

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:

Beck Capital Management LLC

SEC File Number:

801-70977

Date:

February 2012

Item of Form (identify)	Answer
Part II, Page 2, Item 1.D.	<p>Beck Capital Management LLC (referred hereinafter to as “Advisor”) offers personalized investment advisory services to clients. Advisor’s services and compensation arrangements are described in the following pages.</p> <p>Advisor is a limited liability company formed under the laws of the State of Texas. This Schedule F narrative provides clients with information regarding Advisor and the qualifications, business practices, and nature of advisory services that should be considered before becoming an advisory client of Advisor.</p> <p>Additional information about Advisor is available through the SEC’s website at www.adviserinfo.sec.gov. Clients can search this site by using Advisor’s name or by an identification number known as a CRD number. The CRD number for the Advisor is 152705.</p> <p style="text-align: center;">Advisory Services and Fees</p> <p><u>Asset Management Services</u></p> <p>Advisor provides asset management services defined as giving continuous investment advice to a client and making investments for the client based on the individual needs of the client. Through this service, Advisor offers a highly customized and individualized investment program for clients. A specific asset allocation strategy and investment policy is crafted to focus on the specific client’s goals and objectives. Advisor typically constructs portfolios consisting of securities and investments listed in Item 3 of Part II.</p> <p>Advisor’s investment philosophy centers around a method called Sector Rotation. It <u>begins with a macro-economic view</u> of the world. As economies cycle, different sectors of those economies have distinct advantages, while others move from favor to disadvantage. Fortunately, these usually last for one to five years, so it is not a discipline which requires unusual amounts of trading.</p> <p>One example is during a time of rising interest rates. It is obvious even to the casual observer when the Federal Reserve is raising or lowering rates. The “Fed” seldom, if ever, bounces back and forth between the two. They tend to do one for a period of months or years, then hold steady, followed by another period of raising or lowering. If rates are rising, it will generally hurt stocks of homebuilders and banks, and will lower the value of bonds. It is more expensive to buy a home if mortgage rates are 10% than if they are 6%, so homebuilders will likely sell far fewer homes when rates rise. By the same token, banks will make fewer loans and the older loans, made at lower rates, become less profitable due to the higher costs of money. Bonds suffer a similar fate.</p> <p>There are many other examples of cycling economies which would dictate that a wise investor allocate more investment to some sectors and less to others, rather than always allocating pre-defined percentages to all sectors, at all times, regardless of economic conditions (the typical pie chart allocation). Sector Rotation, instead, allows for a diversified portfolio which simply eliminates the sectors and economies which are currently at the highest statistical risk of decline, while focusing on those sectors with the highest probability of gain.</p> <p>Of course, there are no guarantees that Sector Rotation will outperform other methods of investing. It is simply a strategy that Advisor believes is superior to other investment strategies.</p> <p>Advisor provides asset management services through accounts established under the Fidelity Institutional Wealth Services platform. Clearing, custody and other brokerage services are provided by National Financial Services LLC (NFS) and/or Fidelity Brokerage Services LLC (FBS) for</p>

