

Introduction

Dolan McEniry Capital management, LLC (“Dolan McEniry”) is registered with the Securities and Exchange Commission (SEC) as an investment adviser.

Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers, and investing.

Relationships and Services

What investment services and advice can you provide me?

Dolan McEniry offers investment advisory services to retail investors, including, but not limited to, individuals, family foundations, trusts and clients in wrap fee programs sponsored by a bank or broker-dealer. We are an intermediate duration fixed income value investor with a specialty in corporate bonds. Our core competence is credit analysis, and our credit analysis is focused on the analysis of free cash flow. We strive to add value to our client portfolios through the identification and selection of bonds we believe are undervalued.

Monitoring

Dolan McEniry is diligent in maintaining and monitoring account compliance in line with the designated strategy or mutually agreed upon investment policy statement. Accounts are reviewed regularly by our portfolio management team and portfolio compliance matters are reviewed during our portfolio and trading review meeting.

Investment Authority

Dolan McEniry maintains discretionary authority over client accounts, which means that we can buy and sell investments on your behalf without seeking permission on a trade by trade basis. We strive to manage all accounts within each strategy as closely as possible while adhering to individual investment policies and/or restrictions. Thus, while we discourage restrictions or tailoring our investment management strategy to any one client, we permit reasonable restrictions on investing in certain securities or industry sectors, as mutually agreed upon with you.

Limited Investment Offering

Dolan McEniry offers the following separately managed account strategies: Core Plus, Credit, Investment Grade, High Yield, Short Duration. Additional information regarding our strategies can be found at [DolanMcEniry.com/Products](https://www.dolanmceniry.com/products).

Account Minimums and Other Requirements

Dolan McEniry’s separately managed account minimum account size is \$500,000 for the Core Plus, Credit, Investment Grade and Short Duration strategies and \$750,000 for the High Yield strategy. Account minimums may be subject to negotiation.

Additional information

More information about Dolan McEniry services is available on Part 2 of our Form ADV, which is available at [DolanMcEniry.com/About](https://www.dolanmceniry.com/about).

Conversation Starters. Ask your financial professional —

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?*

Fees, Costs, Conflicts, and Standard of Conduct

A. What fees will I pay?

Dolan McEniry charges you an investment management fee that is based on the value of your assets under management. The standard separately managed account fee is 0.40% (40bps) of assets under management for the Core Plus, Credit, Investment Grade, and Short Duration strategies. The standard fee for our High Yield strategy is 0.60% (60bps).

In cases where Dolan McEniry is responsible for billing, your account is typically billed quarterly in arrears and pro-rated for partial periods, contributions, and withdrawals. Management fees owed to Dolan McEniry will either be deducted directly from your account, deducted from another designated account of your choosing, or invoiced to you. Our fees generally increase as your account grows due to positive performance or additional deposits, so we have an incentive to encourage you to increase the amount of assets in the accounts that are under our management. Additional information about our firm’s fees are included in Item 5 of Part 2 of Form ADV, available at [DolanMcEniry.com/About](https://www.dolanmceniry.com/about)

In addition to our investment management fee, you may bear transaction fees when we buy or sell investments. You may also pay fees, as agreed upon, to the broker-dealer or bank that maintains each account (called “custody” fees).

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Conversation Starter. Ask your financial professional —

- *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

B. What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide to you. Here are some examples to help you understand what this means.

- *We manage accounts for multiple clients, and we allocate our time based on each client’s needs. Our firm earns more as we expand our client base and grow our assets under management, and we seek to balance our staffing with the individualized needs of each client.*
- *We provide discretionary and/or non-discretionary account management for each of our firm’s Managing Members and their family members (“proprietary accounts”). Proprietary accounts may be included in a block order along with client trades when we determine the proprietary accounts are not unfairly advantaged by trading along with client accounts.*

Conversation Starter. Ask your financial professional —

- *How might your conflicts of interest affect me, and how will you address them?*

More Additional information about conflicts of interest between Dolan McEniry and its clients is available on Part 2 of our Form ADV, which is available at [DolanMcEniry.com/About](https://www.dolanmceniry.com/About).

