

Altruist Financial Advisors LLC

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1-888-894-8244

http://www.altruistfa.com

February 23, 2025

This Brochure (a.k.a., Form ADV Part 2A) provides information about the qualifications and business practices of Altruist Financial Advisors LLC ["Altruist"]. If you have any questions about the contents of this Brochure, please contact us at 1-888-894-8244 and/or altruistfa@gmail.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Altruist Financial Advisors LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Altruist Financial Advisors LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published "Amendments to Form ADV" which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure, dated 02/23/2025, updates the last update, dated 03/06/2024.

We updated our assets under management.

In the past, we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. In response to new SEC Rules, we will send you a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about significant changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Eric E. Haas, Member at 1-888-894-8244 or altruistfa@gmail.com.

Additional information about Altruist Financial Advisors LLC is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Altruist who are registered, or are required to be registered, as investment adviser representatives of Altruist.

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Item 4 - Advisory **Bus**iness

- A. Altruist is a Limited Liability Company organized in the state of Michigan and has been operating since 2001. It is owned by Eric E. Haas.
- B. Altruist offers one fee-only service: the ALTRUIST Portfolio Management Service.

I. ALTRUIST Portfolio Management Service

The ALTRUIST Portfolio Management Service provides ongoing management of a client's portfolio. This management is based on the methods and principles described broadly in section 8(A).

After working with the client to develop an investing approach amenable to the client's preferences, Altruist drafts a written Investment Policy Statement that the client approves and signs. Each Investment Policy Statement describes a target portfolio asset allocation in which assets are allocated between equity and fixed income investments and among several asset classes. The document also describes the principles and restrictions which will govern our ongoing management.

Once a client has agreed to an Investment Policy Statement, Altruist prepares specific recommendations regarding how to implement the policy. The recommendations will include specific mutual funds and amounts of each recommended transaction.

Upon receiving recommendations, a client can either accept, reject, or modify them. Unless discretionary authority is explicitly authorized in writing, Altruist will never exercise discretionary authority to trade a client's account.

For each asset class, recommended investments will generally be in one or a few no-load mutual funds. To accomplish this, Altruist will generally utilize passively managed (e.g., "index") mutual funds.

Altruist will review each account at least quarterly and, if appropriate, will recommend rebalancing each account periodically to maintain the client's selected strategic asset allocation exposure. Decisions whether to recommend rebalancing a portfolio account may be affected by the transaction costs that may be involved (including taxes). If a client's risk

tolerance, return objectives, or other factors affecting the management of his or her account change, Altruist prepares a revised Investment Policy Statement, which the client generally must approve before changes in the client's target asset allocation are implemented. It is the client's responsibility to communicate to Altruist such changes in their situation.

Generally, Altruist will not accept accounts of less than \$3,000,000, but exceptions may be made on a case-by-case basis.

Altruist provides ongoing Investment Management services to its clients primarily, but not exclusively, on a non-discretionary basis.

C. Altruist tailors its advisory services to the individual needs of clients. This is done during the planning stage, when we analyze a client's unique preferences and needs to synthesize an approach that best meets those needs while conforming with the principles of prudent investing.

Clients may impose restrictions on investing in certain securities or types of securities.

- D. Altruist does NOT participate in wrap fee programs. A "wrap fee program" is an arrangement under which all advice and transactions would be provided for a single fee that is not based on the transactions in a client's account. If we offered it, we believe that this sort of arrangement would amount to a conflict of interest that would not serve our clients well.
- E. Client assets under Management. As of 12/31/2024, Altruist had the following assets under management:

Discretionary: \$72,248,109 Non-Discretionary: \$256,049,327 Total: \$328,297,436

Item 5 – Fees and Compensation

A. Altruist is compensated on a fee-only basis for its services as follows:

I. ALTRUIST Portfolio Management Service

ALTRUIST Portfolio Management Service fees are charged based on a percentage of the value of assets being managed.

For the ALTRUIST Portfolio Management Service, clients pay an annual fee based on percentage of assets under Management as per the fee schedule below. This fee is paid at the end of each quarter, based on the value of the portfolio at the end of the quarter. Fees for the initial and final billing periods will be prorated for the number of days management services were provided during the quarter in question.