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Part II, Page 2, Item 1.D. (continued)	<p>accounts established through the Fidelity Institutional Wealth Services platform. Therefore, clients will be required to establish a brokerage account(s) through NFS or FBS. Separate accounts are maintained for each client. Each client retains all rights of ownership of their accounts (e. g. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations). Fidelity Institutional Wealth Services, NFS and FBS are affiliated companies and referred collectively as Fidelity throughout this document. Advisor is not an affiliated company of Fidelity.</p> <p>Advisor will be granted discretionary authorization on the client’s account. When discretionary authority is granted, Advisor will not need to contact the client prior to executing trades in a client account.</p> <p>Upon appointment as an investment advisor of the client’s Fidelity accounts, Advisor shall obtain from the client information to determine the client’s financial situation and investment objectives. Asset management services are provided on the basis of the client’s financial situation and investment objectives. Clients must understand that they are responsible for notifying Advisor when their financial situation or investment objectives change or if the client wants to impose and/or modify any reasonable restrictions with respect to Advisor’s management of their accounts. Advisor is reasonably available to consult with the client relative to the status of the accounts under Advisor’s management.</p> <p><i>Financial Planning Services:</i> As part of its asset management services, Advisor provides clients with financial planning services that may be specific or modular in their preparation (unique to each client in their depth of preparation). Topics included as part of the financial planning services may include the following: organization and assessment, retirement planning, education planning, long-term care, insurance planning, debt management, investments, tax planning, estate planning, and life events.</p> <p>Advisor does not charge a separate or additional fee for financial planning services provided as part of its asset management services. The scope of services provided and topics covered will be detailed in the client agreement for services.</p> <p><i>Asset Management Fees.</i> Clients are charged for Advisor’s asset management services based on a percentage of assets under management. Fees for services generally do not exceed 1.60% annually on the value of the assets under management. Fees are negotiable based on factors such as, but not necessarily limited to, the number of accounts being managed, the amount of assets under management and the overall complexity of the client’s financial situation. The following is a sample fee schedule provided for illustrative purposes.</p> <table><tr><th><u>Assets Under Management</u></th><th><u>Annual Fee</u></th><th><u>(Quarterly Fee)</u></th></tr><tr><td>\$0 to \$250,000</td><td>1.80%</td><td>0.45%</td></tr><tr><td>\$250,001 to \$500,000</td><td>1.50%</td><td>0.375%</td></tr><tr><td>\$500,001 to \$1,000,000</td><td>1.20%</td><td>0.30%</td></tr><tr><td>\$1,000,001 to \$5,000,000</td><td>1.00%</td><td>0.25%</td></tr><tr><td>\$5,000,001 to \$10,000,000</td><td>0.85%</td><td>0.2125%</td></tr><tr><td>Over \$10,000,000</td><td>0.75%</td><td>0.1875%</td></tr></table> <p>The exact services and fees will be agreed upon and disclosed in the agreement for services prior to services being provided. The annual fee is divided and billed quarterly in advance at the beginning of each calendar quarter and will be based on the amount of assets under management at the end of the previous calendar quarter. Fees will be prorated based on the number of days that services are</p>	<u>Assets Under Management</u>	<u>Annual Fee</u>	<u>(Quarterly Fee)</u>	\$0 to \$250,000	1.80%	0.45%	\$250,001 to \$500,000	1.50%	0.375%	\$500,001 to \$1,000,000	1.20%	0.30%	\$1,000,001 to \$5,000,000	1.00%	0.25%	\$5,000,001 to \$10,000,000	0.85%	0.2125%	Over \$10,000,000	0.75%	0.1875%
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Part II, Page 2, Item 1.D. (continued)	<p>provided when the account is established or terminated at anytime other than the beginning of a calendar quarter. Advisor prefers to have its advisory fees deducted directly from the client's account. In these cases, clients must provide the custodian (i.e. Fidelity) with written authorization to have fees deducted from the account and paid to Advisor. Upon discretion of Advisor, clients may pay fees directly to Advisor. For clients that pay directly, payment is due upon receipt of a billing statement from Advisor. Fidelity delivers quarterly or monthly account statements to clients. Among other details, account statements list disbursements for the account including the amount of the advisory fee when deducted directly from the account.</p> <p><i>Other Fees.</i> Brokerage commissions and/or transaction ticket fees charged by the custodian will be billed directly to the client. Advisor will not receive any portion of such commissions or fees from the custodian or client. In addition, clients may incur certain charges imposed by third parties other than the advisor in connection with investments made through the account, including but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges, variable annuity fees and surrender charges, and IRA and qualified retirement plan fees. Fees charged by Advisor are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to clients. A description of these fees and expenses are available in each investment company security's prospectus.</p> <p><i>Termination.</i> Either party may terminate the agreement for services at any time. If services are terminated within five (5) business days of executing the agreement, services will be terminated without penalty and a full refund of all fees paid in advance will be provided. If services are terminated after the initial five day period, Advisor shall provide the client with a pro-rated refund of any fees paid in advance. In the event a client terminates services, termination shall be effective from the time Advisor receives written notification or such other time as may be mutually agreed upon, subject to the settlement of transactions in progress and the final refund of advisory fees. There will be no penalty charge upon termination. In the event Advisor terminates the relationship, the agreement will be terminated on the thirtieth (30) day after written notification is delivered to the client or such time as may be mutually agreed upon, also subject to the settlement of transactions in progress and the final refund of advisory fees. The refund will be based on the number of days service was actually provided during the final billing period.</p> <p><u>Financial Planning Services</u></p> <p>Advisor provides financial planning services in the form of written one-time financial plans and one-time investment consultations. (Although Advisor may provide investment consultations for client's accounts as described herein, Advisor does not implement recommendations or offer asset management services through this program.) Financial planning services may be specific or modular in their preparation (unique to each client in their depth of preparation). Financial planning services may take into consideration each client's objectives, risks that they are willing to undertake, investment knowledge, net worth, income, age, projected retirement, unusual or material funding requirements, inheritance possibilities, pensions, social security, children/relative funding issues, and estate issues. Based on the submitted data and information compilation, suitable recommendations within specific the agreed upon financial planning topics are provided to the client. Topics covered under financial planning services may include, but not necessarily limited to, insurance planning, retirement planning, college planning, estate planning, asset allocation planning, and general investment planning. Advisor does not provide related to budgeting, bill paying, or auto and home insurance needs.</p> <p>Services are provided on a one-time basis; however, Advisor encourages clients to have their financial situations and investment accounts subsequently reviewed on a regular basis. Financial</p>

