

**FORM ADV Uniform Application for Investment Adviser Registration
Part 2A: Investment Adviser Brochure and Brochure Supplements
Item 1: Cover Page**

Curbstone Financial Management Corporation

**741 Chestnut St.
Manchester, NH 03104
(603) 624-8462**

www.curbstonefinancial.com

**SEC File # 801-67354
Firm CRD#: 13348**

June 18, 2024

This brochure provides information about the qualifications and business practices of Curbstone Financial Management Corporation. If you have any questions about the contents of this brochure, please contact us at the phone number listed above.

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. Please note, where this brochure may use the terms "registered investment adviser" and/or "registered", registration itself does not imply a certain level of skill or training.

Additional information about the firm is also available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Material Changes

The purpose of this Item 2 is to disclose material changes that have been made to this Brochure since the last annual update of this Brochure.

Since the filing of our last annual updating amendment, dated June 28, 2023, we have no material changes to report.

Item 3 Table Of Contents

Item 1 Cover Page	Page 1
Item 2 Material Changes	Page 2
Item 3 Table Of Contents	Page 3
Item 4 Investment Advisory Business	Page 4
Item 5 Fees and Compensation	Page 5
Item 6 Performance-Based Fees and Side by Side Management	Page 6
Item 7 Types of Clients	Page 6
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss	Page 6
Item 9 Disciplinary Information	Page 8
Item 10 Other Financial Industry Activities and Affiliations	Page 8
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	Page 9
Item 12 Brokerage Practices	Page 9
Item 13 Review of Accounts	Page 12
Item 14 Client Referrals and Other Compensation	Page 12
Item 15 Custody	Page 12
Item 16 Investment Discretion	Page 13
Item 17 Voting Client Securities	Page 13
Item 18 Financial Information	Page 14

Item 4 Investment Advisory Business

Established in 1983, Curbstone Financial Management Corporation ("Curbstone") is a SEC registered investment adviser. The firm has three owners, Thomas M. Lewry, Melvin J. Severance III, and Pamela Diamantis. Thomas Lewry is the firm's President and primary owner.

Investment management is the foundation of Curbstone Financial Management Corporation's services, provided on a discretionary basis. The Firm's management style emphasizes an asset allocation discipline sensitive to each client's return requirements, tolerance for risk, time horizon and income needs. Based on these factors, the Firm and the client collaboratively agree on an appropriate investment objective, memorializing the goal and the desired asset allocation in the Investment Policy Statement. Curbstone then constructs a portfolio that aligns with the client's objective. Curbstone will honor any reasonable investment restrictions imposed by the client, provided that the instructions are in writing.

In working with clients, the Firm assists clients in thinking holistically about their financial circumstances. These discussions may go beyond the immediate investment management need. In such cases, Curbstone does not receive any additional compensation beyond the investment management fee, nor is the Firm responsible for the implementation of any planning recommendations that result from such discussions.

Curbstone utilizes an in-house, independent investment management process that keeps the client's interest in the forefront of all decision-making.

Curbstone accepts qualified plan "rollover" accounts in adherence with applicable regulatory requirements. The firm works to ensure that potential clients fully understand the options available to them including the option of leaving the assets in their employer-sponsored plan.

Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, Curbstone is providing the following acknowledgment to you. When Curbstone provides investment advice to clients regarding retirement plan accounts or individual retirement accounts, Curbstone is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way Curbstone makes money creates some conflicts with clients' interests, so Curbstone operates under a special rule that requires Curbstone to act in clients' best interest and not put Curbstone's interest ahead of clients. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

Curbstone benefits financially from the rollover of client assets from a retirement account to an account that Curbstone manages or provides investment advice, because the assets increase Curbstone's assets under management and, in turn, Curbstone's advisory fees. As a fiduciary, Curbstone only recommends a rollover when Curbstone believes it is in client's best interest.

As of March 31, 2024, Curbstone had a total of \$372,014,245 in discretionary client assets under management.

Item 5 Fees and Compensation

All advisory clients are billed quarterly, in advance of the calendar quarter, for advisory services rendered by Curbstone. Quarterly billings are calculated based upon one fourth of the following annual rates:

Fee Schedule

<u>Assets</u>	<u>Fee Rate</u>
On the first \$2,000,000	1.00%
On the next \$3,000,000	0.85%
Balance over \$5,000,000	0.50%

A non-profit agency may be granted a 10% discount.

