

**Item 1 – Cover Page**

**BHK Securities, LLC**

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March 27, 2013

This Brochure provides information about the qualifications and business practices of BHK Securities, LLC. If you have any questions about the contents of this Brochure, please contact us at 205-322-2025. 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.

BHK Securities, LLC is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. This Brochure is intended, in part, to provide information which can be used to make a determination to hire or retain an Adviser.

Additional information about BHK Securities, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Material Changes**

There have been no material changes since our last brochure dated March 21, 2012.

Pursuant to new SEC Rules, we will ensure that you receive 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 material changes as necessary.

We will provide you with a new Brochure as necessary based on changes or new information, at any time, without charge. Our Brochure may be requested by contacting Meredyth Roberts Hazzard or James Bailey Knight at the numbers above.

Additional information about BHK Securities, LLC ("BHKS") is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site provides information about any persons affiliated with BHKS who are registered, or are required to be registered, as investment adviser representatives of BHKS.

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#### Item 4 – Advisory Business

BHK Securities, LLC was established in 2006 and approved as a Registered Investment Adviser in September 2006. The three shareholders and executive officers include Meredyth Roberts Hazzard (CEO), John Gurney Brock (President), and James Bailey Knight (CCO). Please refer to Item 10 for more information on BHK Advisors, Inc. which is an affiliated Registered Investment Adviser under common control.

BHK Securities, LLC (“Introducing Firm” or “BHKS”) has entered into an agreement with First Clearing, LLC (“First Clearing” or “Clearing Agent”) and Wells Fargo Advisors, LLC, (“Wells Fargo”) pursuant to which Wells Fargo provides advisory and/or administers various wrap fee programs that are sponsored by BHKS (“Programs”). Currently, BHKS offers the following Programs: Masters Investment Consulting (“Masters”), Diversified Managed Allocations (“DMA”), Wells Fargo Compass Advisory Program (“Compass”), CustomChoice, Pathways, FundSource, and Network Investment Consulting (“Network”). Private Investment Management (“PIM”) and Asset Advisor (“Asset Advisor”) are offered under a separate wrap fee brochure. Clients of investment advisory accounts described herein are clients of BHKS. Wells Fargo provides advisory and/or other services to BHKS with respect to all of the programs but provides investment advice that is tailored to the needs of a particular client only with respect to Masters, DMA, Wells Fargo Compass Advisory, and FundSource. Unless otherwise specified, Clearing agent will maintain custody of client assets. Clearing Agent qualifies as a “qualified custodian” as described by Rule 206(4)-2 of the Investment Advisers Act.

BHKS provides investment advisory services by recommending money managers and/or Wells Fargo programs that best meet the client needs based on the investment objectives given by the client and other selection criteria. The Wells Fargo Programs provide investment advice, brokerage, and custodial services under a “wrap fee” arrangement. Generally, in a wrap fee arrangement, the account pays a combined fee for investment advice, brokerage services, clearance and settlement services, and custodial services. The account may also be charged for expenses or services that are not covered by the wrap fee and these will be described in the Program’s separate “Wrap Brochure” provided to the client or in the client’s separate agreement with First Clearing or Wells Fargo.

In certain Wells Fargo Programs, the client may choose to receive investment recommendations on a nondiscretionary or discretionary basis. Some of the Wells Fargo Programs also permit the client to elect to have the account’s assets rebalanced automatically at pre-determined intervals as an aid to ensure the portfolio continues to reflect its intended asset allocations.

The managers available through the Wells Fargo Programs employ a variety of investment strategies depending on the particular Program, the size of the account, the needs of the client, and the account's objectives. Ordinarily, the managers’ strategies include long or short-term purchases of securities and, sometimes, may include supplemental covered option writing, where appropriate, depending on the account’s objectives and the manager’s style. Some strategies may also include margin transactions, other option or trading strategies, or short-sale transactions. Investment decisions in some Wells Fargo Programs are guided by model portfolios intended to reflect the investment objectives and needs of the client. See separate program brochures for further information.

Masters is a program that allows you and your BHKS Financial Advisor to objectively choose an outside professional investment manager from a select list of firms nationwide — a manager with a proven ability to manage money the way you want it managed. While many of these managers ordinarily require a minimum investment of \$1 million or more, our Masters program has a minimum account size

of only \$100,000. A Masters portfolio is a professionally managed, separate account (holdings can include individual stocks and fixed income) for which you pay an all-inclusive fee that covers a package of services: management fees, transaction charges and consulting services. Your Financial Advisor monitors the manager's performance and provides you with a detailed analysis four times a year.

