Form ADV Part 2A: Firm *Brochure*

Item 1 – Cover Page

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Form ADV Part 2A: *Firm Brochure*
March 30, 2026

This brochure provides information about the qualifications and business practices of David Vaughan Investments, LLC ("DVI" or "the Firm"). Questions about the contents of this brochure may be answered by contacting DVI at the telephone number and/or email address listed above. 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.

Additional information about DVI is available on the SEC's website at www.adviserinfo.sec.gov. This site can be searched by using a unique identifying number, known as a CRD number. DVI's unique CRD numberof 105990.

DVI is registered with the SEC as an investment adviser. Registration does not imply a certain level of skill or training.

Item 2 - Material Changes

This *Item 2* discloses material changes in this Form ADV Part 2A (the "Brochure"). Since the last Annual Update of this Brochure was submitted on October 1, 2025, the following material changes were made to this document.

Pledged Asset Credit Solutions - added a new disclosure regarding Pledged Asset Credit Solutions that are used on occasion by certain clients. Please refer to *Item 4 Advisory Business* for more information.

Alternative Investment Pricing - added new disclosure language regarding the process by which Alternative Investment securities are priced and valued. Please refer to *Item 5 Fees and Compensation* for more information.

Market Value and Pricing of Securities - added a new disclosure regarding the process by which DVI acquires pricing for Client securities and how the Firm resolves discrepancies in such pricing. Please refer to *Item 5 Fees and Compensation* for more information.

Use of Artificial Intelligence ("AI") - added additional language regarding how DVI mitigates the risks associated with its use of Artificial Intelligence tools in its operations. Please refer to *Item 8 Methods of Analysis, Investment Strategies and Risk of Loss* for more information.

Other Conflicts of Interest - added a new disclosure regarding potential conflicts of interest when DVI Associates serve as a trustee or authorized agent on Client accounts or serve on the Board of Directors of other organizations or charities. Please refer to *Item 11 Code of Ethics, Participation or Interest in Client Transactions & Personal Trading* for more information.

Additional Custodians and/or Broker/Dealers - added new disclosure language regarding DVI's right to add other custodians or broker/dealers to their recommended list, based upon business needs and industry opportunities. It further discloses the evaluation criteria used in selecting another firm to serve in such a role. Please refer to *Item 12 Brokerage Practices* for more information.

Conflicts of Interest with Third-Party Vendors - added a new disclosure regarding potential conflicts of interest that could arise when a third-party vendor, including custodians or broker/dealers, provides gifts or entertainment to DVI Associates. It further discloses that such conflicts are mitigated by DVI's Code of Ethics. Please refer to *Item 12 Brokerage Practices* for more information.

Use of Solicitors or Promoters - added new disclosure language that better describes DVI's use of a Promotor relationship and explains that the Firm may pay such Promoter referral fees in accordance with the SEC's Marketing Rule (Rule 206(4)-1 of the Investment Advisers Act of 1940.) It further discloses that the payment of such referral fees shall not result in additional fees to the client. Please refer to *Item 14 Client Referrals and Other Compensation* for more information.

In addition, several minor editorial revisions were made to improve the clarity and readability of the Brochure.

Copies of this Brochure may be requested by contacting David Vaughan Investments, LLC at 309.685.0033. This Brochure is also available on the DVI website at www.dviinc.com.

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Item 4 Advisory Business

Overview of the Firm

DVI is a registered investment advisor, privately owned since its initial registration with the SEC in 1977, with its headquarters in Peoria, Illinois and a second office in Winter Park, Florida. DVI is organized as a Delaware limited liability company, of which Hometown Community Bancorp, Inc. ("HCB") is the majority unit owner. HCB (an ESOP company) is a privately held community bank located in Central Illinois; DVI is an operating subsidiary of HCB.

The DVI team provides investment management services, building custom portfolios that are based on each Client's unique set of income and growth objectives, risk tolerance levels and tax considerations. Client restrictions are discussed in *Item 16 Investment Discretion*. While separately managed accounts are DVI's core competence, the Firm also provides a variety of ancillary wealth management and financial planning services and works with Clients' other advisers to solve complex tax, legal and financial challenges.

The Executive Officers of DVI are as follows:

Lawrence Williams, IV	Chairman, President & CEO
Brian A. Christensen	Senior Vice President & Chief Investment Officer *(CFA)*
Patrick J. Smarjesse	Senior Vice President, Relationship Management *(CEBS)*
Todd M. Sheridan	Vice President *(CFA)*
Stephen K. Hinrichs	Senior Vice President, Investment Strategy *(CFA)*
Michael A. Price	Chief Compliance Officer & Vice President, Risk Management & Corporate Secretary
Elizabeth W. Salmon	Vice President, Operations *(CPA)*
Jeffrey J. Huizenga	Director, Wealth Strategies *(CFP®, ChFC®, MSFS®)*
Stephanie A. Ricketts	Managing Director, Relationship Management & Client Services *(CFP®)*
Alfredo A. Risi	Chief Operating Officer
Glenn J. Maxey	Director & Senior Portfolio Manager *(CFA)*
Mitchell A. Zippay	Director & Senior Accounting Manager *(CPA)*
Erin L. Duvall	Chief People Officer

The Board of Managers of DVI are as follows:

Lawrence Williams, IV (Chairman)
Darrin A. Autry
Brian A. Christensen
Michael L. DeWalt
Andrew A. Honegger
John V.N. McClure
Kevin D. Schoeplein
Christopher C. Spears
David J. Vaughan, Jr.

The Firm manages $5,329,836,830 in discretionary assets and $1,545,993 of non-discretionary assets as of December 31, 2025. These values do not include any assets under advisement.

Discretionary Asset Management Services

DVI provides investment advisory services to high-net worth individuals, trusts, estates, charitable organizations, public & private foundations, qualified retirement plans, corporations, and other business entities.

Equity Portfolio Management

DVI's primary focus is the management of value-oriented, income-producing common stock portfolios. DVI utilizes a disciplined investment process that focuses on the development of fundamentally sound, diversified equity portfolios with the highest priority placed upon risk management and the preservation of invested capital. For portfolios without the scale to use individual securities, DVI may invest assets into a portfolio of Exchange Traded Funds ("ETFs") that invest in equities.

Balanced Portfolio Management

DVI provides a Balanced Portfolio Strategy using individual stocks and fixed-income instruments within the overall framework of an asset allocation target. Within this strategy, money market fund assets and cash equivalents are considered Equity Strategy assets for fee calculation purposes. For portfolios without the scale to use individual securities, DVI may invest assets into a portfolio of ETFs that invest in equities and fixed income securities.

Fixed Income Portfolio Management

DVI also provides fixed income management using both taxable and tax-exempt securities for those Clients who desire an allocation to this asset class for the purpose of risk reduction or current income enhancement.

Mutual Fund - Asset Allocation Portfolio Management

DVI has developed proprietary models for both fund selection as well as the development of asset allocation portfolios comprised of mutual funds, targeted primarily toward smaller Client accounts.

Wealth Management Advisory Services

In addition to the Discretionary Asset Management Services detailed above, the Firm offers additional ancillary services to solve the complex challenges faced by high-net-worth individual Clients. DVI works in partnership with Clients' other advisers on matters such as:

- Trust and estate planning & settlement
- Financial & retirement planning
- Tax-sensitive investment planning
- Distribution analysis
- Education funding & 529 college savings plans
- Individual trustee support services
- Stock option strategies
- Cash management
- Accommodation accounts
- Management of concentrated holdings
- Debt management
- Corporate employee benefits
- Philanthropic advisory services
  - Donor advised funds
  - Charitable trusts
  - Private foundation
- Generational wealth transfer strategies
  - Grantor retained annuity trusts
  - Defective grantor trusts
- Corporate trustee & fiduciary services
- Executive compensation strategies
- Private company advisory services

DVI often provides financial planning services, which is an evaluation of a Client's financial state using currently known variables to predict future cash flows and asset values. Through in-depth personal interviews, the Firm gathers information including the Client's current financial status, tax status, future goals, return objectives and attitudes towards risk. DVI then reviews these documents, conducts analyses and develops strategies intended to optimize Clients' future financial situations.

DVI also provides Clients with a quarterly newsletter "Quarterly Perspective" and "Capital Markets Commentary", which keeps Clients informed about DVI's views on the investment markets and other related topics. In addition, the Firm publishes an annual "Year in Review" and other assorted communications, all at no additional cost to Clients.

Investment Advisory Services to HCB affiliates

DVI serves as a sub-advisor for and maintains a contractual agreement with Morton Community Bank ("MCB"), an affiliate of HCB. The Firm has developed proprietary model portfolios that are targeted to these Sub-Advisory Client Engagements.

Consulting Services

DVI Consulting Group provides services targeted to the plan sponsors of participant and trustee-directed qualified retirement plans, Taft-Hartley plans, foundations and endowment funds of non-profit organizations. These assets are included in DVI's reported assets under advisement but not in discretionary assets under management.

Such services are designed to minimize the fiduciary liability of plan sponsors and include the development of investment policy statements, the selection and monitoring of investment options, the communication of investment options to plan participants, the investment education of plan participants and the performance measurement and evaluation of plan investment options.

Foundation & Endowment Services

Services related to Foundation and Endowments include: the development of investment policy statements & spending policies and the selection and monitoring of investment options and performance measurement & reporting. In addition, the Firm provides services related to the accounting of related financial activities, the processing of grant requests, and account aggregation.

For such Clients who want consultative advice, ancillary support services and discretionary investment management, the Firm offers Outsourced Chief Investment Officer ("OCIO") services, which is a customized integrated solution meeting the specific needs of larger Foundation and Endowment Clients.

Implementation of Recommendations

For most of the Firm's Client accounts, DVI has full investment discretion to buy and sell securities as the Firm deems appropriate. However, Clients may at times impose specific guidelines, requirements, restrictions or requests as it relates to the management of certain accounts. Such guidelines, requirements, restrictions or requests are initiated at the discretion of Clients, and DVI does its best to accommodate such formal requests.

DVI's financial planning obligation is to merely present financial planning recommendations to the Client; the Firm has no obligation or responsibility to implement them. DVI is not a law firm and does not draft documents so the Client must present the Firm's findings and recommendations to their attorney, engage such professionals to design the actual strategies used and draft the corresponding documentation necessary to implement any such strategies. The Client shall have the sole authority and obligation regarding the acceptance/rejection and implementation of any recommendation given by DVI. Also, DVI is not an accounting or tax advisory firm; therefore, the Client must retain firms of their choosing to implement any related

recommendations made by the Firm. If requested by the Client, DVI may recommend the services of other professionals for development and implementation of strategies within their particular area of expertise. The Client is under no obligation to engage the services of any such recommended professional and retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from DVI.

