

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page

L.D. Lowe Wealth Advisory, Inc.

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This brochure provides information about the qualifications and business practices of L.D. Lowe Wealth Advisory, Inc. It is prepared pursuant to regulatory requirements. If you have any questions about the contents of this brochure, please contact us at the phone number or website listed above. 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. L.D. Lowe Wealth Advisory, Inc. is a Registered Investment Advisor with the SEC under the Investment Advisors Act of 1940 (the "Advisors Act"). However, such registration does not imply a certain level of skill or training. Additional information about L.D. Lowe Wealth Advisory, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

Dated: March 30, 2015

Item 2 Material Changes

The SEC requires that we provide to all of our clients an annual summary of material changes made to our firm's Brochure. This Brochure has been updated with the following material changes that have occurred since the last annual update of February 27, 2014

Item 4 Advisory Business

- As of 12/31/2014, we were actively managing \$106,715,833 of clients' assets on a discretionary basis plus \$2,488,630 of clients' assets on a non-discretionary basis.

Additionally, in March 2015, Sharon Goldberg became our Chief Compliance Officer replacing William Pantuso.

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Item 4 Advisory Business

INTRODUCTION

L.D. Lowe Wealth Advisory, Inc. dba LD Lowe Wealth Advisory is a Registered Investment Advisory firm registered with the U.S. Securities and Exchange Commission (SEC) since October 7, 2005. We are noticed filed in our home state of Texas, which means we are registered to do business in this state. We may conduct business in other states by claiming an exemption from registration. Our registration as an Investment Adviser does not imply any level of skill or training. The oral and written communications we provide you, including this Brochure, is information you can use to evaluate us and other advisers, which are factors in your decision to hire us or to continue to maintain a mutually beneficial relationship. This Brochure provides information about our qualifications and business practices.

OWNERSHIP

L.D. Lowe Wealth Advisory, Inc. is a corporation headquartered in Dallas, Texas, which was founded in 1999. Lloyd D. Lowe Sr., President, is 99% partner and Lucinda A. Lowe is 1% partner.

ADVISORY SERVICES OFFERED

We provide Wealth Management Services to our discretionary accounts, which include a combination of investment management and financial planning services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and corporations and other business entities. We also assist you with the selection of money managers appropriate for the management of your portfolio. We may also provide investment advice on interests in partnerships, real estate, and REITs.

Our service constitutes an ongoing process by which:

- a) Your investment objectives, constraints and preferences are identified and specified;
- b) Your strategies are developed and implemented through a combination of financial assets;
- c) Capital market conditions and your circumstances are monitored; and
- d) Portfolio adjustments are made as appropriate to reflect significant changes to any or all of the above relevant variables.

We also offer these services on a non-discretionary basis.

The following is a detailed description of the programs offered by us.

INVESTMENT MANAGEMENT SERVICES:

We provide portfolio management services on either a discretionary or non-discretionary basis. Our portfolio management service consists of asset allocation and portfolio management tailored to meet your investment goals.

On a discretionary basis, we design, revise and reallocate a custom portfolio for you. The investments are determined based upon your investment objectives, risk tolerance, net worth, net income, age, investment time horizon, tax situation and other various suitability factors.

On a non-discretionary basis, we provide periodic recommendations to you and if such recommendations are approved, we will ensure that the authorized recommendations are carried out.

Our portfolios are composed of stocks, mutual funds, REITs, ETFs, LPs, and Fixed Income Annuities aka Equity Index Annuities that we may use in your portfolio.

We will analyze the investment objectives of each client to determine the investment portfolio best suited for you. We will evaluate your financial situation through a review of financial information and in-depth personal interviews that include understanding your investment objectives and risk tolerances. We will advise you regarding portfolio diversification utilizing common or preferred stocks, options, mutual funds, warrants, rights, corporate municipal or government bonds, notes or bills, options and futures contracts, partnership interests, REITS or other alternative investments, and cash or cash equivalents.

Custody of client accounts for both securities and funds will be maintained at a qualified designated custodian and clearing firm selected by you or our Firm.

