

PART 2A OF FORM ADV: FIRM BROCHURE

Vista360 Client Instructions:

The key to successfully complying with the SEC’s new disclosure requirements is to organize your firm’s practices and conflicts prior to drafting the actual disclosure. This Road Map serves as a solid base to capture the required information in order to draft your Form ADV Part 2.

One of the primary components of the new rule is the disclosure of the conflicts of interest resulting from your business practices. Therefore, we have structured this form to identify both your actual business practices and conflicts of interest related to those practices. Once the form is complete, we will use the information provided on this Road Map to draft the Form ADV Part 2 keeping in mind the Plain-English requirement. For further guidance, the [SEC’s instructions to Form ADV](#) provide general instructions, answers to frequently asked questions, and detailed expectations for each Item below.

The table below contains the following components:

- **Old ADV Item:** This column references where each item required by the new form was addressed in the previous form, if applicable.
- **Business Practices:** This column includes: (1) potential business practices to consider and (2) a description of your actual business practices to be disclosed. If you do not engage in a potential business practice listed below, the item must be addressed but no disclosure about that topic may be required. We updated this section with your business practices to best of our knowledge; however, **there may be additional business practices which must be disclosed**. Please review our additions for accuracy and completeness, and make any necessary changes.
- **Conflicts of Interest:** This column includes: (1) potential conflicts of interest that may result from your business practices and (2) a description of your actual conflicts of interest to be disclosed. If the potential conflicts listed below are not applicable, no disclosure about that conflict is required. For conflicts disclosed, describe your process for addressing the conflicts. We updated this section with the conflicts of interest we believe apply to your firm; however, **there may be additional conflicts of interest which must be disclosed**. Please review our additions for accuracy and completeness, and make any necessary changes.
- **Status/Comments:** This column should be used by adviser and Vista360 staff to communicate additional questions and/or comments as appropriate.

Old ADV Item	Business Practices	Conflicts of Interest	Status/Comments
Front page	Item 1: Cover Page		
	<ul style="list-style-type: none"> • Name, business address, contact information, website address, brochure date • Required SEC statement: “This brochure provides information about the qualifications and business practices of [adviser]. If you have any questions about the contents of this brochure, please contact us at [phone number/email address]. The information in this brochure has not been approved or verified by the United States Securities and Exchange 	N/A	

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	<p>Commission or by any state securities authority.</p> <p>Additional information about [adviser] also is available on the SEC’s website at www.adviserinfo.sec.gov.”</p> <ul style="list-style-type: none"> • Disclosure that registration does not imply certain level of skill or training. 		
N/A	Item 2: Material Changes		
	<ul style="list-style-type: none"> • If amending brochure for annual update, identify material changes on cover page, page immediately following or separate document. 	N/A	<ul style="list-style-type: none"> • Not required for initial filing, just on a going-forward basis.
Front page	Item 3: Table of Contents		
	<ul style="list-style-type: none"> • Include a TOC following the same order as items listed in this document. • Note: all items must be included even if they are not applicable to your business. 	N/A	
1	Item 4: Advisory Business		
	<p><u>Disclosure Topics:</u></p> <ul style="list-style-type: none"> • Describe firm, how long in business, principal owners • Type of advisory services offered • Whether and how you tailor services (e.g., do you allow restrictions) • Whether you participate in wrap fee programs by providing portfolio management services, and if so: <ul style="list-style-type: none"> ○ Describe differences between managing wrap accounts vs. other accounts ○ Explain that you receive a portion of the wrap fee for your services • Amount of client assets managed on a discretionary and non-discretionary basis 	<p><u>Potential Conflicts:</u></p> <ul style="list-style-type: none"> • Employees serving dual roles may result in a conflict (e.g., CCO/GC or CCO/CFO) 	<ul style="list-style-type: none"> • Conflicts associated with wrap fee program participation (e.g., incentive to trade and manage accounts in a different manner than other accounts) are addressed under Item 12 • If your method for calculating AUM is different from Item 5F in Part 1A, you must keep documentation supporting your calculations, including the method utilized.
	<u>Actual Business Practices:</u>	<u>Actual Conflicts:</u>	

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Old ADV Item	Business Practices	Conflicts of Interest	Status/Comments
	•	•	
1	Item 5: Fees and Compensation		
	<p><u>Disclosure Topics:</u></p> <p>Fees</p> <ul style="list-style-type: none"> • Discuss how paid (e.g., asset-based fees) • Provide standard fee schedule (unless all clients are qualified purchasers) and whether fees are negotiable • Deduct or bill fees • Describe the general nature of any other fees (e.g., custodian fees, fund expenses or brokerage/transaction costs, mutual fund distribution /12b-1 fees) client may pay. • Advance payment of fees and how clients may obtain refund if account is terminated before end of billing period • Whether you receive sales-based compensation (securities or funds) • Most Favored Nation clauses <p>Valuation</p> <ul style="list-style-type: none"> • Valuation practices <ul style="list-style-type: none"> ○ Manual/fair valuation ○ Pricing vendors 	<p><u>Potential Conflicts:</u></p> <p>Fees</p> <ul style="list-style-type: none"> • Incentive to recommend securities or funds with commissions or sales charges • Incentive to charge proprietary accounts less than non-proprietary accounts for the same services <p>Valuation</p> <ul style="list-style-type: none"> • Incentive to fair value to increase assets, performance and fees • Incentive to fair value to decrease assets in workout situations or to avoid violating investment guidelines • Portfolio Managers assist in valuations of clients securities in which they have a vested interest 	<p>If applicable, consider including the following:</p> <ul style="list-style-type: none"> • “There are inherent conflicts of interest as a result of the different types of clients serviced and the fees paid by those clients. We have policies and procedures designed to mitigate those conflicts.” • If you receive soft dollar benefits, consider a reference to Item 12 here. The SEC may view these benefits as compensation.
	<p><u>Actual Business Practices:</u></p> <p style="text-align: center;">•</p>	<p><u>Actual Conflicts:</u></p> <p style="text-align: center;">•</p>	
N/A	Item 6: Performance-Based Fees and Side-by-Side Management		
	<p><u>Disclosure Topics:</u></p> <ul style="list-style-type: none"> • Performance-based fees • Side-by-side management of performance-based and asset-based fee accounts 	<p><u>Potential Conflicts:</u></p> <ul style="list-style-type: none"> • Incentive to favor performance-based accounts (private funds/commingled products) over asset-based accounts (mutual funds/SMAs) 	