Discounts may be extended to clients accounts predominantly invested in ETFs and Mutual Funds.

Fees are expressed on an annualized basis and assessed quarterly in advance based on the market value of assets on the last trading day of each calendar quarter. Management fees are typically directly debited from client accounts by the qualified custodian or broker-dealer, as authorized by a Limited Power of Attorney granted by the client. These fees may be negotiable in advance under certain circumstances, at the sole discretion of the firm.

All fees to Curbstone for investment advisory services are separate and distinct from the fees and expenses that clients may be charged by mutual fund and exchange traded fund sponsors along with brokerage commissions. Fees charged by mutual funds and exchange traded funds are described in each fund's prospectus and are available online or can be provided by Curbstone upon request. Accordingly, clients should review the aggregate fees charged by Curbstone and any investment vehicles utilized to fully appreciate the total amount of fees paid.

Curbstone and/or the client may terminate the investment management contract at any time. Upon termination, any investment management fees paid in advance will be prorated to the date of termination and any excess shall be refunded to the client.

Additional Fees and Expenses

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or

custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, refer to the *Brokerage Practices* section of this brochure.

Item 6 Performance-Based Fees and Side by Side Management

Curbstone's advisory services do not incorporate performance fees or the offering of any additional investment services.

Item 7 Types of Clients

Curbstone provides investment management services to individuals, high net worth investors, endowments, charitable organizations, pension and profit-sharing plans, and corporations.

Curbstone does not stipulate a minimum account size. Prospective clients will be accepted upon review and at the sole discretion of the firm.

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

Curbstone offers a single investment strategy, defined as the Enhanced Relative Return Strategy. The Investment Policy Statement guides the portfolio construction ensuring that the asset allocation strategy aligns with the client's investment objectives. Individual stocks and bonds, mutual funds, exchange traded funds and money market funds can be utilized in the management of the client's assets. Broad diversification, quality and liquidity along with the desire to minimize the overall cost structure of the portfolio are all factors taken into consideration in the investment management process.

Description of the Enhanced Relative Return Strategy follows:

Enhanced Relative Return establishes asset allocation ranges for the three major asset classes: stocks; bonds; money market funds. The portfolio is then broadly diversified among domestic and international securities with the goal of adding incremental return adjusted for risk over the client's investment objective.

Curbstone's portfolios are managed on a discretionary basis through a limited power of attorney granted by the client. The firm periodically implements changes to specific holdings and to the asset allocation strategy based upon its internal analysis, always with consideration of the client's selected risk profile outlined in the Investment Policy Statement. Curbstone buys and sells securities for reasons that include but are not limited to, harvesting capital gains or losses, market or sector risk/opportunities, exposure to a specific asset classes or segments, over/under valuation, trimming of an overweighted position or change in the client's risk tolerance and/or financial goals.

Risk of Loss: Investing in securities involves a certain amount of risk of loss that clients should be prepared to bear. Trading frequency may, at times, increase or decrease due to market volatility. Short term trading methods are not generally employed by Curbstone.

Fundamental Analysis is employed in an attempt to determine a security's intrinsic value by examining various qualitative and quantitative factors. Curbstone's process looks at, but is not limited to, the analysis of a company's financial condition and management's effectiveness, profitability, use of

capital, competitive position and the sustainability of the business. A primary risk in using fundamental analysis is that while the overall health and relative value of a company may be attractive, market conditions may negatively impact the market value of the company's shares.

Technical Analysis involves the analysis of past market data rather than specific company data in determining whether the security should be bought or sold. The use of charts helps to identify market patterns and trends which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict future trends.

We recommend various types of securities and we do not primarily recommend one particular type of security over another since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with the investment. A description of the types of securities we may recommend to you and some of their inherent risks are provided below.

Stocks: There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and, the overall health of the economy. In general, larger, better established companies ("large cap") tend to be safer than smaller start-up companies ("small cap") are but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

Bonds: Corporate debt securities (or "bonds") are typically safer investments than equity securities, but their risk can also vary widely based on: the financial health of the issuer; the risk that the issuer might default; when the bond is set to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same rate of return.