Fee Schedule for ALTRUIST Portfolio Management Service

First \$10,000,000	0.235% per year (0.05875% per quarter)
Next \$10,000,000	0.11% per year (0.0275% per quarter)
Next \$30,000,000	0.055% per year (0.01375% per quarter)
Next \$50,000,000	0.03% per year (0.0075% per quarter)
Subsequent amounts	0.02% per year (0.005% per quarter)

Fees are negotiable, based upon portfolio size and other business considerations. **The minimum annual fee is \$30,000** (i.e., \$7,500 per quarter). Generally, Altruist will not accept accounts of less than \$3,000,000, but exceptions may be made on a case-by-case basis.

- B. For the ALTRUIST Portfolio Management Service, fees are withdrawn directly from a client's account. This is done quarterly.
- C. Other fees. ALTRUIST Portfolio Management Service clients may also be subject to brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, transfer taxes, wire transfer and electronic fund transfer fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management and administrative fees, which are disclosed in a fund's prospectus.

Such charges, fees and commissions are exclusive of, and in addition to, Altruist's fee, and Altruist shall not receive any portion of these commissions, fees, and costs (i.e., those that may exist in addition to Altruist's fees).

D. ALTRUIST Portfolio Management Service (i.e., investment advisory) clients pay in arrears (i.e., at the end of each quarter). Clients of that service may terminate their service at any time. If ALTRUIST Portfolio Management Service clients are not satisfied with their service, and they request a refund, they will receive a complete

refund of Altruist fees paid within the previous six months.

E. <u>No</u> Altruist employees or officers accept compensation of any kind for sale of securities or any other investment products (i.e., <u>no</u> commissions). Altruist considers that sort of compensation to carry an unacceptable conflict of interest.

Item 12 further describes the factors that Altruist considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

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

Altruist does <u>not</u> charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 - Types of Clients

Altruist provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, private investment funds, trust programs, and other U.S. and international institutions.

Generally, Altruist will not accept accounts of less than \$3,000,000, but exceptions may be made on a case-by-case basis.

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

A. Investing in securities involves risk of loss that clients should be prepared to bear.

Altruist will invest your assets using a "strategic asset allocation" approach. This is based on the following principles:¹

- Markets are efficient. Markets work and, for investment purposes, assets are fairly priced.
- Risk and return are related. Priced risk factors determine expected return.
- Diversification is key. Diversification is the antidote to uncertainty. Concentrated investments add risk with no additional expected return.
- Structure explains performance. Asset allocation principally determines the results in a broadly diversified portfolio

¹ Taken from "Global Investment Solutions," Dimensional Fund Advisors brochure, November 30 2002.

Altruist will not engage in forecasting of any kind—we are not aware of any forecasting methodology which can be expected to be consistently accurate. Altruist will not engage in market timing (a.k.a., "tactical asset allocation") because it has been shown not to work. Altruist will not engage in "stock picking" because there is virtually no credible evidence that active management can consistently outperform a similar (but lower cost) passively managed portfolio. Our investing philosophy embraces the tenets of Modern Portfolio Theory, the Efficient Markets Hypothesis, and the Fama/French 5-factor Model.

We will employ a primarily passive investing strategy because its lower cost is likely to result in outperformance, on average and in the long run, over a more costly, but otherwise similar, active management strategy.

Our strategy will lead to long-term, risk-adjusted, after-tax returns which are commensurate with the level of risk you've chosen to expose yourself to.

Altruist's primary job is to prudently expose you to the asset class risk factors to the extent that you have chosen and to do this in a low-cost, prudently diversified, tax efficient, cost-effective fashion, given all the constraints, both explicit and implicit, that we are subject to. Thus, an appropriate manner of judging us is to assess:

- how closely we maintain your asset allocation to the target allocation (given external constraints),
- how successful we are at minimizing investing fees/expenses, (given available investing vehicles), and
- how successful we are at prudently minimizing your tax burden, given our understanding of the nature of the taxes you are subject to.²

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² Note that because our services are almost exclusively non-discretionary, these factors refer to our advice—not necessarily the actual performance of your portfolio. This distinction is necessary because you may not follow our advice. We, however, are only responsible for our advice, not whether or not you choose to accept it. The value of our advice must be judged based on what was known when the advice was given, not in hindsite.

- B. The primary risk Altruist clients are subject to is market risk. In other words, their portfolios will perform as well as the markets cause their portfolios to perform—sometimes this will be quite good and sometimes quite poorly, but always consistent with the level of risk which the client chooses to expose themselves to.
- C. Altruist clients are primarily invested in open-end Mutual Funds and Exchange-Traded Funds. Again, these investments primarily expose the client to market risk.