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Part II, Page 4, Item 5	<p>planning services are billed on a fixed fee basis. Fixed fees typically range between \$1,000 and \$5,000. Fees are negotiable and will depend on factors such as the complexity of a client's financial situation, the topics discussed/covered, the number of accounts reviewed, and the total amount of time Advisor anticipates needing to provide the service.</p> <p>Advisor will charge an initial retainer fee equal to 50% of the total fee that will be due at the time the client services agreement is executed. The remainder of the fee will be due upon completion and presentation of the financial plan. The exact amount of the fee will be determined in advance in will be disclosed in the client services agreement.</p> <p>Clients have the right to terminate an investment and financial consulting services agreement without penalty (i.e. no fees due) within five (5) business days after executing the agreement. After that, investment and financial consulting services terminate upon thirty (30) days after presentation of the written plan or completion of the consultation services, unless mutually agreed upon by Advisor and client in writing. The client may terminate financial planning and portfolio review services at any time by providing notice to the advisor without penalty; however, client will owe advisor a fee for the hours worked prior to notification of the termination multiplied by the agreed upon hourly fee.</p> <p>If a client decides to accept any of Advisor's recommendations, it will be client's responsibility to implement any recommendations. Advisor will not have trading authorization for any of client's accounts and Advisor will not have direct access to client's accounts. At no time will Advisor ever have direct access to client funds and securities. The client's qualified custodian will maintain custody of all funds and securities. To the extent a client would like Advisor to implement any of its recommendations or to the extent a client would like to engage Advisor for on-going asset review services, the client will need to contract for Advisor's asset management services as described in the previous section. Clients that engage Advisor for its asset management services may receive financial planning services in connection with on-going asset management services.</p>
Part II, Page 4, Item 6	<p>Education and Business Standards. Advisor requires individuals providing investment advice to have a bachelor's degree from a four year college and a minimum of two years of related business experience. In addition, individuals must be licensed as investment advisor representatives with the state securities regulators when required.</p> <p>Education and Business Background</p> <p>James "Frank" Beck, Born 05/1955</p> <p><i>Education Background:</i> Bachelor of Science – Mathematics, minor in Economics University of Texas, 1977</p> <p><i>Business Background & Other Business Activity:</i> Beck Capital Management LLC, Managing Member & President 12/2009 – Present; and Investment Advisor Representative, 01/2010 – Present; Partnervest Advisory Services LLC (doing business under the names Capital Financial Group and Pro-Player Investing), Investment Advisor Representative, 07/2005 – 02/2010; Frishberg Advisory Services LLC, Investment Advisor Representative, 02/1998 – 07/2005; JP Securities, Registered Representative, 09/1997 – 08/1998; and MONY Securities, Registered Representative, 05/1987 – 08/1997. Austin Computer Consultants, President, 07/1983 – 04/1987 First Trust Advisors, 01/1980 – 04/1983</p>