Money Market Funds: A money market fund is technically a security. The fund managers attempt to keep the share price constant at \$1/share. However, there is no guarantee that the share price will stay at \$1/share. If the share price goes down, you can lose some or all of your principal. The U.S. Securities and Exchange Commission ("SEC") notes that "While investor losses in money market funds have been rare, they are possible." In return for this risk, you should earn a greater return on your cash than you would expect from a Federal Deposit Insurance Corporation ("FDIC") insured savings account (money market funds are not FDIC insured). Next, money market fund rates are variable. In other words, you do not know how much you will earn on your investment next month. The rate could go up or go down. If it goes up, that may result in a positive outcome. However, if it goes down and you earn less than you expected to earn, you may end up needing more cash. A final risk you are taking with money market funds has to do with inflation. Because money market funds are considered to be safer than other investments like stocks, long-term average returns on money market funds tends to be less than long term average returns on riskier investments. Over long periods of time, inflation can eat away at your returns.

Mutual Funds and Exchange Traded Funds: Mutual funds and exchange traded funds ("ETF") are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification,

risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. ETFs differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

ETFs may have tracking error risks. For example, the ETF investment adviser may not be able to cause the ETF's performance to match that of its Underlying Index or other benchmark, which may negatively affect the ETF's performance. In addition, for leveraged and inverse ETFs that seek to track the performance of their Underlying Indices or benchmarks on a daily basis, mathematical compounding may prevent the ETF from correlating with performance of its benchmark. In addition, an ETF may not have investment exposure to all of the securities included in its Underlying Index, or its weighting of investment exposure to such securities may vary from that of the Underlying Index. Some ETFs may invest in securities or financial instruments that are not included in the Underlying Index, but which are expected to yield similar performance.

Item 9 Disciplinary Information

Investment advisers are required to provide clients with disclosure as to any legal or disciplinary activities deemed material to the client's evaluation of the adviser. Neither the firm nor its personnel have any disciplinary, regulatory, criminal, civil, or otherwise applicable history to report.

Item 10 Other Financial Industry Activities and Affiliations

Effective in 2017, Pamela Diamantis, Principal of Curbstone, serves as General Partner to the IMPACT NH SERIES FUND, LP. IMPACT NH SERIES FUND, LP, is anticipated to be no more than \$1,000,000 Limited Partnership fund being formed for the purposes of (1) encouraging women to engage as angel investors, (2) providing the educational element that will assist in the development of new angel investors, (3) providing capital for businesses with women CEOs and/or substantial participation of women in executive management, (4) assisting businesses domiciled in New Hampshire or those that have a majority of their operations in New Hampshire, and (5) providing investments on company-friendly terms. The Limited Partnership interests being offered hereby have not been registered under the U.S. Securities Act of 1933, as amended, and will be offered in reliance upon an exemption from such act. No public market exists or will develop for the partnership interests. Investors in this partnership are required to be accredited investors. The partnership will not invest in nor conflict with the investment advisory activities of Curbstone Financial Management Corporation in any way, and will not invest in the same securities which may be offered to Curbstone clients. Due to inherent conflicts of interest, clients of Curbstone are not eligible to participate in the offering, and no client of Curbstone will be solicited to participate in the offering. Ms. Diamantis will not receive any compensation for her services as General Partner.

Effective in 2018, Pamela Diamantis, a Principal of Curbstone, joined the board of Primary Bank as a director and shareholder. Primary Bank is based in New Hampshire and is regulated by the NH Banking Department and the FDIC. As a commercial bank, Primary Bank strives to meet the needs of local businesses. The bank does not and will not invest in nor conflict with the activities of Curbstone

Financial Management Corporation. Clients of Curbstone are not encouraged or required to utilize the services of Primary Bank. Ms. Diamantis does receive directors and committee member fees for her services.

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

Curbstone maintains a fiduciary and ethical obligation to place its clients' interests first. The firm, pursuant to Rule 204A-1 of the Investment Advisers Act of 1940, has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all employees of the firm. The Code of Ethics describes Curbstone's fiduciary duties and obligations to clients, and sets forth the firm's practice of supervising the personal securities transactions of employees who have access to client transaction information.

Employees and related persons of the firm, including but not limited to, Curbstone's investment adviser representatives, may invest in the same securities (or related securities, e.g. warrants, options or futures) that the firm or its related persons buys or sells for client portfolios. To avoid conflicts of interest, orders for employees' or related persons' accounts may be aggregated with orders for client accounts as long as they participate on the same terms and adhere to the Code of Ethics.

Curbstone collects and maintains records of securities holdings and transactions made by employees. The firm's CCO reviews the personal trading practices of its employees to identify and resolve any potential or realized deviations from policy.