IRA Rollovers

When DVI provides investment advice to a Client or potential Client regarding their retirement plan account or individual retirement account, the Firm 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 manner in which DVI generates fees can create conflicts with Clients' interests, so the Firm operates under a special rule that requires acting in the best interest of Clients and not putting the Firm's interest ahead of theirs.

Under this special rule's provisions, DVI must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put the Firm's financial interests ahead of Clients' when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that the Firm gives advice that is in the Client's best interest;
- Charge no more than is reasonable for the Firm's services; and
- Give Clients or potential Clients basic information about conflicts of interest.

DVI benefits financially from the rollover of Client assets from an ERISA account to an account that the Firm manages or provides investment advice to, because the new assets increase both the Firm's assets under management and advisory fees. In contrast, the Firm may receive less or no compensation if such assets remain in the current plan or are rolled over to a different Company plan in which the Client may participate.

As it relates to the transfer of such retirement assets, DVI serves as a fiduciary under both the Employee Retirement Income Security Act ("ERISA") and the Internal Revenue Code. For any potential rollover of retirement assets, the Firm will adhere to the impartial conduct standards shown above and also provide a written fiduciary disclosure and recommendation for why such a transfer may or may not be in the Client's best interest. In no case is a Client obligated to rollover retirement assets to an account managed by DVI.

Class Action Reporting Services

DVI has engaged Chicago Clearing Corporation ("CCC") as a third-party administrator for assistance in handling securities litigation claims on behalf of DVI Clients, ensuring that the appropriate forms are filed on a timely basis and the subsequent settlement distributions are received from the settlement fund. For those Clients that select this service, DVI may share Client information such as name, tax ID, and account number with CCC as necessary to provide this service. If the Client chooses to utilize this service, CCC will deduct a 15% service charge for all settlements that are so eligible under SEC Rules. DVI does not earn any fees for this service.

Account Aggregation Services

DVI may also provide periodic comprehensive reporting services which can incorporate all of a Client's investment assets, including those that are not part of the assets managed by DVI ("Excluded Assets"). For such reporting services, the Client acknowledges and understands that with respect to the Excluded Assets, DVI's service is limited to reporting only and does not include investment management, review, monitoring, investment recommendations or advice. As such, the Client (and not DVI) shall be exclusively responsible for the investment performance of the Excluded Assets. In the event the Client desires DVI to provide investment management services with respect to the Excluded Assets, the Client may engage DVI to do so for a separate and additional fee pursuant to the terms and conditions of the Investment Advisory Agreement ("IAA") between DVI and the Client.

Pledged Asset Credit Solutions

Clients retain the right to pledge assets held in their accounts, subject to any restrictions imposed upon them by client's custodians, to secure access to credit arrangements. The financial institutions that provide the credit have the authority to (1) restrict the transfer of Client account assets, (2) liquidate all or part of the pledged securities to maintain required collateral levels, and (3) call the client loan and require re-payment. Clients should carefully review the loan agreement and supporting loan documents to understand the additional risk and restrictions that are inherent in such an arrangement.

When MCB is the secured lender in such arrangements, they are a related party to DVI and could economically benefit from the loan facility. In addition, certain DVI officers maintain share ownership in HCB, which is the sole owner of MCB. DVI has a duty to disclose this potential conflict of interest.

Item 5 Fees and Compensation

DVI is compensated for investment advice and asset management services, wealth management advisory services, consulting services and OCIO services based upon the value of assets under management that have accumulated in the accounts at the

end of each month or quarter. Generally, month-end asset values are collected as reasonably determined by DVI and the three-month average is used to calculate the fee, which is then billed in arrears following the end of each calendar quarter. Some Clients may instead choose to be billed on a monthly basis. Clients may choose to have their fees deducted from their account(s) or be billed directly. In addition, Clients may choose to prepay fees upon request. In the event a Client prepays their fees and then terminates DVI's services before the prepaid period expires, the Firm will refund the unearned portion of the fees paid. DVI requests a minimum annual relationship fee of $9,000 for Discretionary Asset Management Services engagements and Wealth Management Advisory Services engagements, $1,000 for Mutual Fund Asset Allocation Portfolio Management Services, and $1,500 for Consulting Services, but does not impose a minimum dollar value of assets for starting or maintaining a relationship. DVI, at its discretion, may at times accept smaller relationships for fees less than its stated minimum.

The standard fee schedules for each type of investment strategy (shown below) are based upon a tiered approach where fees are paid based upon the stated rate for a specific asset range. DVI does not utilize wrap fees in billing Client accounts.

Discretionary Asset Management Services Fees

For institutional Clients, the standard Discretionary Asset Management Services fee schedules for each type of investment strategy (shown below) are based upon a tiered approach where fees are paid based upon the stated rate for the identified asset range. These fee schedules are specific only to the execution of the stated investment strategy and do not include the ancillary services provided under DVI's Wealth Management Advisory Services as stated in *Item 4 Advisory Business*.

Equity Common Stock Management - Equity Assets are billed at the following rates:
- .90 of 1% on the first $1,000,000 of equity assets
- .75 of 1% on $1,000,001 to $5,000,000 of equity assets
- .70 of 1% on $5,000,001 to $15,000,000 of equity assets
- .60 of 1% on $15,000,001 to $25,000,000 of equity assets
- .50 of 1% on equity assets that exceed $25,000,000

Balanced Portfolio Management - Balanced Assets are billed at the following rates:
- .80 of 1% on the first $1,000,000 of balanced assets
- .70 of 1% on $1,000,001 to $5,000,000 of balanced assets
- .60 of 1% on $5,000,001 to $15,000,000 of balanced assets
- .50 of 1% on balanced assets that exceed $15,000,000

Fixed Income Portfolio Management - Fixed Income Assets are billed at the following rates:
- .35 of 1% on the first $2,500,000 of fixed income assets
- .25 of 1% on fixed income assets that exceed $2,500,000

Mutual Fund Asset Allocation Portfolio Management - Mutual Fund Assets are billed at the following rates:
- 1.00% on the first $250,000 of mutual fund assets
- .90 of 1% on $250,001 to $500,000 of mutual fund assets
- .80 of 1% on $500,001 to $750,000 of mutual fund assets
- .70 of 1% on $750,001 to $1,000,000 of mutual fund assets
- .60 of 1% on mutual fund assets that exceed $1,000,000

Certain assets under management (notably in the Mutual Fund Asset Allocation schedule outlined above) are invested in open-end investment funds. These funds generally charge a management fee to compensate the investment advisors of these funds. These fees vary in amounts and are outlined in each fund's mutual fund prospectus. DVI's fees as outlined above are in addition to these fund's management fees. DVI does not receive any portion of these fund management fees.

DVI's investment management fees are exclusive of brokerage commissions, transaction fees and other related costs and expenses which may be incurred by the Client. Custodians, broker/dealers, and other third parties charge transaction fees and/or commissions for the purchase and sale of stocks and mutual funds, wire transfer fees and various other transactions (See *Item 12 Brokerage*). DVI does not receive any portion of these transaction fees, commissions and/or costs.

Wealth Management Advisory Services Fees

For individual Clients, the Wealth Management Advisory Services fee schedule is based upon a tiered approach where fees are paid based upon the stated rate for the identified asset range. This fee schedule incorporates both the investment of assets per the Client's stated investment strategy as well as the inclusion of DVI's ancillary Wealth Management Advisory Services as stated in *Item 4 Advisory Business*.

Wealth Management Advisory Services – Wealth Management Advisory Services Assets are billed at the following rates:
- .90 of 1% on the first $1,000,000 of Wealth Management Advisory Services assets
- .75 of 1% on $1,000,001 to $5,000,000 of Wealth Management Advisory Services assets
- .70 of 1% on $5,000,001 to $15,000,000 of Wealth Management Advisory Services assets
- .60 of 1% on $15,000,001 to $25,000,000 of Wealth Management Advisory Services assets
- .50 of 1% on Wealth Management Advisory Services assets that exceed $25,000,000

Financial Planning Services

If and when DVI provides financial planning services to its Wealth Management Advisory Services Clients, an additional fee will not be charged for such services unless the project is of an unusual scope and/or extraordinary nature. In such cases, the fee would be determined and communicated to the Client in writing prior to the start of the engagement.

If and when DVI provides financial planning services to a prospective Client on a stand-alone basis, the scope of the project will be evaluated and a fee for such service will be determined and outlined in the corresponding agreement for services. If the prospective Client becomes an actual Client, any fees from the initial financial plan may be credited to the payment of future investment management fees.

Sub-Advisory Services to MCB

The fee schedule for this engagement will vary on a case-by-case basis based upon several determining factors such as 1) investment strategy, 2) amount of assets under management, and 3) strategy execution and Client servicing requirements.

DVI Consulting Services

Asset Based Consulting Fee - Consulting Assets are billed at the following rates:

.50 of 1% on the first $2,500,000 of assets
.40 of 1% on $2,500,001 to $7,500,000 of assets
.30 of 1% on $7,500,001 to $15,000,000 of assets
.20 of 1% on assets that exceed $15,000,000

The Clients of DVI Consulting Group are potentially paying two layers of fees. The organization or plan sponsor pays DVI Consulting Group for the consulting services as described in *Item 4 Advisory Business*. In addition, the organization or plan account is subject to the internal management fees associated with any mutual funds that are selected by the Client.

OCIO Services

The fee schedule for these engagements will be determined on a case-by-case basis, driven by the customized nature of the menu of services provided by DVI and the amount of assets under management.

Alternative Investments

DVI will calculate fees for assets invested in Alternative Investments based upon the most recently reported market values, which are typically subject to delayed and non-standardized reporting periods and are provided to DVI directly from the fund companies. While DVI seeks to exercise reasonable care in determining such pricing, the process presents a potential conflict of interest as higher reported values may result in higher advisory fees charged to Clients.

Fees will be paid in arrears. In addition, Clients invested in such assets will incur additional charges imposed directly on such invested funds by the fund companies (e.g. management fees, performance fees and other fund expenses).

Advisory Fees on Margin Accounts

DVI does not recommend the use of margin for investment purposes and any such use is at the direction of Clients. When calculating advisory fees for an account in which there exists a margin loan, DVI uses the entire market value of the margined assets as the basis for the fee calculation.

Variances in Fee Schedules

DVI provides certain directors, shareholders, and employees of DVI and members of their families with advisory services at a discount to the regular fee schedules.

The foregoing fees will be subject to negotiation in individual cases. DVI's Clients could be subject to different fee schedules, including those that may be lower than those set forth in *Item 5 Fees and Compensation*. The fees applicable to each Client are detailed in the corresponding IAA set forth between DVI and the Client. Clients that fall under grandfathered fee schedules may reference such IAAs for more information on the fees applicable to their accounts.