How do your financial professionals make money?

Dolan McEniry’s financial professionals are compensated with a salary based on employee experience and performance in their respective jobs and contributions to the success of our team. Compensation levels have generally tracked with the growth of the firm’s assets under management. Work ethic, teamwork, attitude, and commitment to our firm are the important criteria in setting individual compensation levels.

Disciplinary History

Do your financial professionals have legal or disciplinary history?

Yes No

Visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

Conversation Starter. Ask your financial professional —

- *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Additional Information

Additional information about our services can be found at [DolanMcEniry.com/About](https://www.dolanmceniry.com/About). If you have any questions about the contents of this brochure or would like to request a copy of this relationship summary, please contact our client service team by phone at (312) 345-4800 or by email at clientservice@dolanmceniry.com.

Conversation Starter. Ask your financial professional —

- *Who is my primary contact person? Is he or she a representative of an investment-adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*



Dolan McEniry Capital Management, LLC

Form ADV
Part 2A

120 North LaSalle Street
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Chicago, IL 60602

March 10, 2022

Please contact Daniel D. Dolan, Jr. or Katheryn G. Calderon
(312) 345-4800 | clientservice@dolanmceniry.com | www.dolanmceniry.com

This brochure provides information about the qualifications and business practices of Dolan McEniry Capital Management, LLC (“Dolan McEniry”). If you have any questions about the contents of this brochure, please contact Dolan McEniry at 312-345-4800 or clientservice@dolanmceniry.com. 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 Dolan McEniry Capital Management, LLC also is available on the SEC’s website at www.adviserinfo.sec.gov.

Dolan McEniry Capital Management, LLC is an SEC registered investment adviser. Registration of an adviser with the SEC does not imply a certain level of skill or training.

Item 2 Material Changes

The following material changes have been incorporated into this brochure since the last annual amendment filed March 5th, 2021, including updates and enhancements to:

- Disclosures in Item 8 (Methods of Analysis, Investment Strategies and Risk of Loss), including the addition of a General Economic and Market Conditions risk disclosures;
- Affiliates in Item 10 (Other Financial Industry Activities and Affiliations);
- Personal trading disclosures in Item 11 (Code of Ethics, Participation or Interests in Client Transactions and Personal Trading);
- Account review practices in Item 13 (Account Reviews).

In addition, we have made clarifying updates throughout this brochure. We recommend that you review this brochure in its entirety.

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Item 4 Advisory Business

Dolan McEnery is a fixed income value manager located in Chicago, Illinois. Dolan McEnery (originally Dolan Capital Management) was founded in July 1997 by Daniel D. Dolan, Jr. Roger S. McEnery joined the firm as a Managing Member in April 2001. The firm name was changed to Dolan McEnery Capital Management, LLC in the first quarter of 2003. Until November 4, 2016, Mr. Dolan and Mr. McEnery (“Managing Members”) each owned 50 percent of the firm. Effective November 4, 2016, iM Square Holding 2 LLC purchased a non-controlling interest in Dolan McEnery. iM Square Holding 2 LLC is a wholly owned subsidiary of iM Square Partners Holding, itself a wholly owned subsidiary of iM Square SAS, a Paris-based investment and development platform dedicated to the asset management business, which is owned by Amundi Ventures, Legendre Holdings 36, a third non-controlling party and managers. Amundi Ventures, a holding company, is a wholly owned subsidiary of Amundi Asset Management, itself a wholly owned subsidiary of Amundi SA, a European asset management company. Amundi SA is owned by Credit Agricole SA, public (free float) and employees. Credit Agricole SA is owned by SAS rue de la Boétie, public (free float) and employees. Legendre Holdings 36, a holding company, is majority-owned (>75%) by Eurazeo SE, a European investment firm.

As of December 31, 2021, Dolan McEnery had \$7,666,870,007 in discretionary regulatory assets under management.