DMA is a program whereby Wells Fargo will provide to BHKS a universe of investment advisors that are evaluated by Wells Fargo and meet minimum quantitative and qualitative research criteria as defined by Wells Fargo. In addition, Wells Fargo will provide to BHKS sets of optimal blends of said DMA investment advisors that are designed as optimal combinations of different styles and investment classes based on the client's investment objectives and the amount the client will invest.

Compass Advisory is a program whereby Wells Fargo will provide Introducing Firm with model investment portfolios based on certain established criteria, based on its evaluation of a client's financial goals, circumstances and risk tolerances. The portfolios are designed for a specific investor;

Pathways is a program whereby Russell Investment Management Company ("Russell") will provide a universe of optimal blends of model investment portfolios<sup>1</sup> or accept instructions from the client with respect to a Custom Blend in various mutual funds that are operated and administered by Russell, based on its evaluation of a client's financial goals, circumstances and risk tolerances. The portfolios are designed for a specific investor.

FundSource is a mutual fund wrap-fee program, which is based on a custom choice process using diversification and asset allocation. You may choose to allow the CSG Research Department to have discretion over your portfolio, or you may choose to construct your own customized portfolio using over 3600 no-load and load-waived mutual funds. In all cases, mutual funds are sold by prospectus only. The Fund Source program includes ongoing monitoring of each recommended mutual fund by the CSG research team, and quarterly performance reports. The minimum account size is \$25,000.

Through Network Investment Consulting ("Network"), BHKS will assist clients in identifying an investment adviser to advise and counsel a client regarding the client's investment of assets. BHKS services may include assisting clients prepare an investment policy statement in connection with anticipated advisory needs, matching personal and financial data provided by a client with a database of investment advisers provided to Introducing Firm by Wells Fargo, periodic evaluation and comparison of account performance, and continuing investment performance and objectives. The purpose of Network is for BHKS to provide clients with information on a continuing basis on which to base decisions with respect to its selection and evaluation of investment advisers. All accounts are managed by the independent advisers and BHKS has no discretionary trading authority with respect to such accounts.

Client is advised of the following: that an advisor's past performance is no guarantee of future results; that there is a certain market and/or interest rate risk which may adversely affect any advisor's objectives and strategies, and could cause a loss in a client's account; and there is no guarantee that they will be met or exceeded.

As of December 31, 2012, BHKS held \$16,321,438 in discretionary assets under management and \$198,389,997 in non-discretionary assets under management.

## Item 5 – Fees and Compensation

Each Program has a different Program Fee schedule, which can vary depending on the particular investment strategies or portfolios selected by the client, the particular manager selected by the client, and the individual Advisor, among other factors. Generally, the Advisor may, in his or her discretion, negotiate the portion of the Program Fee that is payable to the Advisor or the Firm, but does not negotiate the portion payable to Wells Fargo or a third-party manager. The client's Advisory Agreement will state the specific Program Fee applicable to client's account.

The fees are based on the assets under management and in some instances, may be negotiated. Fees are in the form of an annual rate that is calculated and assessed in advance on a quarterly basis. If an account is terminated during a quarter, a prorated balance of the fees may be refunded. The following Maximum Program Fee schedule is typical for many Wells Fargo Programs, but can vary widely.

### Wells Fargo Programs – Maximum Standard Fee Schedule

Total Account Value	Annualized Program Fee
First \$500,000	3.00%
Next \$500,000	2.50%
Next \$500,000	2.00%
Over \$2,000,000	Negotiable

The specific manner in which fees are charged by BHKS is established in a client's written agreement. BHKS will bill its fees on a quarterly basis in advance. Fees will be debited directly from the client's account, are based on the assets under management and in some instances, may be negotiated. The fees are based on the assets under management and in some instances, may be negotiated. Fees are in the form of an annual rate that is calculated and assessed in advance on a quarterly basis.