Grandfathered Fee Schedules

DVI's Asset Management Fee and Wealth Management Advisory Services Fee schedules shall be amended from time to time. Some DVI Clients have been and will continue to be grandfathered under more favorable fee schedules that preceded the fee schedules provided in the most recent ADV filing. As a result, some DVI Clients will be subject to different investment advisory fee schedules than those set forth in *Item 5 Fees and Compensation*.

Annual fees applicable to a Client engagement are detailed in the Investment Advisory Agreement executed between DVI and the Client. Clients engaged under grandfathered fee schedules are advised to consult their most recently executed Investment Advisory Agreement, which will be provided by DVI upon request.

Limited Negotiability of Advisory Fees:

Although DVI has established standard schedules for DVI's Asset Management and Wealth Management Advisory Services, DVI retains the right to negotiate fees on a Client-by-Client basis. Fees may be negotiable for accounts of substantial size, execution efficiency or other unique Client specific factors.

Fee Payment Options

There are two options Clients may select to pay for provided services:

1. *Direct Debiting (preferred):* At the inception of the relationship and at each month-end, quarter-end, or annual period thereafter, DVI will notify Client custodians of the amount of the management fee due and payable to DVI per the fee schedule and IAA. If Clients choose this method, they must provide written authorization to the custodian permitting DVI's management fee to be paid directly from their account held by such custodian. The custodian does not validate or check DVI's fee or its calculation on the assets on which the fee is based. The custodian will deduct the fee from the Client's account(s) or, if they have more than one account, from the account(s) that have designated by the Client to pay such fees. Each month, Clients will receive a statement directly from their custodian showing all transactions, positions and credits/debits into or out of their account. These transactions should be checked by the Client for accuracy, including the amount of the management fee which has been deducted. The statements after the fees are billed will reflect these transactions.
2. *Pay-by-Check:* At the inception of the relationship and each month, quarter, or annually, as determined by the IAA, DVI will issue the Client an invoice for services provided. The Client will then pay DVI by check upon receipt of the invoice.

Market Value and Pricing of Securities

The vast majority of client assets are priced daily utilizing independent pricing services engaged by the Client's account custodian. At times, these market values may differ or even be unavailable. This is especially true for fixed income or alternative securities, but it can also occur with other types of securities, including equities.

Since the same security can be priced differently at different custodians, a standardized pricing hierarchy must be imposed on the portfolio accounting system to ensure accurate, consistent and transparent reporting across all Clients. The Firm's portfolio accounting system has a pricing hierarchy whereby custodians are ranked by priority. If a security is valued by multiple custodians, the ultimate price assigned to the security in the portfolio accounting system reflects the price used by the custodian with the highest ranking. This means that if two accounts hold the same security and have different custodians, DVI's portfolio accounting system will value the security based on the price used by the custodian that is higher up in the pricing hierarchy. The price will then be applied to all accounts that hold the security. Many Alternative Investments receive pricing which is typically subject to delayed and non-standardized reporting periods and is provided to DVI directly from the fund companies.

While DVI seeks to exercise reasonable care in determining the pricing of all securities, the process presents a potential conflict of interest as higher reported values may result in higher advisory fees charged to Clients. DVI encourages Clients to compare their DVI reports with their own custodian statements and contact us with questions they may have about any pricing differences.

Termination of Relationships

A relationship may be terminated at any time by DVI or a Client, upon 60 days written notice to the other party. Fees will be prorated to the date of termination.

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

Not applicable.

Item 7 Types of Clients

DVI serves individual and high-net worth individuals, trusts, estates, charitable organizations, public & private foundations, qualified plans, corporations, and other business entities. Minimum fees and account sizes are discussed in *Item 5 Fees and Compensation*.

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

Equity Strategy

The core DVI investment strategy involves managing Client assets in an equity strategy with a long-term focus. Key aspects of the DVI equity strategy include diversification across economic sectors, limiting individual security exposures, maintaining low turnover and a focus on attractively valued, dividend-paying companies. DVI may also use a selection of Exchange Traded Funds (ETFs) to produce a similar portfolio risk profile for smaller accounts where prudent diversification cannot be achieved using individual equities. Equity accounts are typically close to fully invested at all times unless Client restrictions require an additional

cash component. Market timing in and out of the equity market is not part of the DVI equity strategy.

DVI uses a combination of quantitative and qualitative research in determining which companies to include in equity portfolios. The quantitative component utilizes a software platform to access, manage, and analyze a financial database that includes fundamental data and history for thousands of U.S.-based companies. Using this database, DVI has developed a proprietary ranking system to analyze the attractiveness of companies based on a list of factors DVI has determined important in generating positive long-term investment results.

In addition to quantitative research, DVI's internal research team performs qualitative research to determine which companies will ultimately be included in Client equity portfolios. DVI analysts rely on numerous sources to perform such qualitative research, including but not limited to news articles, company SEC filings, management conference calls, and third-party research reports. Criteria that DVI analysts look for in possible equity investments include but are not limited to consistent and growing earnings, product leadership, perceived competitive advantages, strong management teams, and a history of returning capital to shareholders.

Fixed Income Strategy

To complement DVI's core equity strategy, the Firm takes a conservative buy-and-hold approach to fixed income management, purchasing only high quality, investment-grade securities. These securities consist of obligations of the United States Government and its Agencies, large domestic and international corporations and/or state and local municipalities. As a result, the fixed income component of Clients' portfolios generally carries an aggregate investment grade credit rating of A2 / A or higher.

In addition to credit quality, DVI further manages risk by controlling a portfolio's maturity profile. The Firm's portfolios typically target a maturity profile of two to seven years. Once the appropriate portfolio structure is determined, DVI's portfolio management team selects individual securities which they believe provide the best risk-adjusted return for our Clients. DVI may also use a selection of Exchange Traded Funds (ETFs) for smaller accounts to produce a similar fixed income exposure.

Balanced Strategy

Many of DVI's Clients have specific needs that require investments in both equity and fixed income securities. To meet these needs the Firm structures balanced portfolios, which blend DVI's value-oriented, dividend-focused equity strategy with its high quality, buy-and-hold fixed income approach. DVI may also use a selection of Exchange Traded Funds (ETFs) to produce a similar portfolio risk profile for smaller accounts where prudent diversification cannot be achieved using individual equities.

The Client's asset allocation is customized based on their risk tolerance, income needs and investment time horizon. DVI works with Clients to determine the appropriate mixture of stocks and bonds for their portfolios, and the Firm monitors and adjusts these balances as Client needs change.

DVI also uses an asset-liability matching process to further refine a Client's asset allocation. This process sets aside certain assets in fixed income investments to prefund any known short-to-intermediate-term cash flow liabilities such as taxes, college tuition expenses or large asset purchases. Such a strategy is designed to reduce the impact of short-term market volatility on the Client's wealth and allows the equity portion of their portfolio to remain invested for long-term growth.

Mutual Fund Asset Allocation

Certain Client situations may require DVI to utilize a mutual fund-based strategy for managing their assets. DVI utilizes software to access, manage, and analyze mutual fund data on over 25,000 mutual funds. The Firm has developed a proprietary system to sort and filter the mutual fund database to identify funds that best meet Client objectives. DVI will typically purchase no-load or load-waived mutual funds for such portfolios, meaning Clients will not be subject to sales charges from fund companies for the purchase or sale of these funds. DVI receives no compensation from mutual fund companies for placing Client assets in their funds.

Alternative Investments

DVI, from time to time, may provide large, financially sophisticated accredited investors with investment advice regarding Alternative Investments such as private equity, private credit, real estate and infrastructure funds. Alternative investments tend to be less correlated to traditional stocks and fixed income securities and are added to a Client's portfolio to further diversify the Client's portfolio and reduce overall portfolio risk.

DVI's role shall be limited to:

- The initial investment due diligence,
- Assistance with the completion of subscription and redemption documents,
- Ongoing due diligence and monitoring, and
- Time-weighted rate of return performance calculations

A Client's investment in Alternative Investments shall be conditioned upon:

- An assessment of the Client's overall suitability and the Client's ability to bear the financial risk and illiquidity of the investment,
- A presentation by a DVI investment professional that educates the Client on the unique characteristics of Alternative

Investments, and
- The Client's approval in writing as documented in the Client's Investment Advisory Agreement

Use of Artificial Intelligence ("AI")

Artificial Intelligence ("AI") is used as an umbrella term that encompasses a broad spectrum of different technologies and applications. DVI defines AI as computer systems able to perform tasks that normally require human intelligence, such as research, visual perception, speech recognition, decision-making, and translation between languages, more commonly known as generative AI. The Firm utilizes AI for transcription, planning, documentation and basic research purposes, all while adhering to the guidelines outlined in the DVI AI Policy. The Firm does not use AI to directly create investment strategies or wealth management advice.

When relying on AI there are certain risks involved, including but not limited to data quality, copyright violations, confidentiality breaches and privacy law violations. In order to mitigate such risks, the Firm's AI policy provides internal guidance on its use, including prohibitions against using specific private individual or company information in external AI systems. The AI policy also requires verification of the accuracy of generated information before it can be used.

Risk of Loss

All DVI Investment Strategies involve risk of loss that Clients should be prepared to bear. Risks inherent in DVI's Investment Strategy include, but are not limited to:

Equity Investments
- Market Risk: The risk that the stock market in general declines. As a result, stocks owned may not be able to be sold at the price initially paid for them.
- Economic Risk: The risk that the economy will suffer a downturn as a whole. Such an event generally negatively impacts equity markets.
- Industry Risk: The risk that a specific industry will suffer a downturn, negatively impacting stocks in that industry.
- Company Specific Risk: The risk that earnings of a specific company will decline due to competitive pressures, management changes, or fraudulent activities within the company, to name a few.
- Geopolitical Risk: The risk that a country's government will suddenly change its policies. Events such as wars, terrorist events, government regulation, and tax policy changes can negatively impact the equity markets.

Fixed Income Investments
- Interest Rate Risk: The risk that market interest rates move higher, making the value of current bond holdings move lower.
- Credit Deterioration Risk: The risk that investors and/or credit rating agencies may take a more negative view of a bond issuer's ability to repay its obligations. If investors demand a higher rate of return from an issuer's bonds due to a perceived increase in risk, the value of that issuer's existing bonds will likely decline.
- Default Risk: The risk that the issuer of a bond may not live up to its financial obligations. A default by the issuer could mean that an investor loses their invested capital and the expected interest payments.
- Inflation Risk: The risk that the value of a long-term investment may not grow enough to keep up with inflation, reducing an investor's purchasing power as a result.
- Reinvestment Risk: The risk that interest rates have fallen when a bond matures. If this occurs, an investor may be unable to reinvest matured assets at the rate of return they were accustomed to receiving.
- Liquidity Risk: The risk that an investor will be unable to liquidate a bond when desired at current fair value. As a result, an investor may be forced to retain the asset or accept less than fair value.
- Taxation Risk: The risk that tax exempt securities have a change in their tax-exempt status or the impact of the adoption of lower federal tax rates.