Item 9 – Disciplinary **Info**rmation

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Altruist or the integrity of Altruist's management. Altruist has <u>no</u> information applicable to this item (i.e., there are <u>no</u> relevant legal or disciplinary events to disclose).

Item 10 - Other Financial Industry Activities and Affiliations

- A. Altruist (and its management persons) is <u>not</u> registered, nor has an application pending to register, as a broker-dealer or a registered representative of a broker dealer.
- B. Altruist (and its management persons) is <u>not</u> registered, nor has an application to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.
- C. Altruist is one of several fee-only investment advisers who is authorized by Dimensional Fund Advisors ("DFA", a mutual fund company) and Bridgeway Funds to allow its clients to invest in DFA funds and certain Bridgeway funds which are generally not available to the retail public except through approved fee-only advisers. Altruist receives no compensation of any kind from DFA or Bridgeway. Altruist does not consider this arrangement to constitute a conflict of interest. In fact, it allows Altruist to make available to its clients an enhanced selection of high-quality investing vehicles.

Altruist has <u>no</u> other business relationship or arrangement that is material to its advisor business or to its clients (or any of its management persons) with any related entity listed below:

- Broker-dealer, municipal securities dealer, or government securities dealer or broker.
- Investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund", and offshore fund.
- Other investment adviser or financial planner.
- Futures commission merchant, commodity pool operator, or commodity trading advisor.
- Banking or thrift institution.
- Accountant or accounting firm.
- Lawyer or law firm.
- Insurance company or agency.

- Pension consultant.
- Real estate broker or dealer.
- Sponsor or syndicator of limited partnerships.
- D. Altruist does <u>not</u> generally recommend or select other investment advisers for its clients and does <u>not</u> receive compensation directly or indirectly from any such advisers that creates a material conflict of interest. Altruist does <u>not</u> have any other business relationships with other advisers that create a material conflict of interest.

Item 11 - Code of Ethics

A. Altruist has a Code of Ethics and Personal Trading Policy. Clients or prospective clients may request a copy of that policy by submitting such a request in writing.

Actually, Altruist has two "Codes of Ethics"—one intended for the public and one intended to meet the requirements of Rule 204A-1 under the Investment Advisers Act of 1940.

The Code of Ethics intended for public consumption is posted on our website. It acknowledges a fiduciary responsibility towards our clients founded on the virtues of integrity, honesty, objectivity, and competence.

The Code of Ethics intended to meet the requirements of Rule 240A-1 under the Investment Advisers Act of 1940 is included in our internal Compliance Manual and is available upon request. In short, it requires Altruist employees to:

- Behave as a fiduciary towards clients
- Avoid conflicts of interest
- Protect client personal information
- B. Altruist does <u>not</u> recommend to clients—or buy or sell for client accounts securities in which it or a related person has material financial interest.
- C. Altruist's investment recommendations are principally mutual funds and ETFs. Altruist members, officers, and employees may or may not also own—and make further investments in—those same mutual funds and ETFs, but Altruist does <u>not</u> consider this to be a conflict of interest.

D. Altruist members, officers, and employees may or may not buy or sell the abovementioned mutual funds and ETFs at or about the same time that it recommends them to clients, but Altruist does <u>not</u> consider this to be a conflict of interest.

Item 12 - Brokerage Practices

A. Altruist does <u>not</u> select brokers for clients. However, for clients who require the services of a broker, Altruist may occasionally suggest one. Altruist considers convenience and low fees/commissions as the principal factors in selecting brokers for recommendation. Altruist is <u>not</u> affiliated in any way with any broker/dealers and does not receive commissions of any sort as a result of a client's investment or divestment decisions.

Altruist recommends to its ALTRUIST Portfolio Management Service clients a financial institution both to hold their funds and securities as custodian and to effect transactions in securities held in their accounts. That institution may be a financial institution such as a bank or a trust company. Factors Altruist may consider in making such a recommendation include the selection of mutual funds that may be purchased through the custodian, quality of execution services, levels of transaction and other custodial charges, quality of reporting services to Altruist and its clients, and stability and financial soundness of the institution.