FINANCIAL PLANNING SERVICES:

We may provide a comprehensive financial planning service. Financial planning services can simplify and determine financial and investment alternatives by:

1. Defining and narrowing a client's objectives and investment option,
2. Identifying areas of greatest concern,
3. Creating a picture of the client's overall financial situation, and
4. Providing an effective and efficient way for LD Lowe Wealth Advisory to address a client's unique financial needs and objectives.

Financial plans are based on your financial situation at the time the plan is presented. You are advised that certain assumptions may be made with respect to interest and inflation rates, as well as past trends, historical market performance, and the economy. Past performance is in no way an indication of future results. We cannot offer any guarantees or promises that your financial goals and objectives will be met. As your financial situation, goals, objectives, or needs change, you must promptly notify us.

Upon completion of the written financial plan, we will provide implementation services through our portfolio management services. We may also work in conjunction with your other professional advisers, e.g. accountant or legal. Under such arrangements, we will act as a project manager that coordinates the work of the appropriate parties in a manner consistent with your objectives. Implementation of the prepared plan or recommendations is solely at your discretion. We encourage you to utilize any desired professional or group of professionals to assist in the implementation.

Annual updates will be provided upon client request. Client is responsible for reporting to LD Lowe Wealth Advisory any life changing events.

THIRD PARTY INVESTMENT ADVISER SELECTION SERVICES:

We may recommend that you utilize the services of a Third Party Investment Adviser ("TPA") to manage your portfolio. We would recommend to you a TPA whose investment style is believed to be consistent with your financial needs, investment goals, tolerance for risk and stated investment objectives. Upon selection of a TPA, we will monitor the performance of the TPA to ensure their performance and investment style remains aligned with the investment goals and objectives. The TPA is granted discretionary authority by you to manage and invest your assets.

Clients who are referred to TPAs will receive full disclosure, including services rendered and fee schedules at the time of the referral by delivery of a copy of the relevant TPA's brochure or equivalent disclosure document.

The Manager may impose a minimum dollar amount of initial client assets for the investment advisory services as disclosed in the management agreement. These minimums may be waived at the Manager's discretion. Clients will be provided the appropriate Manager's disclosure statement, in addition to the Manager's ADV Part 2A Brochure and privacy policy, prior to placing the assets with the Manager.

PENSION CONSULTING SERVICES:

We will provide pension-consulting services to employee benefit plans, which includes 401(k) plans and their fiduciaries based upon an analysis of the needs of the plan. In general, these services may include an₅

existing plan review, asset allocation advice, money management services, communication and education services where we will assist the plan sponsor in providing meaningful information regarding the retirement plan to its participants, investment performance monitoring, and/or ongoing consulting. We may have agreements with Third Party Administrators to provide these services as part of the Third Party Administrator's agreement with the plan. In these instances, the Third Party Administrator may pay a portion of the fee charged to the plan to us for their services. In other instances, we may be introduced to a plan through a Third Party Administrator and will provide service directly to the plan.

OTHER PRODUCTS:

In addition to traditional products, we may utilize the following products in your investment strategies:

Fixed Index Annuities aka Equity Index Annuities:

We offer Fixed Index Annuities aka Equity Index Annuities to meet your fixed income objectives products. Fixed-indexed annuities are financial instruments in which the issuer, usually an insurance company, guarantees a stated interest rate and some protection from loss of principal, and provides an opportunity to earn additional interest based on the performance of a securities market index. Fixed Index Annuities are included in the assets under management and are subject to the applicable asset management fee. We will receive a commission in addition to our management fee.

Alternative Investments:

We may recommend to you to invest in alternative investments that may be suitable for your stated investment goals, risk temperament, and investment objectives. The alternative investments can range from short term to long term investment vehicles that have various investment objectives including real estate interests offered through a private REIT or limited partnership interests, structured notes etc. Additional information for suggested alternative investment including a discussion of certain significant risks of investing and additional fees involved will be disclosed in the related Private Placement Memorandum. Qualified persons should read the Memorandum carefully before investing.

OTHER SERVICES:

Tax Preparation Service:

We refer clients requesting tax preparation services to CPAs. You will pay directly to CPA any costs relating to the tax preparation service that is not included in your management fee. The CPA reimburses us for the cost of mailing and labor for scanning documents. As such, the referral is not a conflict of interest as no monetary compensation is paid by either us or the CPA to the other party.

