  
President, Owner

**Disciplinary Information:**

- Registered investment advisor representatives are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of the representative. Mr. Sweeney is currently not subject to, nor has ever been subject to any legal or disciplinary events.

**Other Business Activities**

- As described in the Advisory Business section of this brochure, in addition to investment management and financial planning Mr. Sweeney also provides tax preparation services.

**Additional Compensation:**

- Mr. Sweeney does not receive and economic benefits, sales awards, or other compensation in connection with providing advisory services to clients.

**Supervision:**

- Patrick M. Sweeney is the sole owner of Patrick M. Sweeney & Associates, Inc. and consequently does not report to a supervisor.

**Requirement for State-Registered Advisors:**

- State registered investment advisors are required to disclose all material facts regarding certain legal, disciplinary, or financial events that would be material of the representative. Mr. Sweeney currently has no arbitration claims, self-regulatory organization or administrative proceedings, or bankruptcy petitions.