Alternative Investments

The performance of Alternative Investments can be volatile and as such a Client could lose all or a portion of their investment. Such investments often have concentrated positions, make use of leverage, and in general maintain investments that may carry higher risk. In addition, Alternative Investments may have limited liquidity. The Alternative Investment's offering documents shall contain a detailed description of risk factors that must be reviewed by any potential investor.

Item 9 Disciplinary Information

The Firm has no material legal or disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

On September 29, 2017, Hometown Community Bancorp ("HCB"), a privately held community bank located in Central Illinois, acquired a majority interest in DVI. As a result, DVI is an operating subsidiary of HCB. Morton Community Bank ("MCB") is a wholly-owned direct subsidiary of HCB; MCB Trust & Wealth Management ("MCB Trust"), a trust company, is a division of MCB.

DVI's President & CEO serves as an officer of HCB and is a member of the MCB Board of Directors. DVI's Vice President, Operations also serves as a member of the MCB Board of Directors.

MCB and MCB Trust provide traditional community banking, investment and trust services throughout Central Illinois. DVI has entered into a Solicitor (or "Promoter" as defined in the SEC Marketing Rule) Agreement with MCB as described in *Item 14 Client Referrals and Other Compensation*. In addition, DVI has entered into an Investment Sub-Advisory Agreement with MCB to provide discretionary investment advisory services for investment management and trust assets for which MCB serves as Trustee or as investment manager. These services are substantially similar to the services provided to other DVI Clients. Furthermore, the personnel currently involved in the management of said assets are employees of DVI.

Thomas & Zurcher, P.A. (TZ) is a Florida based certified public accounting firm that provides tax advice and consulting services to DVI. TZ also provides accounting and tax preparation services to a multitude of DVI Clients located in Central Florida. DVI has engaged TZ to provide certain financial planning and retirement planning services to mutual Clients for which DVI compensates TZ. However, there is no ownership affiliation, common officers or employees between DVI and TZ.

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

DVI has adopted a Code of Ethics pursuant to SEC Rule 204(A)-1. As a result, there are minimum ethical standards that are required of all employees. DVI employees must:

1. Comply with all applicable federal and state securities laws;
2. Place the interests of Clients first;
3. Conduct all personal securities transactions in accordance with the Code of Ethics;
4. Ensure that investment adviser personnel should not take inappropriate advantage of their positions;
5. Adhere to the fiduciary principle that information concerning the identity of Clients and the security holdings and financial circumstances of such Clients is confidential;
6. Adhere to the principle that independence in the investment decision-making process is paramount; and
7. Adhere to the principle that the public and all Clients, prospects, employers and employees will be treated with integrity, competence, dignity, and in an ethical manner.

In addition to the above, the Code of Ethics sets forth the policy and procedures for other topics including, but not limited to, Access Persons' reporting requirements, insider (non-public) information, gifts, and sanctions for violations of the Code. Most DVI employees are considered to be Access Persons.

Participation or Interest in Client Transactions

DVI's employees can engage in personal securities transactions under circumstances specified in the Policy. There may be circumstances where DVI may buy and sell, on behalf of its Clients, securities of issuers or other investments in which DVI employees (including their related persons and/or members of their families) own securities or otherwise have a beneficial interest. In addition, DVI employees may buy or sell on their behalf at (or about) the same time such securities or other investments are bought or sold on behalf of Clients. This presents a potential conflict of interest in that an employee could front run Client trades to their personal benefit. This risk is mitigated by requiring DVI employees to pre-clear all transactions in securities not otherwise deemed to be exempt.

In addition, DVI's affiliate MCB may engage in transactions for their own Clients. Also, MCB's employees (including their related persons and/or members of their families) can engage in personal securities transactions, subject to their own policies. There may be circumstances where DVI may buy and sell, on behalf of its Clients, securities or other investments in which MCB or its employees own securities or otherwise have a beneficial interest, and/or in which any such persons may buy or sell on their behalf at, or about, the same time such securities are bought or sold on behalf of DVI's Clients. This presents a potential conflict of interest in that MCB and its employees may make different investment decisions that conflict with advice given by DVI to its Clients or may be on opposite sides of marketplace transactions. This conflict is managed by maintaining a separation between the affiliate relationship and specific investment decisions.

A copy of the Code of Ethics can be obtained by contacting the Chief Compliance Officer using the contact information on the cover page of this brochure.

Additional Potential Conflicts

DVI employees can, under certain circumstances and with approval, serve as directors or officers of outside organizations (including private/public companies, partnerships, charitable foundations or other not-for-profit organizations) or as trustees or authorized agents for trusts, foundations or such accounts. DVI may have a business relationship with these outside organizations and/or may seek additional relationships in the future. In those circumstances, the employee must not be involved in the decision to retain or hire DVI. Associates are required to disclose and update these circumstances quarterly.

In general, any action taken, or advice offered, by a DVI employee that results in a Client bringing additional discretionary assets to DVI to be managed could be viewed as a conflict of interest, since such assets will most likely increase the fees being paid by that Client.

Item 12 Brokerage Practices

Custodian & Broker/Dealer Selection

DVI is not a broker/dealer, nor does it have a broker/dealer affiliate. All Client trades are executed by broker/dealers independent of DVI.

DVI recommends broker/dealers with custodian capabilities with an emphasis placed on the security of Clients' assets, lowering costs and achieving best execution for our Clients. When making these recommendations, the Firm considers a broker/dealer's:

- Execution quality;
- Trade clearance and settlement capabilities;
- Insurance offering (in excess of SIPC insurance limits);
- Financial and operational stability;
- Willingness to negotiate low commission rates; and
- Client data security and cybersecurity control environment.

Based on these criteria, DVI normally recommends Clients custody their assets with and execute their brokerage through Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker/dealer and member of SIPC. DVI is independently owned and operated and is not affiliated with Schwab. There are certain situations where clients do use other custodians or broker/dealers for their accounts, typically at the direction of said Client. DVI retains the right to add other custodians or other broker/dealers to their recommended list, based upon business needs and industry opportunities. Before adding a new custodian, DVI will conduct a thorough evaluation and assessment of the targeted custodian's reputation, offered services, operational risks and business status.

Schwab provides DVI with access to institutional trading and custody services, which are typically not available to retail investors. None of the custodians utilized charge DVI or DVI Clients for these institutional services, but instead are compensated through trading commissions and other transaction-based or asset-based fees. Schwab provides DVI Clients institutional rate commission schedules with a flat-rate minimum ticket charge. Because of the flat-rate minimum ticket charge in the execution of aggregate Client orders, some Clients may pay a higher per-share commission rate than others.

Schwab also makes available to DVI other products and services that benefit DVI but may not benefit an individual Client's accounts directly. DVI uses these products and services to service all or some substantial number of the Firm's accounts, including accounts not maintained at Schwab. These products and services include software and other technology that:

- Provide access to Client account data (such as trade confirmations and account statements);
- Facilitate trade execution and allocate aggregated trade orders for multiple Client accounts;
- Provide research, securities pricing and other market data;
- Facilitate payment of DVI's fees from its Clients' accounts; and
- Assist with back-office functions, recordkeeping and Client reporting.

Other services offered by Schwab may not benefit DVI Clients directly but instead may help DVI manage and further develop its business enterprise. These include:

- Compliance, legal and business consulting tools and/or services;
- Publications and conferences on practice management and business succession;
- Industry education and/or speakers; and
- Access to employee benefits providers, human capital consultants and insurance providers.

Schwab may also make available, arrange and/or pay third-party vendors to provide these types of services to DVI. Fees for these services may be discounted or waived and would otherwise be charged to DVI if not for the existing custodial relationships. Other benefits such as educational events or occasional business entertainment for DVI personnel may also be provided by our primary custodians. In evaluating whether to recommend Clients to custody their assets at Schwab, DVI may take into account the availability of some of the foregoing products and services in addition to the primary criteria such as the nature, cost and quality of custody and brokerage services provided. Considering these secondary factors in the Firm's recommendations creates a potential conflict of interest. DVI mitigates this by periodically reviewing its custodian and broker/dealer relationships to ensure that the Firm's Clients are receiving the best possible custodial and brokerage services to meet their needs.

Limitations as a Consequence of Broker/Dealer Selection

Accounts held at Schwab are generally limited to executing transactions at each respective firm in order to avoid prime brokerage or trade away fees. When electing to assign custodial and brokerage services to these firms, DVI Clients will forego any of the benefits they may have had if their assets were held elsewhere, such as the Client's ability to directly negotiate commission schedules with the broker/dealer.

Directed Brokerage

Although DVI generally recommends that Clients establish accounts at Schwab, it is ultimately the Client's decision where to custody their assets and direct its investment transactions. A directed brokerage arrangement often results in DVI being unable to achieve best execution for the Client. When a Client directs DVI use a specific broker, it may cost the Client more money because the Firm may not be able to aggregate orders to reduce transaction costs, and the Client may also receive less favorable

execution prices.

Aggregation of Client Orders

DVI will aggregate purchase or sale orders of the same equity or ETF security held in two or more accounts (including for DVI employee trades) as a means of achieving best execution for all Clients and to ensure all Clients are treated fairly and equitably. In the event there are partially filled orders in the execution of a block trade, DVI will allocate the partial fills in a manner the Firm feels is most advantageous for Clients. Depending on factors, including the fill price of shares traded versus end-of-day price and the minimum brokerage commission of the accounts involved, DVI will allocate partial fills on either a pro rata basis or a computer-generated random basis to each Client participating in the block trade. In the event random allocations are used, accounts getting filled in the random allocation are determined by the Firm's trading order management software. Purchase and sale orders for DVI employees are included in Client block trades and are treated in the same manner as Client orders for pricing and allocation. In general, Client orders are assigned to block trades by the broker/dealer with which the Client has elected to place their assets (Custodian Designation).

Although pursued if possible, aggregating fixed income transactions across multiple accounts is usually not feasible. For fixed income securities, the allocation strategy for purchased individual securities is more typically based upon the practice of filling the oldest outstanding trade order first (FIFO), with a second screen allocating positions based upon the best fit for a Client portfolio composite. Best fit would be defined by the DVI goal of constructing a diversified portfolio and giving due consideration to current equity and fixed income holdings credit exposure.

Prime Brokerage

With Client consent, DVI maintains the ability to execute Client transactions on a prime brokerage basis, meaning security transactions can be executed through third-party broker/dealers. A separate transaction fee is imposed by Schwab to settle prime trades. This service is only utilized when DVI determines it is advantageous to the Client under best execution criterion.