A copy of Curbstone's Code of Ethics will be made available for review upon request.

Item 12 Brokerage Practices

We utilize the brokerage and custodial services of Charles Schwab. Charles Schwab does not charge a custody fee. Client assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. In recognition of the value of the services the Custodian provides, clients may pay higher execution costs than those that may be available elsewhere. Our selection of custodian is based on many factors, including the level of services provided, the custodian's financial stability, and the cost of services provided by the custodian to our clients, which includes the yield on cash sweep choices, commissions, custody fees and other fees or expenses.

We seek to utilize a custodian/broker that will hold your assets and execute transactions on terms that are, overall, the most favorable compared to other available providers and their services. We consider various factors, including:

- Capability to buy and sell securities for your account itself or to facilitate such services.
- The likelihood that your trades will be executed.
- Availability of investment research and tools.
- Overall quality of services.
- Competitiveness of price.
- Reputation, financial strength, and stability.
- Existing relationship with our firm and our other clients.

Research and Other Soft Dollar Benefits

We do not have any soft dollar arrangements.

Economic Benefits

As a registered investment adviser, we have access to the institutional platform at Charles Schwab. As such, we will also have access to research products and services from your account custodian and/or other brokerage firm. These products may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the implementation of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these firms, and are not considered to be paid for with soft dollars. However, you should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge.

Products and services available to us from Schwab

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. However, certain retail investors may be able to get institutional brokerage services from Schwab without going through us.

Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we do not have to request them) and at no charge to us. Following is a more detailed description of Schwab's support services:

Services that benefit you. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets.

Services that do not directly benefit you. Schwab also makes available to us other products and services that benefit us but do not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts and operating our firm. They include investment research, both Schwab's own and that of third parties. We use this research to service all or a substantial number of our clients' accounts. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services that generally benefit only us. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology and business needs
- Consulting on legal and related compliance needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Schwab provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. Schwab also provides us with other benefits, such as occasional business entertainment of our personnel. If you did not maintain your account with Schwab, we would be required to pay for these services from our own resources.

Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We do not have to pay for Schwab's services. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The fact that we receive these benefits from Schwab is an incentive for us to utilize Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate, our utilization of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services and not Schwab's services that benefit only us.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Directed Brokerage

Clients may direct us to use a particular broker for custodial or transaction services on behalf of the client's portfolio. In directed brokerage arrangements, the client is responsible for negotiating the commission rates and other fees to be paid to the broker. When a client directs brokerage we may be unable to achieve most favorable execution of client transactions, and this practice may cost clients more money and result in a certain degree of delay in executing trades for their account(s) and otherwise adversely impact management of their account(s). Thus, when directing brokerage business, you should consider whether the commission expenses, execution, clearance, and settlement capabilities that you will obtain through your broker are adequately favorable in comparison to those that we would otherwise obtain for you.

Order Aggregation: Whenever possible and/or appropriate, Curbstone will aggregate (block) client orders for accounts purchasing/selling the same security. In allocating securities among clients, it is Curbstone's policy to treat all clients fairly. To avoid "cherry picking", an allocation statement is prepared prior to the placement of the trade detailing the participating accounts. Each client that participates in the aggregated order will receive the average share price realized on the trade. If an order is only partially filled, shares will be allocated on a proportional pro-rata basis.

A particular client may not participate in an aggregated trade based on a number of factors, including but not limited to, investment objective, restrictions, asset allocation, diversification and cash needs.

Mutual Fund Share Classes

Mutual funds are sold with different share classes, which carry different cost structures. Each available share class is described in the mutual fund's prospectus. When we purchase, or recommend the purchase of, mutual funds for a client, we select the share class that is deemed to be in the client's best interest, taking into consideration the availability of advisory, institutional or retirement plan share classes, initial and ongoing share class costs, transaction costs (if any), tax implications, cost basis, and other factors. We also review the mutual funds held in accounts that come under our management to determine whether a more beneficial share class is available, considering cost, tax implications, and the impact of contingent deferred sales charges.

Item 13 Review of Accounts

Curbstone Financial Management Corp. holds formal investment committee meetings at least quarterly. The committee is comprised of Thomas Lewry, Melvin Severance, Pamela Diamantis, and Libby Pomfret. The committee discusses macro and micro economic factors that may impact asset values, investor perceptions and overall investment sentiment. The Investment Management Strategy sheet is reviewed and updated at that time to reflect the consensus of the group.

