



796 SW Bradbury Way, Suite 101  
Bend, OR 97702  
(541) 707-2260  
[www.2260west.com](http://www.2260west.com)

March 29, 2024

### **Form ADV, Part 2A – Disclosure Brochure**

This brochure provides information about the qualifications and business practices of 2260 West, LLC. If you have any questions about the contents of this brochure, please contact us at (352) 359-1173. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

2260 West, LLC is a registered investment advisor. Registration of an investment advisor does not imply any level of skill or training.

## **Item 2 – Material Changes**

The brochure dated September 2023 is the revised brochure of 2260 West, LLC.

2260 West, LLC will provide updated disclosures and brochures as material changes present themselves. We will provide a brochure at your request by contacting us at (352) 359-1173.

Kyle Dover is now the firm's chief compliance officer. (Item 19)

2260 West now offers portfolio management services (Items 4 & 5)

### **Item 3 – Table of Contents**

|  |    |
|--|----|
| Item 1 – Cover Page.....   | 1  |
| Item 2 – Material Changes.....   | 2  |
| Item 3 – Table of Contents.....  | 3  |
| Item 4 – Advisory Business.....  | 4  |
| Item 5 – Fees and Compensation.....                                      | 6  |
| Item 6 – Performance-Based Fees and Side-By-Side Management.....         | 7  |
| Item 7 – Types of Clients.....   | 7  |
| Item 8 – Methods of Analysis, Investment Strategies, and Risk of Loss... | 7  |
| Item 9 – Disciplinary Information.....                                   | 8  |
| Item 10 – Other Financial Industry Activities and Affiliations.....      | 9  |
| Item 11 – Code of Ethics.....  | 9  |
| Item 12 – Brokerage Practices.....                                       | 9  |
| Item 13 – Review of Accounts.....  | 10 |
| Item 14 – Client Referrals and Other Compensation.....                   | 10 |
| Item 15 – Custody.....   | 10 |
| Item 16 – Investment Discretion.....                                     | 10 |
| Item 17 – Voting Client Securities.....                                  | 10 |
| Item 18 – Financial Information.....                                     | 11 |
| Item 19 – Requirements for State-Registered Advisors.....                | 11 |

## **Item 4 – Advisory Business**

### **A - Firm description**

2260 West, LLC (2260 West) is an investment advisory firm, registered in the State of Oregon, formed in June 2020. 2260 West provides financial planning services to individuals and small businesses in the State of Oregon. The principal owners are Kyle Dover and Cody Martin.

### **B - Advisory services offered**

2260 West offers financial planning services to individuals, families, trusts, estates, and small businesses (“client”) and portfolio management services.

### **Portfolio Management Services**

2260 West offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. 2260 West creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels) Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

2260 West evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

2260 West seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of 2260 West’s economic, investment or other financial interests. To meet its fiduciary obligations, 2260 West attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and, accordingly, 2260 West’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is 2260 West’s policy to allocate investment opportunities and transactions

it identifies as being appropriate and prudent that might have a limited supply among its clients on a fair and equitable basis over time.

### ***Personal financial planning***

2260 West provides various financial planning services to individuals and families in accordance with a written financial planning agreement. These services are tailored to each client's financial goals and objectives.

Personal financial planning involves the following seven-step process to create and maintain a client's financial plan.

1. Discovery and understanding of client's personal and financial circumstances
2. Identifying and selecting goals
3. Analyzing the client's current course of action and potential alternative courses of action
4. Developing the financial planning recommendations
5. Presenting the financial planning recommendations
6. Implementing the financial planning recommendations
7. Monitoring progress and updating

During the financial planning process, certain recommendations may be presented to the client. 2260 West will work with each client's professional team or provide referrals to professionals (accountants, attorneys, investment advisors, insurance brokers, etc.) to assist clients in implementing plan recommendations.

On an as-needed basis, 2260 West provides consulting related to various a la carte financial planning issues.