Cross Transactions

On occasion, DVI may instruct brokers to effect "cross" transactions between Client accounts in which one Client will purchase securities sold by another Client. Such transactions are only entered into when the crossing price quoted by the executing broker is fair to both parties (by reference to independent market indicators or as otherwise prescribed by law) and DVI determines the transaction to be in the best interests of and constitutes "best execution" for both parties. Neither DVI nor any related party receives any compensation in connection with such "cross" transactions. The Firm does not allow cross transactions when either account is subject to ERISA.

Soft Dollar Benefits

DVI currently has no signed agreements with any firms that require a minimum amount of order flow or commission dollars in order to receive soft dollar research.

Other Potential Conflicts of Interest

From time to time, certain custodians, broker/dealers, or investment advisers/principal underwriters to open-end investment companies and closed-end funds may discount or waive attendance, marketing, travel, or other fees associated with industry conferences or speakers for DVI or DVI employees. This presents a potential conflict of interest in that DVI financially benefits from services it would otherwise have to pay for in an attempt to get DVI to recommend a custodian, broker/dealer, open-end investment company, or closed-end fund to Clients rather than basing these recommendations purely on our Clients' best interests. This conflict is mitigated by DVI's *Code of Ethics*, which imposes a strict fiduciary duty on DVI to always act in the best interests of Clients.

From time to time, certain custodians, broker/dealers or other third-party vendors may offer gifts and/or entertainment to DVI employees as a normal course of business. This presents a potential conflict of interest in that DVI or the employee may benefit from such gift or entertainment, and in turn may recommend such third-party company's service to Clients rather than basing these recommendations purely on the Clients' best interests. This conflict is mitigated by DVI's *Code of Ethics*, which imposes rules on the delivery and/or acceptance of such gifts or entertainment.

Trade Errors

It is the policy of DVI to act immediately to correct errors affecting Client accounts. If DVI determines an error has occurred with respect to executing Client transactions, the Firm will act in a timely manner to notify the Client's custodian of the error. Once notification is given, the error will be corrected by the Client's custodian and any resulting gains or losses will be handled in accordance with the custodian's trade error processing policies and procedures. DVI does business with multiple custodians and will make the respective custodian's trade error processing policies and procedures available upon request. In all instances, the Client will not incur any loss or costs resulting from a DVI trade error.

Item 13 Review of Accounts

Portfolio Management Review:

The DVI portfolio management team (including the Senior Vice President & Chief Investment Officer, Vice President of Portfolio Management, Senior Vice President, Investment Strategy, Portfolio Managers, Advisory Analysts, and Financial Analysts/Traders) reviews Client portfolios based on the following:

- Assurance that appropriate cash levels are maintained;
- Management of account restrictions and DVI's compliance to these constraints;
- Utilization of tax-loss harvesting for those accounts that are subject to taxation; and
- Active monitoring of individual security and industry weightings and their consistency with DVI's investment guidelines.

Portfolio reviews are completed as required by Client specific needs but not less frequently than annually. Reviews are generally completed with the Client in person or via the telephone or teleconference with the assigned Relationship Manager and Portfolio Manager. Accounts may also be reviewed in response to various potential triggers such as deposits or withdrawals, transfers, and changes in Client objectives or risk tolerances. Changes directed by the Investment Management Committee with respect to portfolio construction and security selection may also cause portfolio reviews to occur.

Oversight of Client Accounts:

Each Client relationship will have assigned to it both a Portfolio Manager and a Relationship Manager. In certain cases, the Portfolio Manager and Relationship Manager roles for a given Client may be performed by the same DVI employee. The intent of this policy is to make sure that there is a line of direct responsibility as it relates to:

- DVI's adherence to any asset allocation or investment policy constraint;
- The consistent application of DVI's investment process across all portfolios of the relationship composite; and
- An appropriate dialogue with the Client to incorporate changes in Client objectives with the management of the relationship.

All Clients should receive from the registered broker/dealer the following written and/or electronic reports:

Provided by the Registered Broker/Dealer:

1. Confirmation of all transactions supplied by the Client's chosen broker/dealer.
2. Complete monthly statements listing all portfolio holdings, the market value of the managed assets, and the transactions in the account during the month, supplied by the Client's chosen broker/dealer.
3. Year-end tax reporting such as 1099 and 1099Rs.

Provided by DVI Periodically:

1. Reports reconciled to the custodian statement; outlining positions held, cost basis, position and sector weightings and market valuation information.
2. Asset summary statements summarizing assets by portfolio and asset class.
3. Detailed quarterly performance reports providing monthly, year-to-date, and historical time-weighted total rate of return calculations.
4. Realized gain/(loss) reports summarizing year-to-date activity.
5. Transaction summary reports summarizing year-to-date purchases, sales, maturities, calls, contributions, withdrawals, and expenses.
6. Fixed income distribution reports illustrating distribution by maturity date and S&P rating.
7. Disclosures encouraging Clients to compare their DVI reports with their custodian statements to ensure that all their assets are listed.

As desired, Clients have the ability to access their statements as well as other communication deliverables via the secure, online DVI Client portal. Whenever possible, the DVI Client portal is used to transmit sensitive documents, financial statements or other information pertaining to a Client's DVI investment relationship.

Item 14 Client Referrals and Other Compensation

DVI has been fortunate to receive many Client referrals over the years. These referrals have come from current Clients, estate planning attorneys, accountants, employees, their friends and families and other similar sources. In most cases, the Firm does not compensate referring parties for these referrals. Those compensated are discussed below.

- DVI received Client referrals from Schwab through the Firm's participation in the Schwab Advisor Network (the "Service"). DVI is no longer active in the Service. Schwab is a broker-dealer independent of and unaffiliated with DVI. DVI pays Schwab a participation fee (15% of the fees the Client pays to DVI) on the existing Clients that were referred through the Service in the past.
- MCB, as an affiliated firm, has agreed to serve as a "Solicitor" or "Promoter" on behalf of DVI with a referral fee in an amount equal to 30% of the annual advisory fee charged by DVI.

If a Client is introduced to the Firm by a Promoter, the Firm may pay that Promoter a referral fee in accordance with the SEC's Marketing Rule (Rule 206(4)-1 of the Investment Advisers Act of 1940.) Any such referral fee shall be paid solely from DVI's

investment management fee and shall not result in an additional fee to the client. DVI does not charge referred Clients fees or costs greater than the fees or costs DVI charges Clients with similar portfolios who were not referred through a compensated party.

Additional Compensation

DVI does not accept referral fees or any form of remuneration from other professionals when DVI refers a prospect or Client to them.

DVI receives an economic benefit from Schwab in the form of the support products and services it makes available to the Firm and other independent investment advisors that have their Clients maintain accounts at Schwab. These products and services, how they benefit DVI, and the related conflicts of interest are described above (see *Item 12 Brokerage Practices*). The availability to the Firm of Schwab's products and services is not based on DVI giving particular investment advice, such as buying particular securities for its Clients.

Item 15 Custody

Although DVI generally tries to avoid holding or obtaining possession of Client securities, the Firm is deemed to have custody of Client funds or securities for purposes of the SEC Custody Rule. Such custody is deemed to occur due to its authority to deduct its advisory fees from Client accounts, when DVI assists Clients in transferring assets held by some custodians to a third party, and when DVI professionals act as trustees, secondary trustees or authorized agents for certain Client assets. DVI is also deemed to have custody of any Client funds or securities (but not checks drawn by Clients and made payable to third parties) unless received inadvertently and returned to sender within three business days of receiving them; provided, subject to certain exceptions permitted for proceeds of class actions, bankruptcies or reorganizations, or tax refunds, which may be forwarded within five business days.

As a result of having custody of Client securities in certain instances, the Firm is subject to an annual Surprise Custody Examination which reviews the processes and controls in place to ensure DVI's ongoing compliance with all applicable rules and regulations.

Differences Between Our Reports and Custodial Statements

Reports that Clients receive from DVI can differ from the statements Clients receive from their custodian. Every month, DVI reconciles Client accounts according to the security holdings and transactions provided by their month-end custodial statement. Although security holdings and transactions are reconciled, market values are not reconciled and can be different (see the *Pricing of Securities* section in *Item 5 Fees & Compensation*).

The Firm encourages Clients to compare their DVI report packages with their custodian statements to ensure that all of their assets are listed and contact DVI at the contact information listed on the front of this Brochure to report any discrepancies.

Item 16 Investment Discretion

All Clients provide DVI certain limited powers of attorney through the brokerage account application. All discretionary Clients sign a DVI IAA which grants DVI limited power of attorney to exercise discretion in managing Client investment accounts. This discretion allows DVI to buy, sell, exchange, convert and otherwise trade in all stocks, bonds and other securities without seeking permission from the Client. Additionally, the custodial/brokerage account application signed by the Client appoints DVI as the Client's investment advisor and allows DVI to execute trades on the Client's behalf.

The investment discretion granted to DVI is subject to limitations and restrictions specified by the Client and documented in the Client's Investment Policy Statement located within the IAA. These limitations and restrictions govern items such as the asset allocation targets between stocks and bonds or the prohibited buying or selling of specific securities or security types. Clients retain the right to amend these limitations and restrictions at any time by providing written instructions to DVI, which is attached as an amendment to the Client's IAA.

Item 17 Voting Client Securities

Voting Policies

DVI accepts authority to vote Client securities. The DVI Investment Committee is responsible for determining votes for all proxy issues. DVI subscribes to Glass Lewis & Co., a recognized leader in corporate governance research, to provide voting guidance on any corporate governance topic.

DVI's Investment Committee has adopted the Glass Lewis & Co. Proxy Voting Guidelines and believes they are consistent with the best interest of the Clients the Firm serves. This includes votes where Glass Lewis & Co. recommends a vote against a company's management. The DVI Investment Committee will document any decisions to vote a proxy differently than the recommendation from Glass Lewis & Co.

Disclosures Regarding Use of Proxy Advisory Firm, Pre-Population & Automated Voting

Broadridge is a "Proxy Advisory Firm" which DVI has engaged to assist with voting our Clients' proxies. The Proxy Advisory Firm provides an electronic proxy management system which allows: (1) population of each Client's votes on the Proxy Advisory Firm's electronic voting platform with the Proxy Advisory Firm's recommendations ("pre-population"); and (2) automatic submission of the Client's votes to be counted ("automated voting"). Pre-population and automated voting generally occur prior to the submission deadline for proxies to be voted at a shareholder meeting.

Proxy Administration

The Chief Compliance Officer and staff has responsibility for implementation of the Investment Committee's voting decisions, as well as responsibility for proxy administration and recordkeeping. DVI has engaged the services of Broadridge (ProxyEdge) to assist in the administration, voting and recordkeeping process.

Some Clients retain the right to vote proxies on their own. These Clients receive the proxy materials directly from their custodian or the applicable company's transfer agent. Clients can contact the Senior Vice President & Chief Investment Officer at 309-685-0033 if they have questions about a particular solicitation or if they wish to obtain a copy of the DVI proxy voting guidelines.