It is your responsibility to research and understand any legal or tax ramifications of any distributions you make from your accounts. We do not provide legal or tax advice. If you take a distribution from an IRA or an annuity with growth, and you are under 59 ½ years of age you will be penalized by the IRS if you do not qualify for an exception. It is your responsibility to determine if you qualify for an exception from this penalty.

We will withhold a minimum of 20% for federal income tax on all distributions from tax deferred accounts unless you direct otherwise.

Consulting Services:

You can also receive investment advice on a more limited basis. This may include advice on only an isolated area(s) of concern such as estate planning, retirement planning, or any other specific topic. We provide specific consultation services regarding your current or projected financial position or other investment and financial concerns that you may have. Advice offered by LD Lowe Wealth Advisory may involve investments in mutual funds.

Philanthropic Counseling & Management:

We can assist you in defining your goals when pledging money or assets to a charitable cause. We also assist in investing and managing the pledged money or assets. Asset management fees will be charged for managing the pledged money or assets.

ASSETS UNDER MANAGEMENT:

As of December 31, 2014, LD Lowe Wealth Advisory has approximately 106,715,833 in discretionary assets under management and \$2,488,630 in non-discretionary assets under management for a total of \$109,204,463 in total assets.

Item 5 Fees and Compensation

PORTFOLIO MANAGEMENT PROGRAM FEE SCHEDULE:

Our discretionary portfolio management services called Wealth Management Services, is a combination of our Financial Planning and Portfolio Management Services and is offered on a wrap fee basis. The fees assessed may be negotiated on a case by case basis.

It is based on all "assets under management" that have been recommended and invested by us. This includes all cash and cash equivalents held in your accounts. Wrap pricing allows you to pay an all-inclusive fee for management, brokerage, clearance, custody and administrative services. The above fees include but are not limited to the cost of:

- Trading including transaction costs, custodial fees etc.
- Research and investment management
- Financial, estate and risk management planning plus ongoing tracking
- Client meetings and phone calls
- Preparation of your personal tax return (\$500k min assets under management)
- Preparation of basic estate documents (\$1mil min assets under management)

We will pay to TD Ameritrade the transaction/execution costs associated with the equity transactions. A potential disincentive to trade securities may be presented under this arrangement.

WEALTH MANAGEMENT SERVICES FEE SCHEDULE:

Assets Under Management		Annual Fee
\$0 - \$1 million	of Investment Assets	2.00%
\$1 - 2 million	of Investment Assets	1.50%
\$2 - 3 million	of Investment Assets	1.00%
Investment Assets exceeding	\$3,000,000	0.75%

If assets will not be immediately managed by us, we reserve the right to charge the minimum fee as a retainer to be offset by fees charged once assets are under management.

Our fees charged are negotiable in situations where your portfolio size begins outside our published fee brackets or in other situations deemed appropriate by us in our sole discretion.

Our non-discretionary portfolio management services are based on a non-wrap pricing basis. Custodial services, account maintenance, transaction fees and other fees associated with maintaining your account is separate and in addition to the management fee charged by us.

Portfolio Management fees will be directly deducted from your account at the custodian quarterly in advanced from your accounts within thirty (30) days following the end of the quarter. We will send the qualified custodian written notice of the amount of the fee to be deducted from your account.

We and/or the custodian shall provide written notice/invoice documentation reasonably supporting the determination of the investment advisor fees. The Custodian will send to you a quarterly Account statement that shows the amount of our advisory fee, the value of your assets upon which the fee was based, and the specific manner in which the fee was calculated. We will verify that the Custodian sends Account statements on a quarterly basis.

You should compare invoices for advisory fees to the corresponding custodian statement. Statements should

be received from the custodian no less than annually. Statements from TD Ameritrade should be received on a monthly basis. If statements are not received, contact us immediately.

Our fees are based on the percentages listed in the Fee Schedule on account market values based on the last business day of each calendar quarter. Fees are calculated by multiplying the assets under management market value by the relevant percent and dividing such product by four (4). Fees for the initial quarter will be adjusted pro-rata based upon the number of calendar days in the calendar quarter that the Agreement goes into effect.