- I. Altruist does <u>not</u> receive research or other soft dollar benefits other than execution from any broker-dealer or third party in connection with client security transactions.
- II. Altruist does <u>not</u> receive client referrals from any broker-dealer or similar financial institution.
- III. Altruist does <u>not</u> recommend, request, or require that clients direct it to execute transactions through a specified broker-dealer.
- B. Altruist generally does <u>not</u> aggregate the purchase or sale of securities for various client accounts. There is a theoretical possibility that in some instances, such aggregation may result in lower brokerage costs. For example, if many smaller trades could be aggregated into a single dramatically larger trade, efficiencies of scale may result for the transaction. However, since our clients' portfolios are generally managed in a completely custom fashion, and because we have a relatively

small number of clients, material opportunities for exploiting those theoretical efficiencies are rare.

Item 13 – Review of Accounts

- A. Although the exact review process depends upon the nature and terms of the specific engagement, the following description of the review process generally applies:
 - I. For the ALTRUIST Portfolio Management Service, accounts are reviewed by an Altruist investment advisor at least quarterly.
- B. The triggering factors for other than periodic reviews are:
 - I. For the ALTRUIST Portfolio Management Service, accounts may be reviewed more frequently as a result of changes in client objectives or significant market movements. It is the responsibility of the client to notify Altruist of changes in their risk tolerance, return objectives, or other factors affecting the management of their account.
- C. For ALTRUIST Portfolio Management Service clients, written Quarterly Reports are prepared for each client. These reports review asset allocation, as well as information on selected recommended investment vehicles. Clients also receive regular account statements from the custodian(s) holding the fund shares and executing the purchases and sales.

Item 14 - Client Referrals and Other Compensation

- A. Altruist receives <u>no</u> money or other economic benefits from anybody except clients—as a result of providing investment advice or other advisory services to its clients.
- B. Altruist (or a related person) does <u>not</u> directly or indirectly compensate any person for client referrals.

Item 15 - Custody

Altruist will <u>not</u> maintain custody of clients' funds or securities (except to the strictly limited extent of perhaps being able to withdraw payment of our fees out of their accounts—and then only if the client had approved in advance for us to do so).

A. Clients should carefully review the account statements that they receive from custodians of their assets.

Item 16 - Frade Errors

It is Altruist's policy to ensure clients are made whole following a trade error. In other words, we will try to ensure that the client is restored, as closely as feasible, to the position that they would have been in had the error not occurred. Specifically, when Altruist causes a trade error to occur in a client account that results in a loss, Altruist will reimburse the client. If the trade error results in a gain, Altruist will keep that gain.

Item 17 – Investment Discretion

Altruist will generally not have (or exercise) discretionary authority over clients' accounts. Discretionary authority means the authority to buy and sell securities in your account without getting your explicit permission first.

In limited cases, certain clients may, however, contract with Altruist to manage their accounts in a discretionary fashion.

For both non-discretionary and discretionary accounts, Altruist observes the investment policies, limitations and restrictions of the clients for which it advises.

Investment guidelines and restrictions must be provided to Altruist in writing. This is generally done in the Investment Policy Statement.

If discretionary authority is being granted, it is generally explicitly authorized in a written contract with Altruist.

Item 18 - Voting Client Securities

- A. If a client authorizes us to do so, Altruist will vote proxies in accordance with Altruist's Proxy Voting Policy. Clients may view Altruist's Proxy Voting Policy on its web site or may request that a copy be delivered electronically to them by E-Mail. Clients may request that Altruist provide a record of how their proxies were voted by requesting said record in writing.
 - Altruist strives to vote all proxies in the best economic interests of its clients. The decision of how to vote follows the same criteria Altruist uses in managing client accounts—to vote for proposals in such a manner that, in Altruist's opinion, will enhance shareholder value.
- B. If a client has delegated authority to vote their shares and they desire to direct us to vote their shares in a specific manner in a particular solicitation, they need to express that desire to us in writing in a timely fashion (i.e., before we actually vote the shares).
- C. There is a small possibility that we might occasionally become aware of a material conflict of interest which might reasonably bring into question our objectivity in voting a client's proxy. In such a case, we will endeavor to inform any affected clients of that potential conflict in advance and mutually agree on an acceptable manner of handling the potential conflict. We will not vote a proxy where we are aware of a material conflict of interest unless the client has approved our actions in advance, after being informed of the potential conflict.

Item 19 - Financial Information

- A. Altruist does <u>not</u> require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance for its investment advisory services.
- B. Altruist has <u>no</u> financial commitment or condition that impairs its ability to meet contractual and fiduciary commitments to clients.
- C. Altruist has <u>never</u> been the subject of a bankruptcy proceeding.