The account value is calculated as the market value of all long and short securities positions in the account. Although the fees listed above are "default" fees, they may, in some circumstances, be negotiable. The fee encompasses all transaction related costs associated with the execution of the transaction. The client shall pay an initial fee from the account to BHKS on the date of acceptance of the contract based upon the value of the account on the date of acceptance and prorated through the end of the calendar quarter. Thereafter, the quarterly fee shall be paid to BHKS on the first business day of each succeeding calendar quarter based upon the value of the account on the last business day of the prior calendar quarter. In the case of a net capital contribution or withdrawal, fees will be prorated and charged or refunded if the net addition or net withdrawal would generate a fee or refund of at least \$40 for that quarter. No fee adjustment will be made during any fee period for appreciation or depreciation in the market value of assets in the account during that period. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. The client will maintain or deposit sufficient funds in the account to cover payment of all fees authorized by the contract and the client authorizes BHKS and clearing firm to debit the account balances or redeem money market fund shares in the amount equal to the fee that is due. If there are not funds to cover the fees, then BHKS may liquidate assets to cover fees. The service fee schedule may be changed upon written notification from BHKS to the client.

A portion of the fees described herein may be paid to BHKS Financial Advisors in connection with the provision of investment advice and/or client-related services within those programs. This compensation may be more than BHKS's Financial Advisors would receive if clients paid separately for investment

advice, brokerage, and other services and; therefore, BHKS Financial Advisors may have a financial incentive to recommend the program services over other programs or services.

The Wells Fargo Program Fees are subject to exclusions, calculations, and conditions contained in each Wells Fargo Program's Disclosure Document and Advisory Agreement. Additionally, most Wells Fargo Programs have a minimum quarterly Program Fee (which may be \$375 per quarter or more), which may cause the effective Program Fee (expressed as a percentage) to be greater than the fee rates shown above. The Disclosure Document for each Program contains important information regarding conflicts of interest, compensation, risks, potential benefits, and other information that prospective investors should review and considered.

Under Masters, DMA, and Wells Fargo Compass Advisory, and Pathway, a wrap fee is charged for BHKS's consulting and BHKS's or its agent's brokerage services, as well as the services of any advisor hired to provide portfolio advice and administrative services to the particular account.

Network clients have the choice of compensating BHKS in one of two ways for Network services: (1) payment for execution services, including brokerage commissions on agency trades or markups or markdowns on principal transactions, with no separate charge for Network services (Execution Schedule) or (2) payment of a fee for both Network services and execution services, with no separate charge being imposed by us for brokerage commissions on agency trades or markups or markdowns on principal transactions, except mutual fund purchases, if any (Fee Schedule). Also in connection with the Fee Schedule option, certain clients may determine to liquidate their portfolios in a separate account and incur commission charges before transfer of assets into the Network account; such assets would be subject to the fees described in addition to the commissions. Certain advisory affiliates of Clearing Agent may serve as Network Program advisers.

Commissions or fees charged to client accounts under Network, CustomChoice, and FundSource, or the wrap fee under Masters, DMA, PIM, Asset Advisor, and Wells Fargo Compass Advisory, may be higher than those otherwise available if the services were provided separately for a discrete fee, or if an investment advisor were to select brokerage and negotiate commissions in the absence of the extra consulting service provided.

As a shareholder of a money market fund or mutual fund, in addition to fees paid by a client to BHKS under a program, the client will bear a proportionate share of the fund's expenses, including the investment management fees that are paid to the fund's investment adviser, and will bear any other charges levied by a fund (e.g., redemption fees). For more information about fund expenses, see the fund's prospectus. Wrap fees also do not include fees related to adoption, maintenance, and closure of retirement accounts. A description of these and other expenses are available in each fund's prospectus.

Generally, BHKS purchases no-load mutual funds which do not generate sales charges. Load and no-load mutual funds may pay annual distribution charges, sometimes referred to as 12b-1 fees. 12b-1 fees come from fund assets, therefore, indirectly from client assets. 12b-1 fees may be initially paid to BHKS and a portion passed to Advisory Representatives. The receipt of such fees could represent an incentive for Advisory Representatives to recommend funds with 12b-1 fees over funds that have no fees or lower fees. As a result, there is a potential conflict of interest.

The wrap program may cost the client more or less than purchasing such services separately and will depend on the trading activity in the client's account. The cost of non-wrapped investment advisory

services is lower than investment advisory services provided under the wrap program. Because BHKS may receive more compensation from a client from the client's participation in the Program than if the client received advisory services and brokerage services separately, BHKS may have a financial incentive to recommend the Program to clients over other types of advisory services. BHKS may give advice to others that may be different from the advice given to Program clients. Clients should consider the value of the additional consulting services when making such comparisons. The combination of custodial, consulting, and brokerage services may not be available separately or may require multiple accounts, documentation, and fees. In addition, certain advisors may not be available to certain clients outside the consulting relationship because of minimum account sizes, fee schedules, geographic availability, or other factors. A non-wrapped pricing arrangement may be more cost effective for accounts that do not experience frequent trading activity. Because of the single fee charged to a Program account, BHKS may be regarded as having a conflict of interest in that it may realize a greater profit on a Program account with a relatively low rate of portfolio turnover compared to other types of accounts, assuming the same level of fees.

