

December 5, 2019

Mr. Michael McCord  
Pinnacle Wealth Management  
20719 Sterlington Drive  
Suite 104  
Land O'Lakes, FL 34638  
United States

**CEFEX File: CFX-10487**

The Centre for Fiduciary Excellence (CEFEX) has conducted a fiduciary assessment of **Pinnacle Wealth Management**, (the "Advisor") to determine whether Advisor's practices in providing investment advice to clients conform generally to the fiduciary standards of excellence (referred to as the Fiduciary Practices) as defined by the *Prudent Practices for Investment Advisors (U.S. Edition)* handbook as published by Fi360<sup>®</sup>, Inc. a Broadridge Company (Fi360) (the Handbook).<sup>1</sup> Compliance with applicable legal and ethical practices in providing investment advice to clients is the responsibility of the Advisor. The responsibility of CEFEX is to express an opinion on whether the Advisor generally conforms to the Fiduciary Practices in the conduct of its business based on our assessment.

CEFEX conducted its assessment in accordance with the *CEFEX Assessment of Fiduciary Excellence for Investment Advisors (U.S. Edition)* (the CAFE) prepared by Fi360. The assessment was conducted, and a draft report was prepared by **Robert J. Coopman**. The CEFEX Analyst's work papers and draft report were reviewed by the CEFEX Registration Committee (CRC) to ensure impartiality. The assessment requires that the Analyst plan and perform a review of a representative sample of the Advisor's written records, interviews with appropriate personnel of the Advisor and, on a test basis, evidence

---

<sup>1</sup> The Handbook describing fiduciary best practices for investment advisors is available at [www.cefex.org](http://www.cefex.org).

supporting the actions taken by the Advisor in providing services to its clients. Sampling of records was conducted in accordance with the statistical guidelines used by the International Organization for Standardization, which required that we review records equal to the square root of the total available records. We believe that the Analyst's assessment and the CRC's review of the Analyst's report provide a reasonable basis for this report and issuance of a Certificate of Registration to the Advisor.

Neither this report nor the Advisor's CEFEX registration constitutes a financial audit of the Advisor or a regulatory or compliance audit of the Advisor's operations, and CEFEX expresses no opinion regarding the completeness or accuracy of the Advisor's financial condition or financial statements or its compliance with applicable legal or ethical requirements with respect to any specific client. Neither this report nor the Advisor's CEFEX registration provides assurance that the Advisor will conform to the Fiduciary Practices or applicable legal or ethical requirements in any specific instance, and CEFEX disclaims any responsibility for such conformance.

In our opinion, based on the assessment referred to above, the Advisor conforms to all Practices and Criteria defined in the Handbook as of **December 5, 2019** in the conduct of its investment advisory business generally and is entitled to receive a CEFEX Fiduciary Certificate of Registration, which shall be valid for a period of 12 months.

CENTRE FOR FIDUCIARY EXCELLENCE  
Pittsburgh, PA