Dolan McEnery is an intermediate duration fixed income value investor with a specialty in corporate bonds. Dolan McEnery’s core competence is credit analysis, and its credit analysis is focused on the analysis of free cash flow. Dolan McEnery offers the following strategies:

Dolan McEnery Core Plus – this strategy is a fixed income product benchmarked against the Bloomberg U.S. Aggregate Bond Index or the Bloomberg U.S. Intermediate Credit Index. Dolan McEnery Core Plus utilizes U.S. corporate investment grade, high yield and U.S. Treasury securities.

Dolan McEnery Credit – this strategy is a fixed income product benchmarked against the Bloomberg U.S. Intermediate Credit Index or the Bloomberg U.S. Intermediate Corporate Bond Index. Dolan McEnery Credit utilizes U.S. corporate investment grade, high yield and U.S. Treasury securities.

Dolan McEnery Investment Grade – this strategy is a fixed income product benchmarked against the Bloomberg U.S. Intermediate Credit Index or Bloomberg U.S. Aggregate Bond Index. Dolan McEnery Investment Grade utilizes entirely U.S. corporate investment bonds and U.S. Treasury securities.

Dolan McEnery High Yield – this strategy is a fixed income product benchmarked against the Bloomberg U.S. Corporate High Yield Ba/B Bond Index. Dolan McEnery High Yield utilizes entirely U.S. corporate high yield bonds; however, the strategy will take advantage of what the firm believes to be attractively priced U.S. corporate investment grade bonds when appropriate.

Dolan McEnery Short Duration – this strategy is a fixed income product benchmarked against the Bloomberg U.S. Credit 1-5 Year Index. Dolan McEnery Short Duration utilizes U.S. corporate investment grade, high yield and U.S. Treasury securities. Accounts in this strategy typically have an average duration target of 3 years or less.

Dolan McEnery provides discretionary investment management services to foundations, endowments, public pensions, Taft-Hartley accounts, corporations, sovereign nations, high net worth individuals,

charitable organizations, wrap clients and other pooled investment vehicles (e.g. UCITS, registered investment companies). Dolan McEniry also provides sub-advisory services to private funds. Dolan McEniry strives to manage all accounts within each strategy as closely as possible while adhering to individual investment policies. Thus, while Dolan McEniry discourages restrictions or tailoring its investment management strategy to any one client, Dolan McEniry does permit reasonable restrictions on investing in certain securities or industry sectors, as mutually agreed.

Dolan McEniry provides investment management services to clients in wrap fee programs sponsored by a bank or broker-dealer (“BD”). There is no difference in Dolan McEniry’s investment management strategy or philosophy between wrap fee accounts and its other clients. In a wrap fee program, the sponsor charges its clients a bundled asset-based fee for an array of investment services, such as brokerage, advisory, research, custody and management services. The sponsor is responsible for paying a portion of the bundled fee to Dolan McEniry for its investment management services. Dolan McEniry invoices clients directly in certain wrap account programs as agreed upon by Dolan McEniry and wrap program sponsors.

Item 5 Fees and Compensation

General Fee Information

In cases where Dolan McEniry is responsible for billing the client, client accounts are typically billed quarterly in arrears and pro-rated for partial periods, contributions and withdrawals. At the client’s direction, Dolan McEniry either deducts the fees directly from the client’s account or bills the client the fees owed. In most cases, Dolan McEniry sends the client an invoice showing the amount of the fees, the net asset value of client’s assets on which the fees are based, and the specific manner in which the fees were calculated. Fees may be negotiable based on account size and other considerations. Fees may be waived on accounts of the firm’s Managing Members and their family members (“proprietary accounts”) and certain other accounts where a Managing Member provides pro-bono services.

In a wrap fee program, the sponsor charges its clients a bundled asset-based fee for a package of investment services, such as brokerage, advisory, research, custody and management services. The sponsor is responsible for paying Dolan McEniry a portion of the bundled fee for its investment management services. The fee Dolan McEniry earns is negotiated separately with each sponsor and will vary from program to program. Further, the fees clients pay to the sponsor vary and Dolan McEniry does not have any control or influence over the fees charged to clients by the sponsor.