Individual accounts are regularly monitored and reviewed at least quarterly by each respective manager. Changes are made based on, but not limited to, changing market conditions, share price, asset allocation adjustments and to reflect changes in a client's investment objective. Clients are encouraged to notify the firm of changes to their personal finances, especially those changes that might affect their investment plans.

Clients receive a statement directly from Schwab Institutional on a quarterly basis. Schwab will also issue interim statements any time there is a qualifying transaction – a purchase or sale of a security, a deposit or a withdrawal, etc. Additionally, Curbstone will also provide a quarterly reporting packet that includes an executive summary, a portfolio appraisal and a statement of fees charged. Clients are encouraged to compare the reports provided by Curbstone and Schwab Institutional and immediately report any unexplained differences.

Item 14 Client Referrals and Other Compensation

Charles Schwab & Co., Inc - Institutional

In addition, we receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 - Brokerage Practices). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Curbstone does not receive any additional economic benefit for providing investment advice or advisory services to clients. Curbstone does not directly or indirectly compensate any person who is not under its supervision for client referrals.

Item 15 Custody

Although the firm's assets are held in custody with Schwab Institutional, Curbstone is deemed to have custody of client assets because: A. The client authorizes the firm to deduct advisory fees directly from their account(s) held with a qualified custodian; B. Certain of the Firm's investment adviser representatives may serve as Trustee or Co-Trustee for client trust accounts; and C. Curbstone has been authorized by the client to coordinate payments to a third-party, for example, quarterly federal/state estimated tax payments, gifts and other client specified payments.

Any account on which the investment adviser representative serves as a trustee/co-trustee is subject to an annual surprise audit by an independent CPA or audit firm.

Curbstone may also assist clients with transfer of their assets between two or more of a client's accounts maintained with multiple custodians. When providing this service, in order to avoid assuming custody of the client's funds or securities, Curbstone will ensure that the client has authorized Curbstone in writing to make such transfers and will ensure that a copy of such

authorization is provided to the sending custodian. This authorization shall specify the name and account numbers on the sending and receiving accounts to ensure the sending custodian has a record that the client has identified the accounts for which the transfer is being effected as belonging to the client.

You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

Item 16 Investment Discretion

Curbstone maintains discretionary authority over the selection and amount of securities to be bought or sold in client accounts, as well as the broker or dealer to be used for a purchase or sale of securities without obtaining prior consent or approval from clients. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by the firm.

Discretionary authority will only be authorized upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an agreement containing all applicable limitations to such authority.

Item 17 Voting Client Securities

Where the firm votes proxies on behalf of client accounts, Curbstone has adopted and implemented written Proxy Voting Policies and Procedures ("Proxy Voting Procedures"). These procedures have been designed to reasonably ensure that all proxies are voted in the best interest of the client. The Proxy Voting Procedures describe how the firm addresses voting authority, material conflicts of interest, voting decisions, notification to clients, books and records requirements, etc.

The Proxy Voting Procedures are intended to guide the firm and its personnel in ensuring that proxies are voted in such manner without limiting the firm or its personnel in specific situations to vote in a predetermined manner. These policies are designed to assist Curbstone in identifying and resolving any conflicts of interest with regard to voting client proxies. If the conflict is not specifically addressed in the Proxy Voting Procedures and an apparent or actual conflict exists, Curbstone shall either: i) delegate the voting decision to an independent third party; ii) inform clients of the conflict of interest and obtain advance consent of a majority of such clients for a particular voting decision; or iii) obtain approval of a voting decision from Curbstone's President / CCO, who will be responsible for documenting the rationale for the decision made and voted.

Clients may direct Curbstone to vote a particular proxy, and clients may obtain information about how a proxy has been voted by contacting Curbstone directly.

Clients may obtain information from Curbstone about how the firm voted their proxies and may obtain a copy of the firm's Proxy Voting Procedures by contacting Curbstone directly at the number listed on the cover page of this brochure.

Item 18 Financial Information

Under Rule 206(4)-4 of the Investment Advisers Act of 1940, investment advisers are required to disclose certain information about their business practices that might serve as material to the client's decision in choosing an investment adviser.

Curbstone does not require the pre-payment of any fees six months or more in advance of services or maintain any financial hardships or other conditions that might impair its ability to meet its contractual obligation to clients.