The personal financial planning areas of focus for 2260 West include, but are not limited to, the following:

1. Budget planning
2. Retirement planning
3. Estate planning
4. Education planning
5. Insurance planning
6. Cash flow planning
7. Custom planning
8. Tax planning
9. Goal-based planning

### ***Business financial planning***

2260 West provides various financial planning services to businesses and their owners, members, and/or shareholders ("client") in accordance with a written financial planning agreement. These services are tailored to each client's financial goals and objectives.

The same seven-step process used for personal financial planning is utilized for business financial planning.

The business financial planning areas of focus of 2260 West include, but are not limited to, the following:

1. Acquisitions
2. Start-up assistance
3. Financial coaching
4. Budget planning
5. Business sales
6. Succession planning

**C – Tailored advisory services**

The services provided by 2260 West are tailored to the goals and objectives of each client. Although 2260 West follows a stringent internal process in providing advisory services, each client's needs, goals and objectives are distinct.

**D – Participation in wrap fee programs**

2260 West does not participate in wrap fee programs.

**E – Management of client assets**

2260 West does manage client assets on a discretionary or non-discretionary basis.

## Item 5 – Fees and Compensation

The following paragraphs describe the fee structure for services rendered by 2260 West. Prior to engaging 2260 West for advisory services, each client will be provided and asked to sign a written agreement stating the terms of the engagement and fee structure.

### A – Compensation for advisory services

2260 West is a fee-only advisory firm. Compensation is only provided by clients and 2260 West does not receive any compensation from any other third-party.

### Portfolio Management Services Fees

| Total Assets              | Annual Fee |
|---------------------------|------------|
| \$0 - \$300,000           | 1.50%      |
| \$300,001 - \$1,000,000   | 1.25%      |
| \$1,000,001 - \$3,000,000 | 0.80%      |
| \$3,000,001 +             | 0.50%      |

Portfolio management fees are withdrawn directly from the client's accounts with client's written authorization or may be invoiced and billed directly to the client; clients may select the method in which they are billed. Fees are paid quarterly in advance.

### ***Personal financial planning***

A fee for an initial financial plan will be agreed upon, in writing, prior to the commencement of the planning activities. This fee is dependent upon the nature and complexity of the financial plan. Our minimum fee for an initial financial plan is \$1,000.

Additional fees to monitor the financial plan, alter the financial plan or discuss the financial plan after it has been delivered will be charged at standard hourly rates of \$350/hour.

### ***Business financial planning***

A fee for an initial financial plan will be agreed upon, in writing, prior to the commencement of the planning activities. This fee is dependent upon the nature and complexity of the financial plan. 2260 West will track the time involved in the plan and communicate certain departures from the agreed upon initial planning fee, periodically.

Additional fees to monitor the financial plan, alter the financial plan or discuss the financial plan after it has been delivered will be charged at standard hourly rates of \$350/hour.

### **B – Nature of client bills**

Portfolio management fees are withdrawn directly from the client's accounts with client's written authorization in arrears. Fees are paid quarterly.

2260 West will bill clients for fees as time is incurred on the engagement. 2260 West reserves the right to charge interest on unpaid balances 30 days past due.

### **C – Other fees or expenses**

Additional fees may be charged for costs incurred by 2260 West on behalf of the client. Examples include, but are not limited to, standard mileage rates and postage.

### **D – Fees paid in advance**

Occasionally, 2260 West will require a "retainer" (fees paid in advance of the engagement). If a client requests to terminate an engagement, 2260 West reserves the right to utilize the retainer for time incurred in an engagement based on standard hourly rates. Any excess retainer will be refunded to the client.

### **E – Compensation for sales of securities or other investment products**

2260 West is a fee-only advisory firm and will not accept or receive fees, commissions or any other form of compensation from third parties. Doing so may create conflicts of interest and incentivize supervised persons ("advisors") to recommend certain products.