Clients may incur separate custodian, brokerage and transaction costs. Custodian fees are negotiated by the clients and their selected custodian(s). Please see Item 12 for information about Dolan McEniry’s brokerage practices.

Fee Schedule

Dolan McEniry’s standard fee is up to 0.40% (40bps) of assets under management for the Core Plus, Credit, Investment Grade, and Short Duration strategies. The standard fee for Dolan McEniry’s High Yield strategy is up to 0.60% (60bps) of assets under management. Fees may be negotiable based on account size and other considerations and may differ from the standard fee.

Fees for managing wrap fee accounts are charged to the client by the wrap program sponsor as part of a bundled fee. Dolan McEniry receives a portion of the bundled fee for investment management services directly from the wrap program sponsor. Fees are based on a percentage of the account’s

market value and may differ from Dolan McEniry's standard fee.

Fees for providing management services for pooled-investment vehicles, such as UCITS funds or registered investment companies, are charged to the client by the vehicle's administrator and are part of a bundled fee. Dolan McEniry directly or indirectly receives a portion of the bundled fee for investment management services. Fees are based on a percentage of the pooled-investment vehicle's market value and may differ from Dolan McEniry's standard fee. Clients invested in pooled-investment vehicles should refer to the applicable fund's governing documents for a description of the fees and expenses of the fund.

Account Valuation Practices

Dolan McEniry uses account market values to calculate investment performance and client fees, so it is important that these values are as accurate as possible. Dolan McEniry's account valuation practices are described below.

Dolan McEniry utilizes pricing information provided by ICE Data Services ("Primary Pricing Source") to value client portfolios on month-end. Intramonth and in instances where the Primary Pricing Source does not provide a price on month end, Dolan McEniry will attempt to obtain a price directly from an Advent Custodial Data ("ACD") interface where the security is held. Should the ACD interfaces to which Dolan McEniry subscribes not supply a price or if Dolan McEniry determines any price received through the Primary Pricing Source or otherwise is not reflective of the market value, Dolan McEniry will establish a fair value for the security. In this case, fair value prices are determined by at least two members of Dolan McEniry's portfolio management team, one of which must be a Managing Member of the firm.

There are inherent conflicts of interest when Dolan McEniry values client accounts, as higher security prices increase market values, thereby enhancing performance results and increasing fees. In addition, because clients pay different fees based on differing fee schedules or the size of the account, Dolan McEniry has an incentive to favor those accounts where it earns the highest fees. Dolan McEniry maintains investment, trade allocation, and account valuation (including fair valuation) policies and procedures to address such conflicts of interest.

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

Dolan McEniry is not currently engaged in any performance-based fee arrangements but is open to the discussion.

Item 7 Types of Clients

Dolan McEniry manages assets for foundations, endowments, public pensions, Taft-Hartley accounts, corporations, sovereign nations, high net worth individuals, charitable organizations, wrap clients and pooled-investment vehicles (e.g. UCITS, registered investment companies). Dolan McEniry also provides sub-advisory services to private funds.

Dolan McEniry provides discretionary account management for proprietary accounts, as defined above in Item 5. Proprietary accounts may be included in a block order along with client trades when Dolan McEniry determines the proprietary accounts are not unfairly advantaged by trading along with client accounts.

Please see Item 12 for a discussion of Dolan McEniry's trading practices.

Dolan McEniry's minimum account size is \$500,000 for the Core Plus, Credit, Short Duration, and Investment Grade strategies and \$750,000 for the High Yield strategy. Dolan McEniry's participation in wrap fee or similar programs may require acceptance of account sizes less than the generally preferred minimum. Account minimums may be subject to negotiation.