All fees may be subject to negotiation. When negotiating fees, factors considered, but not limited to, include: (i) clients with multiple accounts; (ii) size of the account; (iii) a prior or existing relationship; and (iv) a client's particular needs or financial characteristics. Due to the fact that fees may vary, clients with existing accounts may be charged fees which do not match precisely the foregoing fee schedules or the fees paid by other clients.

Other costs that may be assessed and that are not part of those outlined above include fees for portfolio transactions executed away from the broker/custodian selected by the client, dealer mark-ups, electronic fund and wire transfers, spreads paid to market-makers, and exchange fees, among others. The broker/custodian may charge client certain additional and/or minimum fees.

The Program wrap fee does not include: (i) annual account fees or other administrative fees, such as wire fees, charged by First Clearing (ii) certain odd-lot differentials, transfer taxes, transaction fees mandated by the Securities Act of 1934, postage and handling fees, and charges imposed by law with regard to transactions in the client's account; and (iii) advisory fees, expenses or sales charges (loads) of mutual funds (including money market funds), closed-end investment companies or other managed investments, if any, held in client's account.

BHKS receives compensation from the custodian based on the value of credit balances in the accounts. If cash is swept into a money market fund, BHKS receives compensation based on the value of assets in these funds as broker-dealer. Thus, BHKS has an incentive to recommend that clients select money market funds as a sweep vehicle that pays more compensation to BHKS than other funds.

**ACCOUNT TERMINATION LANGUAGE:** If the ADV disclosure document was not delivered to the client at least 48 hours prior to the client entering into any written or oral advisory contract with this investment adviser, then the client has the right to terminate the contract without penalty within five business days after entering into the contract. For the purposes of this provision, a contract is considered entered into when all parties to the contract have signed the contract, or in the case of an oral contract otherwise signified their acceptance, any other provisions of this contract notwithstanding.

Upon termination, all securities and cash positions will remain intact; absent any liquidation orders. If specific liquidation orders are received, BHKS and its agent will, in an orderly and efficient manner, proceed with liquidation of the client's account. There will not be a charge by us for such redemption;



however, the client should be aware that certain mutual funds impose redemption fees as stated in each company's fund prospectus in certain circumstances. Clients must keep in mind that the decision to liquidate security issues or mutual funds may result in tax consequences that should be discussed with the client's tax advisor.

Client should refer to the respective program ADV disclosure document for program details. Factors that may affect the orderly and efficient manner would be size and types of issues, liquidity of the markets, and market makers' abilities. Should the necessary securities' markets be unavailable and trading suspended, efforts to trade will be done as soon as possible following their reopening. Due to the administrative processing time needed to terminate client's investment advisory service and communicate the instructions to client's investment advisor, termination orders received from clients are not market orders; it may take several business days under normal market conditions to process client's request. During this time, client's account is subject to market risk. BHKS and its agent are not responsible for market fluctuations of the client's account from time of written notice until complete liquidation. All efforts will be made to process the termination in an efficient and timely manner.

#### **Item 6 – Performance-Based Fees and Side-By-Side Management**

BHKS does not 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**

BHKS provides portfolio management services to individuals, corporations and business entities, pension and profit-sharing plans, charitable institutions, foundations, endowments, estates and trusts.

See the Program Disclosure Documents for more information about the Program fees and information regarding minimum account sizes. The minimum account size may be different for IRA accounts. Under certain limited circumstances, the minimum may be waived. The client should refer to the respective managers Disclosure Document, as appropriate, to determine the minimum and maximum account sizes permitted.

#### **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

The advisors selected by clients in DMA, Masters, and Network employ similar methods of analysis that are described to clients both by Wells Fargo and in each such advisor's Disclosure Document. The Program advisors each employ a variety of investment strategies depending on the client and the client's objectives. Such strategies ordinarily include long or short-term purchase of securities and, depending on the client objectives and advisor's style, supplemental covered option writing. However, in special circumstances the strategies may also include margin transactions, other option or trading strategies or short-sale transactions. Investment decisions for Wachovia Compass Advisory clients are derived from disciplined model portfolios based on established guidelines as modified to satisfy the individual investment objectives and needs of each client.