To the fullest extent possible, 2260 West will work with the client's professional team (accountant, attorney, investment advisor, insurance agent, etc.). Occasionally, clients will require referrals to professionals to assist with plan recommendations. 2260 West will assist clients in locating independent professionals as part of the financial planning process.

### **Item 6 – Performance-Based Fees and Side-By-Side Management**

2260 West does not charge any performance-based fees for services provided. This item is not applicable.



## Item 7 – Types of Clients

2260 West provides investment advice to individuals, families, trusts, estates and businesses. 2260 West does not require minimum assets under management to provide investment advice.

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

### A. Methods of Analysis and Investment Strategies

#### ***Methods of Analysis***

2260 West's methods of analysis include charting analysis, fundamental analysis, technical analysis, cyclical analysis, quantitative analysis and modern portfolio theory.

**Charting analysis** involves the use of patterns in performance charts. 2260 West uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Technical analysis** involves the analysis of past market data; primarily price and volume.

**Cyclical analysis** involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

**Quantitative analysis** deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

**Modern portfolio theory** is an investment approach that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently

minimize risk for a given level of expected return, by carefully choosing the proportions of various assets.

### ***Investment Strategies***

2260 West uses long term trading and short term trading.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## B. Material Risks Involved

### ***Methods of Analysis***

**Charting analysis** strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Technical analysis** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

**Cyclical analysis** assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles these investors are trying to exploit.

**Quantitative analysis.** Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

**Modern Portfolio Theory** assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

## **Investment Strategies**

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Short term trading** risks include liquidity, economic stability and inflation, in addition to the long term trading risks listed above. Frequent trading, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### C. Risks of Specific Securities Utilized

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry market conditions and general economic environments.

**Fixed Income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This includes corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general the fixed income market is volatile, and fixed income securities carry significant interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also

carry inflation risk, liquidity risk, call risk and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting, but these bonds still carry a risk of losing share price value. Risks of investing in foreign fixed income securities also include the general risks inherent in non-U.S. investing.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond (fixed income) nature or stock (equity) nature, or a mix of multiple underlying security types.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Because ETFs use "authorized participants" (APs) as agents to facilitate creations or redemptions (primary market), there is a risk that an AP decides to no longer participate for a particular ETF; however, that risk is mitigated by the fact that other APs can step in to fill the vacancy of the withdrawing AP [an ETF typically has multiple APs] and ETF transactions predominantly take place in the secondary market without need for an AP. Like other liquid securities, ETF pricing changes throughout the trading day and there can be no guarantee that an ETF is purchased at the optimal time in terms of market movements. Moreover, due to market fluctuations, ETF brokerage costs, differing demand and characteristics of underlying securities, and other factors, the price of an ETF can be lower than the aggregate market price of its cash and component individual securities (net asset value – NAV). An ETF is subject to the same market risks as those of its underlying individual securities, and also has internal expenses that can lower investment returns.

**Inflation Risk**, also known as **Purchasing Power Risk**, arises from the decline in value of securities cash flow due to inflation, which is measured in terms of purchasing power. Inflation Protection Bonds such as TIPS are the only protection offered against this risk. Floaters, the resetting of the interest rates, can help reduce inflation risk. All other bonds have fixed interest rates for the life of the bond, which exposes the investor to this risk.

**Interest Rate Risk** is the risk that an investment's value will change due to a change in the absolute level of interest rates, spread between two rates, shape of the yield curve, or in any other interest rate relationship. These changes can be reduced by diversifying or hedging, since the changes usually affect securities inversely.

**Economic Risk** is the chance that macroeconomic conditions like exchange rates, government regulation, or political stability will affect an investment, usually one in a foreign country.

**Market Risk**, also called systematic risk, is the possibility of an investor experiencing losses due to factors that affect the overall performance of the financial markets in which they are involved. This type of risk can be hedged against, but cannot be eliminated through diversification. Sources of market risk include recessions, political turmoil, changes in interest rates, natural disasters and terrorist attacks.