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

Dolan McEniry is an intermediate duration fixed income value investor with a specialty in corporate bonds. Dolan McEniry utilizes "bottoms up" investment analysis which focuses on credit analysis and strives to add value to client portfolios through the identification and selection of undervalued bonds. Some of the major tenets of Dolan McEniry's philosophy include doing its own research, remaining within its "circle of competence", having a lender's mentality versus a trader's, remaining skeptical of credit ratings, being contrarian investors when there is safety in the cash flows, and believing that "no" is a great investment decision in the fixed income arena when there is any doubt whatsoever.

Dolan McEniry credit research is conducted in house, and the firm does not rely on credit ratings issued by the rating agencies. Instead, Dolan McEniry reads and analyzes companies' financial statements (filed with the SEC) and creates ten-year financial models for each company in its coverage universe. These models allow the firm to assess trends in revenue, margins, earnings, cash earnings, investments in working capital and fixed assets, debt levels and cash balances, and other items. The focus of its credit research is to ensure that only bonds issued by companies with wide margins of safety in their cash flows are purchased.

The investment process at Dolan McEniry is designed to identify undervalued corporate bonds – those that trade at wide spreads to U.S. Treasury securities yet are issued by companies with what Dolan McEniry considers to be safe cash flows. Dolan McEniry ranks the securities in its coverage universe with equal weighting given to risk (cash flow coverage of interest) and return (spread to Treasuries). The ranking process identifies what the firm deems to be the most undervalued bonds and is a consideration in the construction of its model portfolios. Client portfolios are constructed using the models.

Dolan McEniry manages the following five investment strategies:

Dolan McEniry Core Plus – this strategy is a fixed income product benchmarked against the Bloomberg U.S. Aggregate Bond Index or the Bloomberg U.S. Intermediate Credit Index. Dolan McEniry Core Plus utilizes U.S. corporate investment grade, high yield and U.S. Treasury securities.

Dolan McEniry Credit – this strategy is a fixed income product benchmarked against the Bloomberg U.S. Intermediate Credit Index or the Bloomberg U.S. Intermediate Corporate Bond Index. Dolan McEniry Credit utilizes U.S. corporate investment grade, high yield and U.S. Treasury securities

Dolan McEniry Investment Grade – this strategy is a fixed income product benchmarked against the Bloomberg U.S. Intermediate Credit Index or Bloomberg U.S. Aggregate Bond Index. Dolan McEniry Investment Grade utilizes entirely U.S. corporate investment bonds and U.S. Treasury securities.

Dolan McEniry High Yield – this strategy is a fixed income product benchmarked against the Bloomberg U.S. Corporate High Yield Ba/B Bond Index. Dolan McEniry High Yield utilizes entirely

U.S. corporate high yield bonds; however, the strategy will take advantage of what the firm believes to be attractively priced U.S. corporate investment grade bonds when appropriate.

Dolan McEnery Short Duration – this strategy is a fixed income product benchmarked against the Bloomberg U.S. Credit 1-5 Year Index. Dolan McEnery Short Duration utilizes U.S. corporate investment grade, high yield and U.S. Treasury securities. Accounts in this strategy typically have an average duration target of 3 years or less.

Investment Risk

Dolan McEnery does not offer any products or services that guarantee rates of return on investments for any time period to any client. Investing is speculative and involves risk, including the possible loss of principal. Dolan McEnery products should be considered based on the suitability of the strategy in relation to return objectives, risk tolerances, and other investments. Fixed income investors should be aware that the purchase of a bond essentially is a contract between the investor and the issuer of the bond. The investor is to receive a fixed amount of interest income annually and their principal at maturity. The greatest risk to fulfillment of this “contract” is if an issuer defaults. Fixed income investors should be aware that changes in interest rates will affect the price of fixed income securities and the valuation of client portfolios. High yield securities are rated lower than investment grade securities because there is a greater risk the issuer will default and not be able to make interest and principal payments. Clients should expect portfolio valuations to fluctuate over time and for those clients invested in high yield securities, the price volatility may be greater.