Investment recommendations for Asset Advisor and CustomChoice clients are based on an analysis of the client's individual needs, and are drawn from research and analysis BHKS believes reliable. The mutual funds available for clients in the Asset Advisor and CustomChoice program are from the Wells Fargo Allowable List of funds.

The programs may encompass: exchange listed securities; over the counter and foreign securities; rights and warrants; corporate, municipal and U.S. Government debt securities; securities options and futures; partnership interests involving real estate and oil and gas investments; real estate investment trusts ("REITS"); mortgage backed securities; certificates of deposit; commodities and related option and futures contracts, including financial futures; commercial paper; variable annuities; money market funds, exchange-traded fund shares; closed-end mutual fund shares; certain wrap class alternative investments, such as hedge funds and managed futures funds; and mutual fund shares from Wells Fargo's Allowable List. This Allowable List includes only open-end mutual funds that offer shares at net asset value through advisory programs, such as those described in its document. Some of the funds may be advised by, or otherwise affiliated with, Wells Fargo or the Clearing Agent.

It is important to note that investing in securities involves certain risks that are borne by the investor. For any risks associated with Investment Company products, please refer to the prospectuses for additional details about these risks. Our investment approach constantly keeps the risk of loss in mind. These risks include, but are not limited to:

- Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

#### **Item 9 – Disciplinary Information**

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of BHKS or the integrity of BHKS's management. BHKS has no information applicable to this Item.

### **Item 10 – Other Financial Industry Activities and Affiliations**

BHK Advisors, LLC is affiliated through common control and is effectively registered as a Registered Investment Adviser. BHKS is owned by a holding company, BHK Holdings, LLC, which also owns 100% of BHKS. Clients of BHKS may also be clients of BHK Advisors, LLC. All clients of BHK Advisors, LLC are delivered a separate disclosure document which contains relevant information and related disclosures. Advisors spend an estimated 20% of their time on these business activities outside of being an Investment Adviser. BHKS is also registered as an insurance agency.

For those advisory clients who wish to use broker/dealer or insurance products to attain their goals, clients are reminded that such services are not offered as part of the advisory service and fees are separate. Advisory clients are under no obligation to purchase any broker/dealer or insurance products. As a broker/dealer, trade errors may occur on occasion and may result in profit or loss to the firm. The firm has controls in place to limit such trade errors. Individual Advisers will not participate in any profits resulting from such errors and the Chief Compliance Officer will review a trade error log to ensure that no conflicts and/or patterns exist.

For broker/dealer and insurance services, the Adviser or its associated persons may receive compensation for such transactions, where such compensation is separate and distinct from Adviser's compensation related to its investment advisory services. From time to time, associated persons of the Adviser may recommend that clients buy or sell securities or investment products that the Adviser also owns. In such circumstances, the Adviser shall adhere to the Code of Ethics.

### **Item 11 – Code of Ethics**

BHKS has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at BHKS must acknowledge the terms of the Code of Ethics annually, or as amended.

Advisors of BHKS may buy or sell securities that are recommended to clients. BHKS's employees and persons associated with BHKS are required to follow the Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of BHKS and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for BHKS's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of BHKS will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of BHKS's clients. In addition, the Code requires pre-approval of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between BHKS and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis

when consistent with BHKS's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. BHKS will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

BHKS's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting James Bailey Knight or Meredyth Roberts Hazzard at our main number.

### **Item 12 – Brokerage Practices**

For BHKS client accounts maintained in its custody, First Clearing generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through First Clearing or that settle into First Clearing accounts. First Clearing may make products and services available to BHKS that benefit BHKS but may not directly benefit its clients' accounts. Many of these products and services are used to service all or a substantial number of BHKS accounts. Some of these products and services provided by First Clearing includes software and other technology that (i) provides access to client account data (such as trade confirmations and account statements); (ii) facilitates trade execution and allocates aggregated trade orders for multiple client accounts; (iii) provides pricing, charts and other market data; (iv) facilitates payment of BHKS fees from its clients' accounts; and (v) assists with back-office functions, recordkeeping and client reporting.