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	<p>Lewis Spellman PhD, Born 2/1939 <i>Education Background:</i> BBA and MBA – University of Michigan MA and PhD in Economics – Stanford University</p> <p><i>Business Background & Other Business Activity:</i> Beck Capital Management LLC, Investment Advisory Board Member, 12/2010 – Present; Professor at the McCombs School of Business at the University of Texas, 9/1971 – Present/ Magna Carta Insurance Company, Director and Chair of Investments, 2006 – Present Chairman of the President’s Council of Economic Advisors for the Johnson Administration And Economist with the Federal Reserve Board.</p> <p>Justin M. Simmons, Born 10/1981 <i>Education Background:</i> Bachelor of Arts – Finance, University of Texas, 2004</p> <p><i>Business Background & Other Business Activity:</i> Beck Capital Management LLC, Investment Advisor Representative, 01/2010 – Present; Partnervest Advisory Services LLC (doing business under the names Capital Financial Group and Pro-Player Investing), Investment Advisor Representative, 05/2007 – 02/2010; Partnervest Securities, Inc., Registered Representative, 08/2007 – 12/2007; Ameriprise Financial Services, Registered Representative, 02/2007 – 05/2007; No Employment, 11/2006 – 01/2007; and Los Angeles Dodgers Baseball Organization, Professional Athlete, 05/2004 – 11/2006.</p> <p>Jerry McIlhlon, Born 07/1955 <i>Education Background:</i> Attended the University of Northern Iowa, 1973 – 1975</p> <p><i>Business Background & Other Business Activity:</i> Beck Capital Management LLC, Investment Advisor Representative, 02/2010 – Present; Partnervest Advisory Services LLC (doing business under the names Capital Financial Group and Pro-Player Investing), Investment Advisor Representative, 07/2005 – 02/2010; Partnervest Securities, Inc., Registered Representative, 07/2005 – 12/2006; LPL Financial, Registered Representative, 10/2003 – 07/2005; and Jefferson Pilot Securities, Registered Representative, 08/1998 – 10/2003.</p> <p>Melanie A. Johnson, Born 03/1966 <i>Education Background</i> Bachelor of Science – Education, Texas State University, 1992</p> <p><i>Business Background & Other Business Activity:</i> Beck Capital Management LLC, Investment Advisor Representative, 04/2011 – Present Divorce Financial Solutions, Consultant, 10/2004 – Present Athena Financial Group, Inc., Investment Advisor Representative, 10/2004 – 03/2001</p>

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Part II, Page 5, Item 9.E.	<p>Lockhart School District, Teacher, 08-1996 – 08/2004 Austin Independent School District, Teacher, 12/1992 – 05/1996</p> <p>William F. Gregory, Born 03/1968 <i>Education Background:</i> Bachelor of Science – Exercise Science, History/Chemistry, 1995</p> <p><i>Business Background & Other Business Activity:</i> Beck Capital Management LLC, Chief Compliance Officer and Manager-Client Relations, 12/2009 – Present Partnervest Advisory Services LLC (doing business under the names Capital Financial Group and Pro-Player Investing), Manager-Client Relations, 03/2000 – 02/2010. Janus Funds, Registered Representative, 10/1998 – 03/2000</p> <p>While Advisor does not sell products or services other than investment advice, clients should be aware that some of Advisor’s associated persons are separately licensed as independent insurance agents for various insurance companies and agencies. In these separate capacities, these individuals are able to implement recommended insurance transactions for advisory clients for compensation in addition to investment advisory fees charged by Advisor. However, only a small percentage of their time is dedicated to insurance business and Advisor’s associated persons do not typically recommend insurance products to advisory clients. Clients should be aware that associated persons will generally only recommend insurance products of those companies for whom the associated persons are sales agents and with which the associated persons are familiar with the benefits, exclusions and other terms.</p>
Part II, Page 5, Item 11.A.	<p>Participation or Interest in Client Transactions. Advisor and its associated persons may buy or sell securities that are also recommended to clients. In order to minimize this conflict of interest, securities recommended by Advisor are widely held and publicly traded. In addition, in accordance with its fiduciary duty to clients, Advisor and its associated persons will place client interests ahead of their own interests.</p>
Part II, Page 5, Item 11.B.	<p>Code of Ethics. Section 204A-1 of the <i>Investment Advisers Act of 1940</i> requires all investment advisers to establish, maintain and enforce a Code of Ethics. Advisor has established a Code of Ethics that will apply to all of its associated persons. An investment adviser is considered a fiduciary according to the <i>Investment Advisers Act of 1940</i>. As a fiduciary, it is an investment adviser’s responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. Advisor has a fiduciary duty to all clients. This fiduciary duty is considered the core underlying principle for the advisor’s Code of Ethics which also covers its Insider Trading and Personal Securities Transactions Policies and Procedures. Advisor requires all of its supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and when changes occur, all supervised persons will sign an acknowledgement that they have read, understand and agree to comply with the advisor’s Code of Ethics. Advisor has the responsibility to make sure that the interests of all clients are placed ahead of Advisor’s or its supervised person’s own investment interest. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to any services being conducted. Advisor and its supervised persons must conduct business in an honest, ethical and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of advisor’s Code of Ethics. However, if a client or a</p>