General Economic and Market Conditions Risk

The success of Dolan McEnery’s investment strategies will be affected by general economic and market conditions, including but not limited to interest rates, inflation rates, economic uncertainty, availability of credit, credit defaults, changes in laws (including laws relating to taxation of the clients’ investments), trade barriers, currency exchange controls, energy prices, commodity prices, pandemics, national and international political circumstances (including government intervention in financial markets, wars, terrorist acts or security operations), natural disasters, and coordinated investor actions (e.g., rise of user boards influence on specific securities). These factors generally affect the level and volatility of securities prices and the liquidity of the clients’ investments. The value of the clients’ investments may go up or down, sometimes dramatically and unpredictably, based on these factors.

Cybersecurity Risk

Dolan McEnery relies on information technology and electronic communications to conduct business, which subject Dolan McEnery and its clients to the risk of cyber incidents. While Dolan McEnery has controls it believes are reasonably designed to protect against cyber incidents resulting in unauthorized access to confidential information or business disruptions, not all cyber incidents are preventable. Should a cyber incident occur, it would likely have a negative impact on Dolan McEnery and its clients.

Item 9 Disciplinary Information

Dolan McEnery has no disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

As noted in Item 4, Dolan McEnery is owned in part by iM Square Holding 2 LLC, a wholly owned

subsidiary of iM Square SAS, a Paris-based investment and development platform dedicated to the asset management business. iM Square SAS owns iM Global Partner SAS, the asset management and distribution arm of the iM Square investment platform, who is the sponsor of a UCITS sub-managed by Dolan McEniry. This creates an inherent conflict of interest for Dolan McEniry to favor the UCITS over other client accounts, due to an affiliate's sponsorship of the UCITS. iM Square SAS also owns iM Global Partner US LLC, a holding company, who owns iM Global Partner Fund Management, LLC. iM Global Partner Fund Management, LLC is an SEC-registered investment adviser, who is the advisor of a registered investment company sub-advised by Dolan McEniry and solicits clients and investors for Dolan McEniry. This creates an inherent conflict of interest for Dolan McEniry to favor the investment company and/or clients referred to Dolan McEniry by iM Global Partner Fund Management, LLC over other client accounts. Dolan McEniry maintains investment and trade allocation policies and procedures to address such conflicts of interest.

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

Standards of Conduct

Dolan McEniry maintains a Code of Ethics ("Code") which applies to all officers, directors, Managing Members and employees (collectively "Supervised Persons") of Dolan McEniry. As a fiduciary, Dolan McEniry has a duty of utmost good faith to act solely in the best interests of each of its clients. This fiduciary duty compels all Supervised Persons to act with the utmost integrity in all dealings. In connection with these expectations, the firm has established core principles of conduct for its Supervised Persons. Further, Dolan McEniry expects its Supervised Persons to avoid potential conflicts of interest or even the appearance of such conflicts.

Dolan McEniry's Code outlines the standards of conduct expected of its Supervised Persons and includes limitations on personal trading, giving and accepting gifts, serving as a director or trustee for an external organization, and engaging in outside business activities. In addition, Supervised Persons are prohibited from using inside information to trade in personal accounts or on behalf of the firm's clients including trading on nonpublic information related to any strategy we manage. Dolan McEniry also maintains physical and electronic safeguards to protect nonpublic client information while in its possession and upon destruction.

Supervised Persons are required to report promptly any violation of the Code (including the discovery of any violation or suspected violation committed by another Supervised Person) to the firm's Chief Compliance Officer ("CCO").

Personal Trading

Dolan McEniry requires Access Persons, as defined in the Code, to pre-clear certain personal securities transactions with the CCO. In addition, the Code requires all Access Persons to submit personal security holdings reports to the CCO initially upon employment and on an annual basis thereafter. Finally, all Access Persons are required to report personal transactions to the CCO on a quarterly basis. The CCO is required to submit personal securities holdings and personal securities transaction reports to a Managing Member.