Item 20 - Requirements for State-Registered Advisers

A. Eric E. Haas is the Founding Member of Altruist. Eric serves as Chief Compliance Officer, Chief Investment Officer, Chief Executive Officer, etc.

Born: 1964

Education:

Grand Rapids Community College, AGS, 2023
Duke University, MBA, 1993
Duke University, MS(Electrical Engineering), 1993
University of Michigan, BSE(Computer Engineering), 1985
University of Michigan, BSE(Electrical Engineering), 1985

Business Background:

Member, Altruist Financial Advisors LLC (1/2001-present); Management/Technology Consultant, PricewaterhouseCoopers LLP (2/1994-10/1999);

Nuclear Submarine Officer, United States Navy (5/1985-5/1990).

- B. Altruist is <u>not</u> engaged in any business other than providing Financial Planning and Investment Advisory services.
- C. Altruist (and its supervised persons) is <u>not</u> compensated for advisory services with performance-based fees.
- D. Altruist has <u>never</u> been involved in an arbitration claim or legal proceeding of any kind alleging misconduct of any kind.
- E. Altruist has <u>no</u> relationship or arrangement with issuers of securities not listed in item 10.C. of Part 2A.

This brochure supplement provides information about Eric E. Haas that supplements the Altruist Financial Advisors LLC brochure. You should have received a copy of that brochure. Please contact Eric E. Haas if you did not receive Altruist's brochure or if you have any questions about the contents of this supplement.

Additional information about Eric E. Haas is available on the SEC's website at www.adviserinfo.sec.gov

Brochure Supplement Item 1 - Cover Page

Eric E. Haas Altruist Financial Advisors LLC 3754 65th St Holland, MI 49423-9739 1-888-894-8244 February 23, 2025

This Brochure Supplement (a.k.a., Form ADV Part 2B) tells you about the qualifications, disciplinary information, and conflicts of interest applicable to Eric E. Haas's investment advisory activities with Altruist Financial Advisors LLC ["Altruist"]. If you have any questions about the contents of this Brochure Supplement, please contact us at 1-888-894-8244 and/or altruistfa@gmail.com. The information in this Brochure Supplement has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Eric E. Haas is an Investment Adviser Representative registered with the State of Michigan. Registration of an Investment Adviser Representative requires passing the NASAA Uniform Investment Adviser Law Examination (a.k.a., "Series 65").

Brochure Supplement Item 2 - Educational Background and Business Experience

Eric E. Haas is the Founding Member of Altruist. He serves as Chief Compliance Officer, Chief Investment Officer, Chief Executive Officer, etc.

Born: 1964

Education:

Grand Rapids Community College, AGS, 2023
Duke University, MBA, 1993
Duke University, MS(Electrical Engineering), 1993
University of Michigan, BSE(Computer Engineering), 1985
University of Michigan, BSE(Electrical Engineering), 1985

Business Background:

Member, Altruist Financial Advisors LLC (1/2001-present); Management/Technology Consultant, PricewaterhouseCoopers LLP (2/1994-10/1999), Nuclear Submarine Officer, United States Navy (5/1985-5/1990).

Brochure Supplement Item 3 - Disciplinary Information

There are <u>no</u> legal or disciplinary events material to a client's or prospective client's evaluation of Eric E. Haas.

Brochure Supplement Item 4 - Other Business Activities

- A. Eric E. Haas is <u>not</u> actively engaged in any investment-related business or occupation other than his work with Altruist Financial Advisors LLC.
- B. Eric E. Haas is <u>not</u> engaged in any other business or occupation for compensation where the other occupation provides a substantial amount of his income.

Brochure Supplement Item 5 - Additional Compensation

Nobody who is not a client provides any economic benefit to Eric E. Haas for providing advisory services.

Brochure Supplement Item 6 - Supervision

As Altruist's sole Member, Chief Compliance Officer, Chief Investment Officer and sole employee, Eric E. Haas supervises himself. Eric's supervisor's contact information is as follows:

Eric E. Haas, Member

1-888-894-8244

Brochure Supplement Item 7 - Requirements for State-Registered Advisers

- A. In addition to the events listed in item 3 of Part 2B, Eric E. Haas has <u>not</u> been involved in the following events:
 - 1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
 - 2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;

- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.
- B. Eric E. Haas has <u>not</u> been the subject of a bankruptcy petition.