Block Trading Disclosure: It is the practice of BHKS, its agent, or the third party investment advisors, when feasible, to aggregate for execution as a single transaction orders for the purchase or sale of a particular security for the accounts of several Program Clients, in order to seek a lower commission or more advantageous net price. The benefit, if any, obtained as a result of such aggregation is generally allocated on a pro rata basis among the accounts of clients that participated in the aggregated transaction in accordance with procedures adopted by BHKS.

### **Item 13 – Review of Accounts**

BHKS provides its investment consulting clients with periodic reports of relevant activity. In addition to the portfolio monitor service report as described herein, BHKS, through the Clearing Agent or its agent, will transmit to clients (and where appropriate to the applicable investment advisor) the following reports:

- trade confirmations reflecting all transactions in securities; provided, however, that periodic statements of account activity may be furnished in lieu of transaction by transaction confirmations to the extent and in the manner permitted by Rule 10b-10 under the Exchange Act; and
- a statement of account activity at least quarterly.

Accounts are assigned to investment advisors who are responsible for performing periodic reviews of the account and consult with the respective client of the account. Following these reviews, reports are prepared to assist principals in supervising and monitoring the account. Factors that are considered include, but are not limited to the following: investment objectives, targeted allocation, current allocation, suitability, performance, number of trades, monthly distributions, concentrated positions, diversification, and outside holdings.

Not less than annually, the firm will contact the client and request current information to determine whether there have been any changes in the information provided in the questionnaire. Client agrees to inform the firm in writing of any material changes in the information included in the questionnaire or otherwise the client's financial circumstances that might affect the manner in which client's assets should be invested. Client may contact the firm during normal business hours to consult with the firm concerning the management of the client's account(s).

#### **Item 14 – Client Referrals and Other Compensation**

BHKS does not compensate for client referrals.

#### **Item 15 – Custody**

BHKS requires that clients establish brokerage accounts with First Clearing, LLC ("First Clearing"), a broker-dealer, to maintain custody of clients' assets and to effect trades for their accounts. Although BHKS may recommend that clients establish accounts at First Clearing, it is the client's decision to custody assets with First Clearing. BHKS is independently owned and operated and not affiliated with First Clearing.

Clients should receive statements at least quarterly from First Clearing, the qualified custodian that holds and maintains your investment assets. BHKS urges you to carefully review such statements and compare the official custodial records to the account statements that we may provide you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

#### **Item 16 – Investment Discretion**

BHKS offers both discretionary and non-discretionary investment advice. When the client chooses to grant investment discretion to the Adviser, the Adviser will have authority to supervise and direct the investments of and for the client's account(s) without prior consultation with the client. Pursuant to this discretionary authority, the Adviser will determine which securities are bought and sold for the account and the total amount of such purchases and sales. The Adviser will make investment decisions for client accounts in accordance with the investment objectives, risk tolerance, investment time horizon, and any investment policies, guidelines, or reasonable restrictions as the client may impose in writing, and to which the Adviser agrees. Pursuant to the client's instruction, client money/cash may be invested in a money market mutual fund managed by their custodian who may charge a fee. Clients should contact their custodian for more information about this investment of their cash.

Each client has the ability to impose reasonable restrictions on the management of his/her account, including the designation of particular securities or types of securities that should not be purchased for the account, or that should be sold if held in the account. If a client's instructions are unreasonable or an IAR believes that the instructions are inappropriate for the client, BHKS will notify the client that, unless the instructions are modified, it may cancel the instructions in the client's account. A client will not be able to provide instructions that prohibit or restrict the Investment Adviser of an open-end or closed-end mutual fund or ETF with respect to the purchase or sale of specific securities or types of securities within the fund.

**Item 17 – Voting Client Securities**

BHKS does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Clients will receive their proxies or other solicitations directly from their custodian or transfer agent. Clients should contact their IAR if they have any questions and/or to obtain this information.

**Item 18 – Financial Information**

Registered Investment Advisers are required to provide you with certain financial information or disclosures about BHKS's financial condition. BHKS has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of any bankruptcy proceeding.

**Privacy Policy**

We collect nonpublic personal information about you from the following sources: information we receive on applications, questionnaires, web site, or other forms and information about your transactions with our affiliates, others, or us. We do not disclose any non-public information about our current or former customers to anyone, except as permitted by law or in order to provide the current services. Our employees have limited access to your personal information based on their responsibilities to provide products or services to you. Be assured that we maintain physical, electronic and procedural safeguards in compliance with federal standards to protect your information.