The fee that we charge is in addition to the management fee that the adviser of a mutual fund receives for managing the fund's portfolio. In certain instances, depending upon the client's needs and the services to be performed by us, a contract may be entered into with a fee different from the fee schedule set forth above. This fee would be based upon individual negotiations with you. Fees are computed on an annual or quarterly basis and are payable in advance. Fees are not required to be prepaid more than six months in advance.

Additional Types of Fees or Expenses:

You are hereby advised that all fees paid to us for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. Further, there may be transaction charges involved with purchasing or selling of securities. We do not share in any portion of the brokerage fees/transaction charges imposed by the custodian holding the client funds or securities. You should review all fees charged by mutual funds, us, and others to fully understand the total amount of fees to be paid by you.

Termination:

Portfolio and Wealth Management Agreements may be terminated by either party immediately upon receiving a written notice to the other party. Fees paid in advance will be prorated to the date of termination specified in the notice and any unearned portion thereof will be refunded. Contracts terminate immediately upon death and billed fees paid will not be refunded.

FINANCIAL PLANNING SERVICES FEE SCHEDULE:

Our financial planning fee depends on the scope, complexity and work to be performed by our firm. We have a conflict of interest when providing financial planning advice. If you decide to have us implement the advice given in the plan, we receive the customary fees as disclosed herein. You are not required to employ us to implement the financial plan, or to implement the plan. Financial Planning fees are charged on an hourly rate between \$115 and \$500 depending on the advisory agent. The Financial Plan fee is negotiated with you prior to preparation. The fee will be billed at time of service and will be due upon receipt of an invoice.

THIRD PARTY INVESTMENT ADVISER SELECTION SERVICES FEE SCHEDULE:

We will either share in the fee paid by you to the TPA or charge a fee that is in addition to the fee paid to the TPA. A sub-adviser may receive a portion of the advisory fee paid by you to us for investment research and management of your accounts. Complete disclosure of the amount of the fee received by us will be available in the management agreement given to you under "Solicitor Disclosure". We will not receive a commission for any transaction. In addition, if the investment program recommended to you is a wrap fee program, you will also receive the equivalent wrap fee brochure provided by the sponsor of the program.

The basic fee schedule for these services will vary based on the TPA chosen to provide this service. The fee will be based on the amount of assets managed and may be negotiable. Such compensation may differ depending upon the individual agreement we have with each TPA. As such, we may have an incentive to recommend one TPA over another TPA with whom we have a less favorable compensation arrangement with or other advisory programs offered by TPAs with which we have no compensation arrangement. Fees may be negotiated based on various factors including size, sophistication, services provided etc.

Termination:

You may be required to sign an agreement directly with the TPA(s) selected. You may terminate the management agreement according to the terms disclosed in the management agreement. If fees are paid prior to service being rendered, and you terminate services, the prorated fees for the portion not used will be returned.

PENSION CONSULTING SERVICES FEE SCHEDULE:

The compensation arrangement for these services will be based on the same provisions as disclosed above in the portfolio management section. The type and amount of the fees charged to you is subject to negotiation and will be based on the scope and complexity of the qualified plan and the requested services. An estimate of the total cost will be determined at the start of the advisory relationship. We require the payment of fees for pension consulting services quarterly in advance. Under no circumstance will we require prepayment of a fee more than six months in advance and in excess of \$1,200.

ERISA and the Pension Protection Act of 2006 (PPA):

We may also have IRA accounts or other retirement accounts that are subject to the Pension Protection Act of 2006 (PPA). In all cases, an “eligible investment advice arrangement” or advisory agreement will be executed with the Client. We will be considered a “fiduciary advisor” and will charge fees to the retirement account based on a Level Fees basis which means the fees will not vary depending on the basis of the investment option selected.

In order for the investment adviser to be deemed “eligible, LD Lowe will take the following steps:

1. assure the arrangement is expressly authorized by the fiduciary other than the fiduciary advisor;
2. obtain an annual report from an independent expert demonstrating compliance with the rules;
3. provide comprehensive disclosures to participants or beneficiaries;
4. execute all transactions on an arm's length basis and for reasonable compensation; and
5. must maintain six years of evidence of compliance.