**Political Risk**, also known as geopolitical risk, is risk an investment's returns could suffer as a result of political changes or instability in a country. This becomes more of a factor as the time horizon of an investment gets longer. Instability affecting investment returns could stem from a change in government, legislative bodies, other foreign policy makers or military control.

**Regulatory Risk** is the risk that a change in laws and/or regulations will materially impact a security, business, sector or market. These changes can increase the costs of operating a business, reduce the attractiveness of an investment, or change the competitive landscape, and are made by either the government or a regulatory body.

**Liquidity Risk** stems from the lack of marketability of an investment that cannot be bought or sold quickly enough to prevent or minimize a loss. It is typically reflected in unusually wide bid-ask spreads or large price movements. Typically, the smaller the size of the security or its issuer, the larger the liquidity risk.

**Credit Risk** traditionally refers to the risk that a lender may not receive the owed principal and interest, which results in an interruption of cash flows and increased costs for collection. Credit risk is the probable risk of loss resulting from a borrower's failure to repay a loan or meet contractual obligations. While impossible to know exactly who will default on obligations, with proper assessment and credit risk management, the severity of loss can be lessened. A lender's or investor's reward for assuming credit risk include the interest payments from the borrower or issuer of a debt obligation.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **Item 9 – Disciplinary Information**

There have been and are currently no legal or disciplinary events that would be material to the evaluation of 2260 West or the integrity of the firm's management.

## **Item 10 – Other Financial Industry Activities and Affiliations**

Neither 2260 West nor related persons are registered, or have applications pending to register, as a broker-dealer, a registered representative of a broker-dealer, a futures commission merchant, a commodity pool operator, or a commodity trading advisor, or an associated persona of the foregoing entities.

2260 West is engaged in the business of financial planning and wealth management. The principal owners of 2260 West are Kyle Dover and Cody Martin. Both individuals are certified public accountants (CPAs) and are also principal owners of Patrick Casey & Co. LLP, an accounting firm in Bend, Oregon. Most of their professional time is spent on activities of Patrick Casey & Co. LLP. Certain clients of 2260 West are also clients of Patrick Casey & Co. LLP.

2260 West acts entirely independent of Patrick Casey & Co. LLP. As part of the financial planning process, 2260 West will occasionally be required to refer clients to accounting firms, which may include Patrick Casey & Co. LLP. Such referrals will be disclosed to the client.

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

2260 West has a Code of Ethics (the “Code”) that our firm and employees adhere to as our fiduciary commitment to each client. This Code applies to all principal owners, supervised persons and related persons associated with 2260 West. Through honesty, integrity, competence, and diligence, 2260 West acts in our client’s best interest and exercises due care. This includes avoiding, disclosing and managing conflicts of interest and maintaining the confidentiality and privacy of our clients.

2260 West adheres to the CFP Board’s Code of Ethics. Upon request, we can direct you to a weblink to the Code.

2260 West does not recommend that clients buy or sell any security in which 2260 West or a related person has a material financial interest.

From time to time, representatives of 2260 West may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of 2260 West to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. 2260 West will always document any transactions that could be construed as

conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

## **Item 12 – Brokerage Practices**

Custodians/broker-dealers will be recommended based on 2260 West's duty to seek "best execution," which is the obligation to seek to execute securities transactions for a client on terms that are the most favorable to the client under the circumstances. The client will not necessarily pay the lowest commission or commission equivalent, and 2260 West may also consider the market expertise and research access provided by the payment of commissions, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers to aid in the research efforts of 2260 West. 2260 West will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

2260 West recommends the custodian Fidelity Brokerage Services LLC (CRD# 7784),

### **1. *Research and Other Soft Dollar Benefits***

2260 West has access to research, products, or other services from its broker/dealer in connection with client securities transactions ("soft dollar benefits") consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended, and may consider these benefits in recommending brokers. There can be no assurance that any particular client will benefit from any particular soft dollar research or other benefits. 2260 West benefits by not having to produce or pay for the research, products or services, and 2260 West will have an incentive to recommend a broker dealer based on receiving research or services. Clients should be aware that 2260 West's acceptance of soft dollar benefits may result in higher commissions charged to the client.