Conflicts of Interest

As a result of DVI's normal order of business, it is possible that conflicts of interest could develop in making proxy voting decisions. Examples of potential conflicts of interest could include but are not limited to:

1. DVI has a business relationship with a proponent of a proxy proposal, and this business relationship may influence how DVI casts its vote.
2. DVI has business or personal relationships with participants in a proxy contest, corporate directors or candidates for directorships.
3. DVI manages a retirement plan or provides other services to a company whose management is soliciting proxies.

In instances where DVI has a material conflict of interest, the Firm will default to Glass Lewis & Co.'s proxy voting guidelines.

Disclosure

DVI will communicate how Clients may obtain a copy of the DVI detailed proxy voting policies and procedures during the first quarter of each year and with new Clients throughout the year.

Item 18 Financial Information

DVI does not believe there is any financial condition that is reasonably likely to impair its ability to meet contractual commitments to Clients.

Additional Disclosures:

Privacy Policy

Policy Statement to Our Clients

DVI recognizes that it has an obligation to keep Client information secure and confidential. DVI does not sell or share Client information to anyone outside of the organization, other than as described in the Firm's *Privacy Policy* or as otherwise allowed or required by law. For this reason, DVI does not request permission to share Client information. Clients do not need to take any action to prevent disclosure by DVI of their private information.

Security of Client Information

DVI takes precautions to prevent Client information from inadvertently being disclosed. The Firm maintains a system of physical, electronic and procedural safeguards to protect Client information and when new technologies become available, the Firm makes appropriate upgrades to this system. DVI's network has long been proactively monitored by third-party IT security services for cybersecurity threats, and this service helps proactively find and fix vulnerabilities to protect Client information. In addition, ongoing internal and external penetration testing of security provisions and protocols is performed.

Collection of Information

DVI only collects information as needed to service Client accounts. DVI typically collects just two types of information. The first type is information Clients provide on account-opening documents, such as names and addresses, as well as investment objectives and opening account balances. The second type is information about each Client's accounts, including transaction histories and Client communications such as account statements and correspondence.

Sharing of Information for Completing Transactions

As necessary to carry out services to Clients, DVI may share Client account information with brokers who execute trades for or who have custody of such Client accounts.

Business Continuity Plan

DVI has policies in place to respond to and mitigate the potential impact from a Significant Business Disruption ("SBD"). In the event of an SBD, these policies allow the Firm to 1) quickly and effectively assess the situation, 2) implement a mitigation/recovery effort, 3) provide the necessary communications and 4) resume full operations as soon as possible, all while ensuring employee safety, business/Client data protection, and a continuation of Client services and business processes. Through its *Business Continuity*, *Disaster Recovery, Incident Response* and *Emergency Response Plans* as well as its full library of policies and procedures, the Firm will have the resources, personnel, facilities, equipment and procedures in place to minimize the impact of any potential operational issue.

DVI reviews and monitors its plans regularly to identify mission critical systems and mitigate operational risks. The Firm performs daily electronic file backups and archives data both onsite and offsite. DVI's goals include the safety and welfare of its employees, accessibility to essential systems and communications, and the resumption of business operations within a reasonable amount of time.

In the event DVI's current facilities are deemed inaccessible, the Firm may establish a temporary recovery site(s) from which to resume business services. DVI will make every effort to immediately notify its Clients, employees, business associates, and vendors of the location of the recovery site(s), how to contact the Firm, and the estimated time when normal business operations will resume.

The team approach described in *Item 4 Advisory Services* and *Item 13 Review of Accounts* gives DVI the ability to continue managing both the Firm as well as Client accounts in the event of a serious disability or death of an individual member of the management committee or each Client's team.

Conflicts of Interest

Since its inception, it has been DVI's policy to avoid any practice that is adverse in any respect to its Client's interests or is the result of a conflict of interest. This policy is evident in the Firm's strict *Code of Ethics* which applies to investments by DVI employees for their own accounts. While DVI strives to avoid conflicts, the Firm is cognizant that conflicts may nevertheless arise, and it is the Firm's policy to fully and fairly disclose known material conflicts to Clients.

Personal interests, both inside and outside of DVI that could be placed ahead of obligations to Clients, could be the source of actual or potential conflicts of interest. Employees must remain aware that just the opportunity to act improperly may create the appearance of conflict and that conflicts may exist even in the absence of wrongdoing. Employees are required to make a full and timely disclosure of any situation that could result in a potential conflict or the appearance of a conflict of interest. Employees may not take advantage of any opportunity or otherwise personally benefit from information obtained as an employee that would not have been available otherwise.

To identify potential sources of conflicts of interest and to assess how those conflicts are addressed by our compliance program, the Firm performs regular reviews. This process has been developed and improved, since our inception, with input from the Chief Compliance Officer and the Management Committee. Both the DVI Compliance Committee and Internal Controls Committee are tasked with managing risk within the Firm, are chaired by the Chief Compliance Officer, and are populated by other officers as well as specific employees representing each operational department.

Please see *Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading* and *Item 12 Brokerage Practices* for a more detailed description of these policies.

DVI's compliance program is designed to identify, monitor and address such risks by utilizing a 3-step compliance risk assessment process, consisting of:

1. An inherent assessment of risks,
2. A control environment assessment, and
3. A residual risk assessment.

The resulting risk scores assist with prioritizing areas for improvement and compliance focus.

David Vaughan Investments, LLC

5823 N. Forest Park Drive
Peoria, IL 61614
P 309.685.0033
F 309.685.3665

399 Carolina Avenue, Suite 110
Winter Park, FL 32789
P 407.622.5133
F 407.622.5135

www.dviinc.com

Form ADV Part 2B: Brochure *Supplement*

Item 1 Cover Page

DVI
DAVID VAUGHAN INVESTMENTS

Lawrence Williams IV, Chairman, President & Chief Executive Officer	**David Vaughan Investments, LLC** 5823 N. Forest Park Drive Peoria, IL 61614 P 309.685.0033 F 309.685.3665 399 Carolina Avenue, Suite 110 Winter Park, FL 32789 P 407.622.5133 F 407.622.5135 www.dviinc.com
Brian A. Christensen, CFA, Senior Vice President	
Patrick J. Smarjesse, CEBS, Senior Vice President	
Stephen K. Hinrichs, CFA, Senior Vice President & Chief Investment Officer	
Todd M. Sheridan, CFA, Vice President, Portfolio Management & Research	
Stephanie A. Ricketts, CFP®, Managing Director, Relationship Management & Client Services	
Jeffrey J. Huizenga, CFP®, ChFC®, MSFS, Director, Wealth Strategies	
Deanna M. Baele, CFP®, Relationship Manager	
Andrew J. Lister, CFA, Senior Portfolio Manager	
Meghan J. Jackson, Trader	
Dalton M. Mellon, CFA, Portfolio Manager	
J. Pierce Timko, CFA, CFP®, Managing Director, Investment Research	
Glenn J. Maxey, CFA, Chief of Staff & Senior Portfolio Manager	
Michael M. Flaherty, CFP®, ChFC®, Managing Director, Relationship Management	
Zachery R. Morgenstern, CFP®, Relationship Manager	
Michael E. Armistead, CFP®, Relationship Manager – Florida Region	
Christopher T. Kent, CFA, CFP®, Associate Portfolio Manager – Florida Region	
Alexis L. Morey, CFP®, Assistant Relationship Manager	
Devin J. Shaffer, CFA, Portfolio Management Analyst – Florida Region	
Jade M. Laverdiere, Assistant Relationship Manager – Florida Region	
Ryan D. Sewell, CFP®, Managing Director & Senior Relationship Manager – Florida Region	
Cody J. Behrens, CFA, ChFC®, Portfolio Manager	

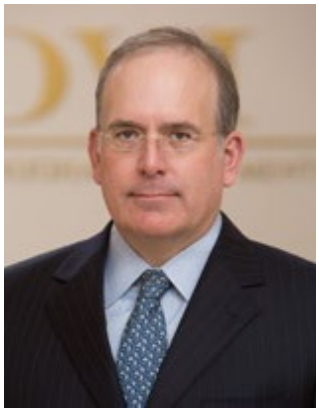
Form ADV Part 2B: *Brochure Supplement*
August 20, 2026

This brochure provides information about the David Vaughan Investments, LLC ("DVI" or "the Firm") Associates listed above that supplements the *DVI Firm Brochure.* Questions about the contents of this brochure may be answered by contacting DVI at the telephone number and/or email address listed above. 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.

Additional information about DVI is available on the SEC's website at www.adviserinfo.sec.gov. This site can be searched by using a unique identifying number, known as a CRD number. DVI's unique CRD number is 105990. DVI's Form ADV Part 2A and Part 2B can also be found at www.dviinc.com.

DVI is registered with the SEC as an investment adviser. Registration does not imply a certain level of skill or training.

Lawrence Williams IV, Chairman, President & CEO
CRD # 2254189



Item 2: Educational Background and Business Experience (last 5 years)

Birthdate: (1963)

Education: Denison University, BA (1985)
Bradley University, MBA (1993)

Experience: President & CEO, David Vaughan Investments, LLC
Chairman, Board of Managers, David Vaughan Investments, LLC

Item 3 Disciplinary Information

None

Item 4 Other Business Activities

Shareholder, DVI Capital Corp.
Board of Directors, Morton Community Bank
Vice President, Hometown Community Bancorp
Shareholder, Hometown Community Bancorp, Inc.

See discussion regarding *Other Business Activities* on page 13

Item 5 Additional Compensation

See discussion regarding *Additional Compensation* on page 13

Item 6 Supervision

Reports to: The David Vaughan Investments, LLC Board of Managers

See discussion regarding *Supervision* on page 13

Brian A. Christensen, CFA, Senior Vice President
CRD # 1643784

Item 2: Educational Background and Business Experience (last 5 years)

Birthdate: (1964)

Education: Eastern Illinois University, BS (1986)
Illinois State University, MBA (1987)

Experience: Senior Vice President & CIO, David Vaughan Investments, LLC
Board of Managers, David Vaughan Investments, LLC
Senior Vice President, David Vaughan Investments, LLC (2026)

Item 3 Disciplinary Information

None

Item 4 Other Business Activities

Shareholder, DVI Capital Corp.
Board of Directors, DVI Capital Corp.
Shareholder, Hometown Community Bancorp, Inc.