CONSULTING FEE SCHEDULE:

For consulting services we will charge \$500.00 per hour. Depending upon a number of factors, including, but not limited to, the complexity of the issues involved, the amount of time and resources that must be committed to the project, and the level of expertise and experience of the consultants involved in the project a flat fee may apply. You will be quoted the total charge for the services to be rendered and must agree prior to entering into an engagement agreement with us.

Philanthropic Counseling & Management:

We will charge \$500.00 per hour for philanthropic counseling & management services. Asset management fees will be charged for managing the pledged money or assets.

OTHER PRODUCTS AND SERVICES FEE SCHEDULE:

Fixed Index Annuities aka Equity Index Annuities:

As licensed insurance agents, advisory agents of our firm may receive a commission for the purchase of a Fixed Index Annuities by you. Fixed Index Annuities are included in the assets under management and are subject to the applicable asset management fee. Fees are offset by the commission earned when purchasing an annuity.

Alternative Investments:

We will receive a commission on any alternative investments. Alternative investments are included in the assets under management and are subject to applicable asset management fees. Alternative investments include revenue from the production of natural gas and/or oil, oil & gas royalty interests acquired for the fund, real estate interests including private REITs and limited partnership interests, structured notes etc. These products may also contain fees and charges in addition to what is disclosed here. For complete disclosure please see the private placement memorandum.

Tax Preparation Service:

We cover the cost of a basic tax return for clients with \$500,000 or more in assets under management.

Other Compensation Received by our firm or its advisory agents:

Advisory Agents of LD Lowe Wealth Advisory are also licensed insurance agents for various companies. If you elect to implement a plan through our advisory agents, they may receive a commission from insurance sales, which includes life, accident, disability, long term care, Medicare supplemental and fixed index annuities and fixed annuities. This presents a conflict of interest to the extent that the advisory agent recommends the purchase of an insurance product that results in a commission being paid to the advisory agent as an insurance agent. We have no single agreement with any agency or company, but will seek out the products of any company, agency or brokerage that may have products fitting your needs.

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

We do not charge performance based fees nor do we provide side by side management services.

Item 7 Types of Clients

CLIENT BASE:

Our customer base consists of individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities. These are the types of clients that we service, but we may not have all these types as current clients.

CONDITIONS FOR ACCOUNT MANAGEMENT:

Preparation of your personal tax return requires \$500,000 minimum assets under management, and preparation of basic estate documents require \$1,000,000 minimum assets under management.

We may make exception to this minimum from time to time based on individual factors such as length of time the account has been known, overall composition of the account, multiple accounts held with advisor etc. We manage accounts on a per household basis and the account minimum shall be based on the combined asset value of all household accounts.

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

METHODS OF ANALYSIS & INVESTMENT STRATEGIES:

We work with you to devise an investment strategy to meet your financial objectives. This includes:

- discussion regarding your objectives
- review of existing holdings
- ongoing analysis of funds
- advice on best direction for new investments
- updates of specific changes within the market or to particular funds
- periodic monitoring of recommended investments and yearly review

We use model portfolios of mutual funds, Exchange Traded Funds(ETFs) and Variable Annuity sub- accounts provided by a number of institutional investment strategists and based on the information, research, asset allocation methodology and investment strategies of these institutional strategists.

We use technical and fundamental compiled by data services. We may use other sources of information that may include, but are not limited to, other professionals in the area of financial planning as well as information obtained through presentations given by professional associations and other sources.

Fundamental Analysis involves using real data to evaluate a security's value. We perform fundamental analysis on a securities value by looking at economic factors, such as interest rates and the overall state of the economy, information about issuers, potential changes in credit ratings, revenues, earnings, future growth, return on equity, profit margins and other data to determine underlying value and potential for future growth.

Technical Analysis involves studying supply and demand in the market to determine what direction, or trend will continue in the future by understanding the emotions in the market as opposed to its components. Understanding the benefits and limitations of technical analysis can give a new set of tools or skills that will enable us to be a better trader or investor.

Our security analysis information is based on a number of sources including financial newspapers, periodicals, commercially available investment services, issuer prepared information, security rating services, general market and financial information, due diligence reviews and specific investment analysis that our clients may request.