Dolan McEniry allows Access Persons, as defined in the Code, to invest in fixed income securities, pooled-investment vehicles advised, sub-advised, or underwritten by Dolan McEniry ("reportable funds") and in Dolan McEniry's investment strategies. This creates an inherent conflict of interest for

Dolan McEnery and/or its Access Persons to favor personal or proprietary accounts, as defined in Item 5, over other client accounts when allocating investment opportunities. Dolan McEnery maintains pre-clearance requirements as well as investment and trade allocation policies and procedures to address such conflicts of interest. Dolan McEnery requires Access Persons to pre-clear certain personal securities transactions with the CCO, including transactions in reportable funds and fixed income securities (other than fixed income personal securities transactions in an account(s) managed by Dolan McEnery, following one of Dolan McEnery's investment strategies). Proprietary accounts managed by Dolan McEnery, following one of Dolan McEnery's investment strategies, may be included in a block order along with client trades when Dolan McEnery determines the proprietary accounts are not unfairly advantaged by trading along with client accounts.

Dolan McEnery's Code is available upon request.

Item 12 Brokerage Practices

Selection of Brokers and Directed Brokerage

The selection of BDs is primarily based on the ability of the BD to access the type and quantity of bonds utilized in its strategies, subject to best execution. Dolan McEnery also considers the reputation and integrity of the BD, quality of execution services, the BD's knowledge of the types of securities in which the firm trades, the BD's service and responsiveness, the BD's ability to provide proactive information, the BD's record keeping, administrative and settlement functions, and their experience and relationship with Dolan McEnery.

Dolan McEnery will not direct brokerage on a client's behalf unless specifically directed by the client, generally in writing within the client investment management agreement or a separate letter of instruction. Any change in the designated BD to whom Dolan McEnery is instructed to direct trades must be accompanied by written instructions from the client or the client's authorized representative. When a client requests that brokerage is directed to a particular BD(s), the client may forgo any benefit from savings on execution costs that Dolan McEnery may obtain for other clients, such as negotiating volume discounts on block orders, and the client may not receive the same price paid by other clients who utilize different BDs.

When managing assets for wrap account clients, Dolan McEnery may utilize the wrap sponsor but primarily trades away from the wrap program sponsor which could result in the client being charged additional fees.

Research and Soft Dollars

Dolan McEnery does not have any formal or informal soft dollar arrangements. On occasion, Dolan McEnery receives unsolicited research from outside sources. This information is not used in the investment decision-making process.

Trade Aggregation and Allocation

Dolan McEnery maintains Trade Aggregation and Allocation Procedures that apply to all discretionary accounts managed by Dolan McEnery. The firm strives to treat all clients in a fair manner. This is the basic principle underlying Dolan McEnery's Trade Aggregation and Allocation Procedures, which are designed to provide reasonable assurance that buy and sell opportunities are allocated fairly among clients, subject to the clients' investment objectives and needs, and that, over time, all clients are treated fairly.

It is Dolan McEniry's policy to trade as a firm and to trade in such a manner that its clients are not competing against one another in the marketplace. When practical and where a client has not directed the firm to trade with a specific BD, client trades may be bunched in a single order (a "block") in an effort to obtain best execution at the best security price available. Clients that direct Dolan McEniry to use a specific BD may participate in a block trade when it's determined to be in the best interest of all clients.

Trades are allocated to client accounts based on individual client needs and investment objectives. Trades shall be allocated to client accounts after the completion of each trade, but no later than day's end.

When a trade is suitable for more than one account, trades are generally allocated to an account based on cash percentage, portfolio duration, pro-rata participation, client direction and/or cash limitations. Allocations may be subject to common sense and equitable adjustments and may be subject to minimums in order to reduce odd lots and trading costs.

In all cases, Dolan McEniry shall attempt to allocate securities among clients in a fair manner. It is expected that this policy will be applied consistently; however, Dolan McEniry may deviate from the policy if the standard method of aggregating or allocating trades would result in unfair or inequitable treatment to some or all its clients.