See discussion regarding *Other Business Activities* on page 13

Item 5 Additional Compensation

See discussion regarding *Additional Compensation* on page 13

Item 6 Supervision

Reports to: Lawrence Williams IV, Chairman, President & CEO
309.685.0033

See discussion regarding *Supervision* on page 13

Patrick J. Smarjesse, CEBS, Senior Vice President
CRD # 1385119

Item 2: Educational Background and Business Experience (last 5 years)

Birthdate: (1962)

Education: Illinois Central College (1982)
University of Wisconsin-La Crosse, BS (1984)

Experience: Vice President, David Vaughan Investments, LLC
Senior Vice President, David Vaughan Investments, LLC (2023)
Senior Vice President, Relationship Management, David Vaughan Investments, LLC (2025)
Senior Vice President, David Vaughan Investments, LLC (2026)

Item 3 Disciplinary Information

None

Item 4 Other Business Activities

Shareholder, DVI Capital Corp.
Shareholder, Hometown Community Bancorp, Inc.

See discussion regarding *Other Business Activities* on page 13

Item 5 Additional Compensation

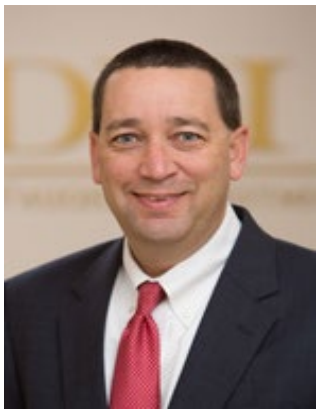
See discussion regarding *Additional Compensation* on page 13

Item 6 Supervision

Reports to: Lawrence Williams IV, Chairman, President & CEO
309.685.0033

See discussion regarding *Supervision* on page 13

Stephen K. Hinrichs, CFA, Senior Vice President & Chief Investment Officer
CRD # 4341093



Item 2: Educational Background and Business Experience (last 5 years)

Birthdate: (1969)

Education: University of Illinois at Urbana-Champaign, BA (1991)

Experience: Director of Investment Research, David Vaughan Investments, LLC
Vice President of Investment Research, David Vaughan Investments, LLC (2023)
Senior Vice President, Investment Strategy, David Vaughan Investments, LLC (2025)
Senior Vice President & Chief Investment Officer, David Vaughan Investments, LLC (2026)

Item 3 Disciplinary Information

None

Item 4 Other Business Activities

Shareholder, DVI Capital Corp.
Board of Directors, DVI Capital Corp.
Shareholder, Hometown Community Bancorp, Inc.

See discussion regarding *Other Business Activities* on page 13

Item 5 Additional Compensation

See discussion regarding *Additional Compensation* on page 13

Item 6 Supervision

Reports to: Brian A. Christensen, Senior Vice President
309.685.0033

See discussion regarding *Supervision* on page 13

Todd M. Sheridan, CFA, Vice President, Portfolio Management & Research
CRD # 2364260

Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (1966)

Education: University of Illinois at Urbana-Champaign, BS (1988)

Experience: Vice President, David Vaughan Investments, LLC
Vice President, Portfolio Management & Research, David Vaughan Investments, LLC (2026)

Item 3 *Disciplinary Information*

None

Item 4 *Other Business Activities*

Shareholder, DVI Capital Corp.
Shareholder, Hometown Community Bancorp, Inc.

See discussion regarding *Other Business Activities* on page 13

Item 5 *Additional Compensation*

See discussion regarding *Additional Compensation* on page 13

Item 6 *Supervision*

Reports to: Lawrence Williams IV, Chairman, President & CEO
309.685.0033

See discussion regarding *Supervision* on page 13

Stephanie A. Ricketts, CFP®, Managing Director, Relationship Management & Client Services
CRD# 3249842

Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (1971)

Education: Bradley University, BA (1994)
Bradley University, MBA (2002)

Experience: Senior Relationship Manager, David Vaughan Investments, LLC (2020)
Director of Client Services & Senior Relationship Manager, David Vaughan Investments, LLC (2022)
Managing Director, Relationship Management & Client Services, David Vaughan Investments, LLC (2025)

Item 3 *Disciplinary Information*

None

Item 4 *Other Business Activities*

Shareholder, DVI Capital Corp. (2022)

See discussion regarding *Other Business Activities* on page 13

Item 5 *Additional Compensation*

See discussion regarding *Additional Compensation* on page 13

Item 6 *Supervision*

Reports to: Patrick J. Smarjesse, Senior Vice President
309.685.0033

See discussion regarding *Supervision* on page 13

Jeffrey J. Huizenga, CFP®, ChFC®, MSFS, Director, Wealth Strategies
CRD# 2409162

Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (1972)

Education: University of Dubuque, BS-Business Administration (1994)

Experience: Director of Relationship Management, David Vaughan Investments, LLC (2018)
Director, Wealth Strategies, David Vaughan Investments, LLC (2022)

Item 3 *Disciplinary Information*

None

Item 4 *Other Business Activities*

Shareholder, DVI Capital Corp.

See discussion regarding *Other Business Activities* on page 13

Item 5 *Additional Compensation*

See discussion regarding *Additional Compensation* on page 13

Item 6 *Supervision*

Reports to: Patrick J. Smarjesse, Senior Vice President
309.685.0033

See discussion regarding *Supervision* on page 13

Deanna M. Baele, CFP®, Relationship Manager
CRD # 2636105

Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (1973)

Education: Monmouth College, BA (1995)
St. Ambrose University, MBA (2000)

Experience: Executive Office Advisor, David Vaughan Investments, LLC
Relationship Manager, David Vaughan Investments, LLC (2025)

Item 3 *Disciplinary Information*

None

Item 4 *Other Business Activities*

None

Item 5 *Additional Compensation*

See discussion regarding *Additional Compensation* on page 13

Item 6 *Supervision*

Reports to: Stephanie A. Ricketts, Managing Director, Relationship Management & Client Services
309.685.0033

See discussion regarding *Supervision* on page 13

Andrew J. Lister, CFA, Senior Portfolio Manager
CRD # 3191245

Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (1974)

Education: University of Hawaii, BBA-Finance (1998)
University of Chicago, MBA (2005)

Experience: Portfolio Manager, David Vaughan Investments, LLC
Senior Portfolio Manager, David Vaughan Investments, LLC (2025)

Item 3 *Disciplinary Information*

None

Item 4 *Other Business Activities*

None

Item 5 *Additional Compensation*

See discussion regarding *Additional Compensation* on page 13

Item 6 *Supervision*

Reports to: Steven K. Hinrichs, Senior Vice President & Chief Investment Officer
309.685.0033

See discussion regarding *Supervision* on page 13

Meghan J. Jackson, Trader
CRD# 4518777

Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (1980)

Education: Monmouth College, BBA-Business Administration (2002)

Experience: Portfolio Analyst & Trader, David Vaughan Investments, LLC
Trader, David Vaughan Investments, LLC (2025)

Item 3 *Disciplinary Information*

None

Item 4 *Other Business Activities*

None

Item 5 *Additional Compensation*

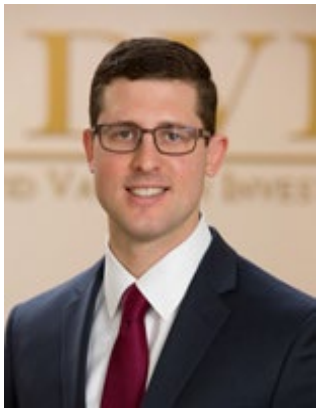
See discussion regarding *Additional Compensation* on page 13

Item 6 *Supervision*

Reports to: Andrew J. Lister, Senior Portfolio Manager
309.685.0033

See discussion regarding *Supervision* on page 13

Dalton M. Mellon, CFA, Portfolio Manager
CRD# 6070698



Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (1990)

Education: University of Illinois-Champaign, BS-Finance (2013)

Experience: Portfolio Manager, David Vaughan Investments, LLC (2020)

Item 3 *Disciplinary Information*

None

Item 4 *Other Business Activities*

None

Item 5 *Additional Compensation*

See discussion regarding *Additional Compensation* on page 13

Item 6 *Supervision*

Reports to: Andrew J. Lister, Senior Portfolio Manager
309.685.0033

See discussion regarding *Supervision* on page 13

J. Pierce Timko, CFA, CFP®, Managing Director, Investment Research
CRD# 5198721

Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (1984)

Education: Stetson University, BS-Business Administration (2007)

Experience: Portfolio Manager, David Vaughan Investments, LLC
Senior Portfolio Manager, David Vaughan Investments, LLC (2025)
Managing Director, Investment Research, David Vaughan Investments, LLC (2026)

Item 3 *Disciplinary Information*

None

Item 4 *Other Business Activities*

Associate Partner, DVI Capital Corp.

Item 5 *Additional Compensation*

See discussion regarding *Additional Compensation* on page 13

Item 6 *Supervision*

Reports to: Stephen K. Hinrichs, Senior Vice President & Chief Investment Officer
309.685.0033

See discussion regarding *Supervision* on page 13

Glenn J. Maxey, CFA, Chief of Staff & Senior Portfolio Manager
CRD# 6513462

Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (1992)

Education: Southern Methodist University, BBA-Finance (2015)

Experience: Assistant Portfolio Manager, David Vaughan Investments, LLC (2021)
Portfolio Manager, David Vaughan Investments, LLC (2022)
Director & Portfolio Manager, David Vaughan Investments, LLC (2024)
Director & Senior Portfolio Manager, David Vaughan Investments, LLC (2025)
Chief of Staff & Senior Portfolio Manager, David Vaughan Investments, LLC (2026)

Item 3 *Disciplinary Information*

None

Item 4 *Other Business Activities*

Shareholder, DVI Capital Corp. (2024)

See discussion regarding *Other Business Activities* on page 13

Item 5 *Additional Compensation*

See discussion regarding *Additional Compensation* on page 13

Item 6 *Supervision*

Reports to: Stephen K. Hinrichs, Senior Vice President & Chief Investment Officer
309.685.0033

See discussion regarding *Supervision* on page 13

Michael M. Flaherty, CFP®, ChFC®, Managing Director, Relationship Management
CRD# 5558877

Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (1979)

Education: Illinois Valley Community College (2000)
Illinois State University, BS-Insurance (2002)

Experience: Relationship Manager, David Vaughan Investments, LLC
Senior Relationship Manager, David Vaughan Investments, LLC (2024)
Managing Director, Relationship Management, David Vaughan Investments, LLC (2026)

Item 3: *Disciplinary Information*

None

Item 4: *Other Business Activities*

Associate Partner, DVI Capital Corp.