RISK OF LOSS:

The advice offered by our Firm to clients is determined by the areas of expertise of the agent providing the service and the client's stated objective. Our clients are advised to notify our Firm promptly if there are ever any changes in your financial situation or investment objective or if you wish to impose any reasonable restrictions upon our management services. If you wish to impose any reasonable restrictions upon our management services, you will need to advise us in writing of any restrictions.

We do not represent, warrant, or imply that the services or methods of analysis employed by us can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. All securities trading, whether in stocks, options, or other investment vehicles, is speculative in nature and involves substantial risk of loss that clients should be prepared to bear. Past performance is not necessarily indicative of future results. Clients should make every effort to understand the risks involved.

The Principle Risks of Investing include, but are not limited to:

General Risks:

Your investments with us are not a deposit of a bank and are not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency. Accordingly, you may lose money by investing with us. When you sell your investments, they may be worth less than what you paid for them because the value of investments will fluctuate reflecting day-to-day changes in market conditions, interest rates and a number of other factors.

Allocation Risk:

Our allocation of investments among different asset classes, such as equity or fixed- income assets classes, may have a more significant effect on your returns when one of these classes is performing more poorly than others.

Market Risk:

Stock and bond markets often trade in random price patterns, and prices can fall over sustained periods of time. The value of the investments we make for you will fluctuate as the financial markets fluctuate. This could result in your account value(s) declining over short or long term periods of time.

Focused and Concentrated Portfolio Risks:

We will often invest your assets in a smaller number of securities than other broadly diversified investment strategies. Our approach is often referred to as “focused, concentrated, or non-diversified”. Accordingly, the money we manage for you may have more volatility and is often considered to have more risk than a strategy that invests in a greater number of securities because changes in the value of a single security may have a more significant effect, either negative or positive, on your overall portfolio value. To the extent we invest your assets in fewer securities, or we investment in non-diversified funds that take a focused or concentrated approach, your assets are subject to greater risk of loss if any of those securities become permanently impaired.

Equity Risk:

Your investments will be subjected to the risk that stock prices may fall over short or extended periods of time. Historically, the equity markets have moved in cycles, and the value of equity securities in your portfolio may fluctuate drastically from day to day. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments. The prices of securities issued by such companies may suffer a decline in response. These factors will contribute to the volatility and risk of your assets.

Special Situation Risk:

We may invest your assets in special situations. Investments in special situations may involve greater risks when compared to other strategies due to a variety of factors.

Expected changes may not occur, or transactions may take longer than originally anticipated, resulting in lower returns than contemplated at the time of investment. Additionally, failure to anticipate changes in the circumstances affecting these types of investments may result in permanent loss of capital, where we may be unable to recoup some or all of its investment.

Foreign Securities Risk:

We have the ability to invest in foreign securities, and, from time to time, a significant percentage of your assets may be composed of foreign investments. Foreign investments involve greater risk in comparison to domestic investments because foreign companies/securities: may have different auditing, accounting, and financial reporting standards; may not be subject to the same degree of regulation as U.S. companies, and may have less publicly available information than U.S. companies; and are often denominated in a currency other than the U.S. dollar.

Currency Risk:

Your investments may be subject to currency risk. Currency fluctuations and changes in the exchange rates between foreign currencies and the U.S. dollar could negatively affect the value of your investments in foreign securities.

Interest Rate Risk: Your investments are subject to interest rate risk. Interest rate risk is the risk that the value of a security will decline because of a change in general interest rates. Investments subject to interest rate risk will usually decrease in value when interest rates rise. For example, fixed-income securities with long maturities typically experience a more pronounced change in value when interest rates change.

Credit Risk:

Your investments are subject to credit risk. An investments credit quality depends on its ability to pay interest on and repay its debt and other obligations.

Small- to Medium-Capitalization Risk:

We may invest your assets in small to medium sized companies. Shares of small to medium sized companies may have more volatile share prices. Furthermore, the securities of small to medium companies often have less market liquidity and their share prices can react with more volatility to changes in the general marketplace.

Junk Bond/High-Yield Security Risk:

We may invest your assets in Junk Bonds or High-Yield, lower rated securities. Investments in fixed-income securities that are rated below Investment grade can be subject to greater risk of loss of principal and interest than investments in higher-rated fixed-income securities. The market for high yield securities may be less liquid than the market for higher-rated securities. High yield securities are also generally considered to be subject to greater market risk than higher-rated securities. The capacity of issuers of high yield securities to pay interest and repay principal is more likely to weaken than is that of issuers of higher-rated securities in times of deteriorating economic conditions or rising interest rates.