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Part II, Page 6, Item 12.A.(1) and (2)	<p>potential client wishes to review advisor's Code of Ethics in its entirety, a copy will be provided promptly upon request.</p> <p>Review of Accounts.</p> <p>Stand-alone financial planning services terminate upon completion of such services and full payment of all fees due. Therefore, no reviews are conducted for these clients. If clients elect to have a review and update to an original consultation, additional fees may be charged and clients may be required to sign a new client agreement.</p> <p>Account reviews are provided in connection with asset management accounts. For clients participating in this program, one of the Advisor's representatives will contact clients at least annually for the purpose of reviewing their account and to determine if there have been changes in their financial situation or investment objectives. The calendar is the main triggering factor, although more frequent reviews may also be triggered by changes in the client's circumstances, client request, or changes within the market. The underlying investments held in client accounts are reviewed on a more frequent basis. Portfolios are usually reviewed as frequently as weekly, but no less than monthly. Triggering factors for changes to underlying portfolios include the relative valuation changes between asset classes, deviation from management style by fund, or fund closures.</p> <p>James "Frank" Beck, Justin Simmons, and Jerry McIlhon, Melanie Johnson are responsible for providing all investment advisory services and making all investment recommendations to their respective clients. James Frank Beck is the sole manager for the discretionary portfolios held at Fidelity Investments.</p> <p>Clients receive account statements directly from Fidelity. Statements will be delivered at least quarterly. In addition, Advisor may provide newsletters covering general financial planning and investment topics.</p> <p>Investment or Brokerage Discretion. Upon receiving written authorization from the client, Advisor provides discretionary investment advisory services for client accounts. Advisor's discretionary authority will be granted by the client in the client agreement. When discretionary authority is granted, it is limited in that Advisor will only be given discretionary trading authority. This authority will allow Advisor to determine the type of securities and the amount of securities that can be bought or sold for the client portfolio without obtaining the client's consent for each transaction.</p> <p>Advisor does not perform proxy-voting services on a client's behalf. Clients are instructed to read through the information provided with the proxy-voting documents and to make a determination based on the information provided. Upon request from the client, Advisor may provide limited clarifications of the issues presented in the proxy voting materials based on Advisor's understanding of issues presented in the proxy-voting materials. However, the client will have the ultimate responsibility for making all proxy-voting decisions.</p> <p>Recommendation of Broker/Dealer. Clients wishing to implement the advice provided in conjunction with financial planning services of the Advisor are free to select any broker/dealer or investment advisor they wish and are so informed. For clients that wish to establish an account managed by Advisor, Advisor requires clients establish an account through Fidelity as a result of Advisor's participation in the Fidelity Institutional Wealth Services platform (FIWS).</p> <p>While there is no direct linkage between the investment advice given to clients and Advisor's</p>
Part II, Page 6, Item 12.B. and Item 13.A.	