See discussion regarding *Other Business Activities* on page 13

Item 5: *Additional Compensation*

See discussion regarding *Additional Compensation* on page 13

Item 6: *Supervision*

Reports to: Patrick J. Smarjesse, Senior Vice President
309.685.0033

See discussion regarding *Supervision* on page 13

Zachery R. Morgenstern, CFP®, Relationship Manager
CRD# 7063632

Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (1994)

Education: Augustana College, BS-Accounting & BS-Business Admin-Finance (2017)

Experience: Assistant Relationship Manager, David Vaughan Investments, LLC (2021)
Relationship Manager, David Vaughan Investments, LLC (2024)

Item 3: *Disciplinary Information*

None

Item 4: *Other Business Activities*

None

Item 5: *Additional Compensation*

See discussion regarding *Additional Compensation* on page 13

Item 6: *Supervision*

Reports to: Stephanie A. Ricketts, Managing Director, Relationship Management & Client Service
309.685.0033

See discussion regarding *Supervision* on page 13

Michael E. Armistead, CFP®, Relationship Manager – Florida Region
CRD# 5842629

Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (1988)

Education: Flagler College, BA-Business Administration (2010)
University of Central Florida, MBA (2022)

Experience: Private Client Advisor, Charles Schwab & Co. (2017)
Relationship Manager, David Vaughan Investments, LLC (2022)

Item 3: *Disciplinary Information*

None

Item 4: *Other Business Activities*

None

Item 5: *Additional Compensation*

See discussion regarding *Additional Compensation* on page 13

Item 6: *Supervision*

Reports to: Ryan D. Sewell, Managing Director & Senior Relationship Manager
309.685.0033

See discussion regarding *Supervision* on page 13

Christopher T. Kent, CFA, CFP®, Associate Portfolio Manager
CRD# 7817336

Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (2001)

Education: Stetson University, BS-Business Administration (2023)

Experience: Advisory Analyst, David Vaughan Investments, LLC (2023)
Associate Portfolio Manager, David Vaughan Investments, LLC (2025)

Item 3: *Disciplinary Information*

None.

Item 4: *Other Business Activities*

None

Item 5: *Additional Compensation*

See discussion regarding *Additional Compensation* on page 13

Item 6: *Supervision*

Reports to: Pierce Timko, Managing Director, Investment Research
309.685.0033

See discussion regarding *Supervision* on page 13

Alexis L. Morey, CFP®, Assistant Relationship Manager
CRD# 7433297

Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (1998)

Education: Illinois State University, BS-Business Finance & Insurance (2020)

Experience: Office Manager & Agent, Migration Risk Management (2020)
Registered Representative, Silver Oak Securities (2022)
Assistant Relationship Manager, David Vaughan Investments, LLC (2023)

Item 3: *Disciplinary Information*

None

Item 4: *Other Business Activities*

None

Item 5: *Additional Compensation*

See discussion regarding *Additional Compensation* on page 13

Item 6: *Supervision*

Reports to: Michael M. Flaherty, Managing Director, Relationship Management
309.685.0033

See discussion regarding *Supervision* on page 13

Devin J. Shaffer, CFA, Portfolio Management Analyst
CRD# 7745063

Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (2001)

Education: Stetson University, BBA-Management & Finance (2024)

Experience: Advisory Analyst, David Vaughan Investments, LLC (2024)
Portfolio Management Analyst, David Vaughan Investments, LLC (2025)

Item 3: *Disciplinary Information*

None

Item 4: *Other Business Activities*

None

Item 5: *Additional Compensation*

See discussion regarding *Additional Compensation* on page 13

Item 6: *Supervision*

Reports to: Pierce Timko, Managing Director, Investment Research
309.685.0033

See discussion regarding *Supervision* on page 13

Jade M. Laverdiere, Assistant Relationship Manager
CRD# 8120668

Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (2003)

Education: Bradley University, BS - Personal Financial Planning & Minor - Accounting (2025)

Experience: Relationship Management Admin Associate, David Vaughan Investments, LLC (2023)
Assistant Relationship Manager, David Vaughan Investments, LLC (2025)

Item 3: *Disciplinary Information*

None

Item 4: *Other Business Activities*

None

Item 5: *Additional Compensation*

See discussion regarding *Additional Compensation* on page 13

Item 6: *Supervision*

Reports to: Michael M. Flaherty, Managing Director, Relationship Management
309.685.0033

See discussion regarding *Supervision* on page 13

Ryan D. Sewell, CFP®, Managing Director & Senior Relationship Manager
CRD# 5873355

Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (1979)

Education: Purdue University, BS-Industrial Management (2003)
Xavier University, MBA (2010)

Experience: Vice President, Senior Branch Manager, E*Trade Financial (2015)
Director of Strategic Partnerships, Wealth Enhancement Group (2022)
Vice President, Head of Retail Strategy, Allworth Financial (2024)
Managing Director & Senior Wealth Advisor, David Vaughan Investments, LLC (2025)

Item 3: *Disciplinary Information*

None

Item 4: *Other Business Activities*

None

Item 5: *Additional Compensation*

See discussion regarding *Additional Compensation* on page 13

Item 6: *Supervision*

Reports to: Patrick J. Smarjesse, Senior Vice President
309.685.0033

See discussion regarding *Supervision* on page 13

Cody J. Behrens, CFA, ChFC®, Portfolio Manager
CRD# 6451469

Item 2: *Educational Background and Business Experience (last 5 years)*

Birthdate: (1990)

Education: Eureka College, BS-Business Administration (2015)

Experience: Registered Representative, COUNTRY Capital Management Company (2019)
Internal Wholesaler, COUNTRY Trust Bank (2019)
Portfolio Manager, David Vaughan Investments, LLC (2026)

Item 3: *Disciplinary Information*

None

Item 4: *Other Business Activities*

None

Item 5: *Additional Compensation*

See discussion regarding *Additional Compensation* on page 13

Item 6: *Supervision*

Reports to: Glenn J. Maxey, Chief of Staff & Senior Portfolio Manager
309.685.0033

See discussion regarding *Supervision* on page 13

ADDITIONAL DISCUSSION

Item 4 Other Business Activities

On September 29, 2017, Hometown Community Bancorp ("HCB"), a privately held community bank located in Central Illinois, acquired a majority interest in DVI. As a result, DVI is an operating subsidiary of HCB. Morton Community Bank ("MCB") is a wholly owned direct subsidiary of HCB. DVI's operations are managed independently from HCB and MCB and potential conflicts of interest are minimized and disclosed accordingly. Please see Item 10 of our *ADV Part 2A* for information on our affiliated relationships and related conflicts of interest.

Related to this transaction, DVI Capital Corp. (an S-Corp) was created as a holding company to represent the David Vaughan Investments, LLC (operating company) ownership interests of the management, family and independent director shareholders.

Item 5 Additional Compensation

All DVI employees, including management shareholders, participate in an annual short-term incentive plan based upon firm profitability and meeting or exceeding established targets on key business performance metrics.

As part of DVI's ongoing development and succession plans, select high-potential DVI employees may be paid retention bonuses and/or participate in a Unit Appreciation Rights ("UAR") Plan. This UAR Plan has been established to provide potential participation in the future profitability of the firm without conferring full shareholder status.

All DVI management shareholders participate in an annual long-term incentive plan, established in 2022, based upon the firm's attainment of certain metrics that drive superior long-term business results.

All non-shareholder DVI employees and management shareholders with less than 5% share ownership in DVI Capital Corp. participate in a marketing incentive compensation plan that is based on the total firm's growth of net new assets under management each quarter.

Finally, all DVI management shareholders participate in a non-qualified deferred compensation plan and all non-shareholder employees participate in a supplementary bonus plan, both used for the payment of specific year-end compensation that is in excess of annual 401-(k) plan contributions.

Item 6 Supervision

DVI's *Associate Handbook*, *Code of Ethics* and *Compliance Policies and Procedures Manual* govern the supervision of employees. The Chief Operating Officer, Alfredo A. Risi, is responsible for the implementation and administration of the Associate Handbook and reviews and signs all investment advisory agreements. DVI's Investment Committee is responsible for oversight of the investment management process. DVI's Senior Vice President & Chief Investment Officer, Brian A. Christensen, oversees the Investment Committee's general control of the investment management process. The Chief Compliance Officer, Michael A. Price, is responsible for implementing and administering the *Code of Ethics and Compliance Policies and Procedures Manual* which includes portfolio management procedures. Testing is performed to verify that these procedures are followed.

Professional Certifications and Designations

CFA

The Chartered Financial Analyst® (CFA®) charter is a professional designation established in 1962 and awarded by the CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over the course of two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

CFP®

The Certified Financial Planner® (CFP®) certification is a voluntary certification. It is recognized for its high standard of professional education; stringent code of conduct and standards of practice; and ethical requirements that govern professional engagements with clients. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services and attain a bachelor's degree from a regionally accredited United States college or university. CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

Ethics – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® mark:

Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the S*tandards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and

Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

CEBS

The Certified Employee Benefits Specialist (CEBS) professional designation was established in 1976 and is awarded by the International Foundation of Employee Benefit Plans. To earn the CEBS designations, candidates must complete six required and two optional classes and pass a two-hour examination for each completed course. The required courses include *Group Health Plan Design, Group Benefits Management, Retirement Plan Design and Management, Human Resources and Compensation Management, and Compensation Concepts and Principles*. Two of the following elective courses need to be completed as well *Asset Management, Health Care Financing and Economic, Executive Compensation and Compensation Issues, Personal Financial Planning Concepts and Principles,* and/or *Personal Financial Planning Tax and Estate Planning Techniques*. In addition, CEBS designees must meet the Precertification Standards and agree to abide by the Principles of Conduct.

ChFC®

The Chartered Financial Consultant (ChFC®) designation has been a mark of excellence for financial planners for over thirty years. The curriculum covers extensive education and application training in all aspects of financial planning, income taxation, investments, and estate and retirement planning.

Educational Requirements - ChFC® candidates must complete eight college-level courses, seven required and two electives. The required courses include *Financial Planning: Process and Environment*; *Fundamentals of Insurance Planning*; *Income Taxation*; *Planning for Retirement Needs*; *Investments*; *Fundamentals of Estate Planning*; *Personal Financial Planning* and *Financial Planning Applications*.

Prerequisites/Experience - Requires three-years of full-time, relevant business experience.

Ethics - Must adhere to The American College's Code of Ethics, which includes the following professional pledge: "I shall, in light of all conditions surrounding those I serve, which I shall make every conscientious effort to ascertain and understand, render that service which, in the same circumstances, I would apply to myself."

Examinations - Requires nine closed-book, course-specific, two-hour proctored exams.

Continuing Education - 30 hours of continuing education every two years.

Enforcement - Designation may be removed for unethical conduct through the certification committee of The American College's Board of Trustees.

MSFS

The Master of Science in Financial Services (MSFS) is an accredited degree program that is offered by the American College of Financial Services and provides professionals with the tools needed to analyze, plan and implement integrated financial and life strategies for clients. The MSFS degree curriculum for graduation includes nine required courses and three electives, with courses including both practical case studies and client/practitioner scenarios including two, one week on-campus residencies of traditional classroom instruction and concluding with an exam. The goals for the program are for graduates to be able to work more effectively with high-net-worth clients and integrate ethical considerations into the financial planning process, become an expert in the wealth accumulation process, gain a better understanding of how to work with business owners to develop compensation, succession planning and retirement strategies and guide individuals in the areas of tax minimization, retirement planning, and estate planning.

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