Prepayment Risk:

Your investments may be subject to prepayment risk. Prepayment risk occurs when the issuer of a security can repay principal prior to the security's maturity. Securities subject to prepayment can offer less potential for gains during a declining interest rate environment and similar or greater potential for loss in a rising interest rate environment. In addition, the potential impact of prepayment features on the price of a security can be difficult to predict and result in greater volatility.

Inflation Risk:

This is the risk that the value of your assets or income you're your investments will be less in the future as inflation decreases the value of your money. As inflation increases, the value (purchasing power) of your assets can decline. This risk increases as we invest a greater portion of your assets in fixed- income securities with longer maturities.

Liquidity Risk:

Liquidity risk exists when particular investments are difficult to purchase or sell, possibly preventing us from selling out of these illiquid securities at an advantageous price.

Item 9 Disciplinary Information

We do not have any material facts about legal or disciplinary events that are material to your evaluation of the integrity of our firm or its advisory agents to disclose. Your confidence and trust placed in our Firm and its advisory agents is something we value and endeavor to protect.

Item 10 Other Financial Industry Activities and Affiliations

Other Financial Industry Relationships:

Advisory Agents of LD Lowe Wealth Advisory are also licensed insurance agents for various companies. If you elect to implement a plan through our advisory agents, they may receive a commission from insurance sales, which includes life, accident, disability, long term care, Medicare supplemental and fixed index annuities and fixed annuities. This presents a conflict of interest to the extent that the advisory agent recommends the purchase of an insurance product, which results in a commission being paid to the advisory agent as an insurance agent. We have no single agreement with any agency or company, but will seek out the products of any company, agency or brokerage that may have products fitting your needs.

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

CODE OF ETHICS:

We have adopted a Code of Ethics Policy to prohibit conflicts of interest from personal trading by our advisory personnel and have established standards of conduct expected of our advisory personnel. We have set forth in the Code of Ethics Policy statements of general principles, required course of conduct, reporting obligations, and review and enforcement of the Code of Ethics Policy. We will provide a copy of the Code of Ethics Policy to our clients or prospective client's upon written request.

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS / PERSONAL TRADING:

Our Advisory Agents will buy or sell for themselves securities that they also recommend to you. These investment products will be bought and sold on the same basis as you buy them. We will transact your transactions and business before their own when similar securities are being bought or sold. In all instances, the positions would be so small as to have no impact on the pricing or performance of the security. We will do everything possible to mitigate these conflicts. Records of all advisory associate's proprietary trading activities are reviewed and kept by us. We and our advisory agents will act in a fiduciary manner, understand the prohibitions against the use of any insider information and will always act in your best interest.

We have an affiliate that serves as general partner for limited partnerships that invest in oil and gas properties. We may recommend investments in these limited partnerships to some clients when we believe the investments are suitable and serve the client's interest.

Item 12 Brokerage Practices

BROKERAGE SELECTION:

We generally select the brokers or dealers to handle securities transactions. We utilize TD Ameritrade (Member FINRA/SIPC), as the broker-dealer for the execution of securities transactions. You are not obligated to transact business through TD Ameritrade.

Factors that we consider when recommending TD Ameritrade include their respective financial strength, reputation, execution, pricing, research and service. We understand and acknowledge that at all times we owe a fiduciary duty to you to obtain best execution for your transactions. We believe that our relationship with TD Ameritrade helps us to execute securities transactions for you in such a manner that your total cost in each transaction is as favorable as possible under prevailing market conditions. However, accounts with TD Ameritrade as a full service broker/dealer, may not obtain best execution at all times. The commissions and/or transactional fees charged by TD Ameritrade to you may be higher or lower than those charged by another broker-dealer.

It is our policy to select brokers on the basis of the best combination of cost and execution capability. Subject to its best execution obligations, we intend to use the broker-dealer to effect all or substantially all client securities transactions. We may develop other broker-dealer arrangements with other unaffiliated

broker-dealer firm's at our discretion.