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Customer Privacy Policy	<p>participation in the FIWS program, economic benefits are received by Advisor which would not be received if Advisor did not give investment advice to clients.</p> <p>These benefits include: A dedicated trade desk that services FIWS participants exclusively, a dedicated service group and an account services manager dedicated to Advisor's accounts, access to a real-time order matching system, ability to "block" clients' trades, electronic download of trades, balances and position information, access, for a fee, to an electronic interface with FIIBG's software, duplicate and batched client statements, confirmations and year-end summaries, the ability to have advisory fees directly debited from client accounts (in accordance with federal and state requirements) availability of third-party research and technology through "soft dollar" arrangements, a quarterly newsletter, access to Fidelity mutual funds, access to AdvisorChannel.com (internet access to statements, confirmation and transfer of asset status), access to Account View (through which clients may access their account information over the internet via Advisor's web site), access to over 350 mutual fund families and 4500 mutual funds not affiliated with Fidelity, of which over 2,000 have no transaction fees, ability to have loads waived for Advisor's clients who invest in certain Fidelity loaded funds when certain conditions are met and maintained, and the ability to have custody fees waived (when negotiated by the advisor and allowed under certain circumstances).</p> <p>At least annually, Advisor will review alternative custodians in the marketplace for comparison to Fidelity, evaluating criteria such as overall expertise, cost competitiveness, and financial condition. Quality of execution for custodians will be reviewed through trade journal evaluations. No single criteria will validate nor invalidate a custodian or service provided used, but rather, all criteria taken together will be used in evaluating the currently utilized custodian.</p> <p>Transactions for each client account will be effected independently, unless Advisor decides to purchase or sell the same securities for several clients at approximately the same time. Advisor does frequently combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among Advisor's clients differences in prices and transaction fees or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among Advisor's clients in proportion to the purchase and sale orders placed for each client account on any given day. When Advisor determines to aggregate client orders for the purchase or sale of securities, including securities in which Advisor's Associated Person(s) may invest, Advisor shall do so in accordance with the parameters set forth in SEC No-Action Letter, <i>SMC Capital, Inc.</i> Advisor shall not receive any additional compensation or remuneration as a result of the aggregation.</p> <p>Additional Compensation – Insurance Commissions. Advisor's associated persons may, from time to time, receive commissions and other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of this compensation may affect the judgment of Advisor's associated persons when recommending products to its clients.</p> <p>While Advisor's associated persons endeavor at all time to put the interest of the clients first as a part of Advisor's fiduciary duty, clients should be aware that the receipt of commission and additional compensation itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations.</p> <p style="text-align: center;"><u>CUSTOMER PRIVACY POLICY</u></p> <p>Regulation S-P, Privacy of Consumer Financial Information, requires financial institutions, including Advisor, to provide notice to current clients and prospective clients about their policies and practices concerning the collection and use of customer, non-public information. This privacy policy notice is</p>

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	<p>given to all prospective clients of Advisor upon entering into a contract with Advisor and annually thereafter.</p> <p>Privacy Disclosure Statement. A primary goal of Advisor is to protect the privacy of its clients. Advisor does not sell the personal information of clients to anyone.</p> <p>To conduct regular business, Advisor may collect nonpublic personal information from clients. This information is provided by clients to Advisor on applications and other forms provided by clients to Advisor as well as transactions with the firm, our affiliates, or others.</p> <p>Advisor may enter into contracts with outside third parties so that Advisor can assist its clients in servicing their accounts. In order to do this, Advisor will disclose personal information to companies that help Advisor process transactions for client accounts (for example, executing client trades at through a broker/dealer). However, Advisor does not share or disclose any nonpublic customer information except as allowed or required by law. In addition to sharing information in order to provide financial services to clients, Advisor may be required to disclose personal information to cooperate with regulators or law enforcement authorities, to resolve customer disputes, or for risk control.</p> <p>Information Safeguarding. Advisor has implemented strict policies and procedures aimed at protecting the sensitive nature of client information. Advisor restricts access to client information to only those members of Advisor that must provide products and services to clients in order to service client accounts. Advisor has implemented physical, electronic, and procedural safeguards aimed at meeting Advisor's duty to protect nonpublic client information.</p> <p>If you have any questions concerning Advisor's customer privacy policy or concerns about your personal information please feel free to contact Mr. Frank Beck at the number located on the Form ADV Part II cover page.</p>

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