Cross Transactions

Dolan McEniry enters into cross transactions between client accounts when, in its judgment, the transaction is in the best interest of each client participating in the transaction. Dolan McEniry typically engages in cross transactions when one client needs to sell a bond as a result of account liquidation, client instruction to raise cash or portfolio rebalancing and another client has cash available to invest with a need to purchase a similar bond and the firm believes it can execute the trade at a better price than would be available in the market.

Dolan McEniry's cross transaction procedures have been designed to comply with all conditions contained in Rule 17a-7 of the Investment Company Act of 1940. ERISA accounts, IRA accounts, and accounts that are beneficially owned by officers or directors of Dolan McEniry or accounts for the firm's Managing Members and their family members (including private funds of which Dolan McEniry or such persons own more than 5%) are not eligible to participate in cross transactions.

Trade Errors

Trade errors are corrected within a reasonable period of time to make the impacted client(s) whole and so as not to harm any client. If a trade error results in a loss, Dolan McEniry makes the client whole and absorbs the loss. If a trade error results in a gain, the client will keep the gain.

Item 13 Review of Accounts

Dolan McEniry is diligent in maintaining and monitoring client portfolios. Portfolio compliance matters are reviewed weekly at the portfolio and trading review meeting. Further, accounts are reviewed regularly by Portfolio Management, assessing cash balances, account activity, security prices, and adherence to investment guidelines and restrictions. Contributions, withdrawals, rating upgrades/downgrades and corporate actions may trigger additional reviews of client accounts.

Dolan McEniry typically provides written quarterly and annual reports to direct clients (i.e. those

who are not part of a sponsored wrap program or similar program) regarding their accounts. These reports generally contain an asset allocation, portfolio review, performance review, income report, expense report, transaction report and realized gains and losses report.

Item 14 Client Referrals and Other Compensation

Dolan McEniry has entered a relationship with a solicitor who provides client referrals. Dolan McEniry directly compensates this solicitor for any client referrals based on a percentage of assets placed with Dolan McEniry. Dolan McEniry also maintains a relationship with a solicitor who provides client referrals but receives no direct or indirect compensation. Clients will not be charged any higher or additional fee as a result of such arrangements. All client referrals from the solicitors will be conducted in accordance with Rule 206(4)-3 of the Investment Advisers Act of 1940 (the “Advisers Act”) and as of November 4, 2022, with amended Rule 206(4)-1 under the Advisers Act, and any other applicable state or regulatory requirements.

Item 15 Custody

Dolan McEniry does not have custody of client accounts/assets, except as a consequence of its ability to deduct advisory fees directly from client accounts that have provided Dolan McEniry the authority to do so. In these cases, account custodians send statements directly to account owners. As mutually agreed, Dolan McEniry sends clients advisory fee invoices and provides periodic statements. Dolan McEniry encourages its clients to compare information in Dolan McEniry reports to account statements provided by the client’s qualified custodian. Dolan McEniry has no affiliated qualified custodians.

Item 16 Investment Discretion

Dolan McEniry manages each client account on a discretionary basis subject to the signed investment management agreement between Dolan McEniry and the client.

Item 17 Voting Client Securities

The investment advisory agreement between Dolan McEniry and its clients governs the responsibility for voting proxies within client accounts. Due to the nature of fixed income securities, it is very rare for Dolan McEniry to receive a proxy in which to vote. However, clients may obtain information regarding how Dolan McEniry voted any past proxies in addition to a copy of Dolan McEniry’s Proxy Voting and Class Actions Policy by contacting us at the email address or telephone number listed on the first page of this document.

Item 18 Financial Information

Dolan McEniry has no financial conditions which would impair its ability to meet its contractual commitments to its clients.

Other Information

Dolan McEniry’s CCO, Jason Scheffler, is also Director of Operations which presents a conflict of interest in performing the dual roles. Dolan McEniry maintains policies, procedures and controls to

routinely monitor this conflict, and does not believe it results in unfair treatment of its clients.

Identity Theft

To help protect its clients from the risk of identity theft, Dolan McEniry requests its clients provide notification if they receive any alerts within a consumer report or if a credit freeze is placed on a client account which the client believes is related to a potential identity theft matter.