### **2. *Brokerage for Client Referrals***

2260 West receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### **3. *Clients Directing Which Broker/Dealer/Custodian to Use***

2260 West will require clients to use a specific broker-dealer to execute transactions.

Aggregating (Block) Trading for Multiple Client Accounts

If 2260 West buys or sells the same securities on behalf of more than one client, it might, but would be under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple clients in order to seek more favorable prices, lower brokerage commissions or more efficient execution. In such case, 2260 West would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. 2260 West would determine the appropriate number of shares to place with brokers and will select the appropriate brokers consistent with 2260 West's duty to seek best execution, except for those accounts with specific brokerage direction (if any). When 2260 West does not or cannot aggregate trades, clients may receive less favorable prices, pay higher brokerage commissions, or experience less efficient trade execution.

### **Item 13 – Review of Accounts**

Through our rigorous internal process, 2260 West continually reviews client financial plans. As part of the monitoring step in the financial planning process, this occurs no less than once annually. Additionally, all principal owners and supervised persons are included in the review process. The review process is a collaborative internal process of our firm aimed to identify planning opportunities, solutions, recommendations and alternatives for our clients. The commentary divulged in our process is documented internally.

### **Item 14 – Client Referrals and Other Compensation**

2260 West does not participate in any written or oral client referral fee programs, or other compensation programs. The only compensation provided to 2260 West is by fees charged to clients.

### **Item 15 – Custody**

When 2260 West deducts fees directly from client accounts at a selected custodian, 2260 West will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.



## **Item 16 – Investment Discretion**

2260 West provides discretionary investment advisory services to clients. The Investment Advisory Contract established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, 2260 West 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.

## **Item 17 – Voting Client Securities**

2260 West has not, does not, and will not, accept authority to vote client securities. Clients will receive their proxies or other solicitations directly from their custodians or transfer agents.

## **Item 18 – Financial Information**

2260 West does not require advance payment of fees more than five months in advance for services provided.

2260 West does have discretionary authority but does not hold custody of client funds, securities or assets of any nature.

2260 West has not been the subject of a bankruptcy petition at any time during the past ten years.

## **Item 19 – Requirements for State-Registered Advisors**

### **A – Management persons**

Kyle Dover is the manager and chief compliance officer of 2260 West. Information regarding his formal education and background is available in Form ADV, Part 2B – Brochure Supplement (see below).

Cody Martin is a manager of 2260 West. Information regarding his formal education and background is available in Form ADV, Part 2B – Brochure Supplement (see below).

### **B – Other businesses**

The principal owners of 2260 West are Kyle Dover and Cody Martin. Both individuals are certified public accountants (CPAs) and are also principal owners of Patrick Casey & Co. LLP, an accounting firm in Bend, Oregon. Most of their professional time is spent on activities of Patrick Casey & Co. LLP. Certain clients of 2260 West are also clients of Patrick Casey & Co. LLP.

### **C – Performance-based fees**

2260 West is not compensated with any performance-based fees. Additionally, 2260 West does not compensate any supervised persons with performance-based fees.

### **D – Management person legal events**

Neither of the management persons of 2260 West have been found liable in (a) an arbitration claims alleging damages in excess of \$2,500 or (b) a civil, self-regulatory organization, or administrative proceeding involving any of the following:

1. An investment or an investment-related business or activity;
2. Fraud, false statement(s), or omissions;
3. Theft, embezzlement, or other wrongful taking of property;
4. Bribery, forgery, counterfeiting, or extortion; or
5. Dishonest, unfair, or unethical practices.

### **E – Relationships with securities issuers**

2260 West and its management persons do not have any relationships with issuers of securities.