We may recommend/require that clients establish brokerage accounts with TD Ameritrade, a registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. The final decision to custody assets with TD Ameritrade is at the discretion of the Advisor's clients, including those accounts under ERISA or IRA rules and regulations, in which case the client is acting as either the plan sponsor or IRA accountholder. We are independently owned and operated and not affiliated with TD Ameritrade. TD Ameritrade provides us with access to its institutional trading and custody services, which are typically not available to TD Ameritrade retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at TD Ameritrade. TD Ameritrade's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment for our client accounts maintained in its custody, TD Ameritrade generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through TD Ameritrade or that settle into TD Ameritrade accounts.

BEST EXECUTION:

When making liquidation decisions for discretionary accounts, or suggesting brokers to you, we will endeavor to select those firms that provide the best execution under the circumstances. In this capacity we currently utilize TD Ameritrade. "Best execution" means obtaining for the client the lowest total cost (in purchasing a security) or highest total proceeds (in selling a security), taking into account the circumstances of the transaction and the reputability and reliability of the executing broker/dealer. In determining whether a particular broker or dealer is likely to provide best execution in a particular transaction, we consider factors that it deems relevant to the broker/dealer's execution capability. For example, determining factors may include price, the size of the transaction, the amount of the commission, and the ability of the broker/dealer to effect transactions, reputation in the marketplace, reliability, and financial responsibility. We can't receive best execution on portfolio liquidations and we can't assure best execution is always received. Execution costs may be more expensive than that can be obtained through a true discount broker/dealer.

ADDITIONAL SERVICES RECEIVED BY OUR FIRM:

Trades may be done with brokers who are selected on the basis of research products or services. These may be used for the benefit of all clients and are not necessarily used exclusively by the account for which the transaction was made. The types of products and services include written and oral reports concerning current or prospective portfolio holdings, economic interpretations, and portfolio strategy. You are not charged for these services and the information received may be used to benefit all clients of our Firm.

TD Ameritrade also makes available to us other products and services that benefit us but may not benefit its clients' accounts. These benefits may include national, regional or our specific educational events organized and/or sponsored by TD Ameritrade. Other potential benefits may include occasional business entertainment of personnel of our firm by TD Ameritrade Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist us in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of our fees from its clients' accounts, and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of our accounts, including accounts not maintained at TD Ameritrade Institutional. TD Ameritrade Institutional also makes available to us other services intended to help us manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, TD Ameritrade may make

available, arrange and/or pay vendors for these types of services rendered to us by independent third parties. TD Ameritrade Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to us. While, as a fiduciary, we endeavor to act in our clients' best interests, our recommendation or requirement that clients maintain their assets in accounts at TD Ameritrade may be based in part on the benefit to us of the availability of some of the foregoing products and services and other arrangements and not solely on the nature, cost or quality of custody and brokerage services provided by TD Ameritrade, which may create a potential conflict of interest.

BROKERAGE FOR CLIENT REFERRALS:

Neither our Firm nor our Advisory Agents receive client referrals from a broker dealer or other third party when recommending to you a broker-dealer for the execution of securities transactions.

DIRECTED BROKERAGE:

If you want to direct us to use a particular broker dealer to handle security transactions then you are responsible for the custodian fee arrangement. You should understand that this might prevent us from effectively negotiating brokerage compensation or obtaining the most favorable net price and execution. When directing brokerage business, you should consider whether the commission expenses, execution, clearance and settlement capabilities that you will obtain through another broker dealer are adequately favorable in comparison to those that our Firm would otherwise obtain for you using TD Ameritrade. We do evaluate periodically the execution performance of the brokers-dealers including TD Ameritrade. We encourage you to discuss available alternatives with our advisory agents.

Neither this Firm nor our advisory agents receive any products, research or services other than those disclosed.

AGGREGATION OF TRADES:

We may aggregate orders with respect to a security if such aggregation is consistent with achieving best execution for the various client accounts. When orders are aggregated, each participating account receives the weighted average share price for all transactions in a particular security effected to fill such orders on a given business day and transaction costs are shared pro rata based upon each accounts participation in the transaction. Allocations of orders among client accounts must be made in a fair and equitable manner.

Item 13 Review of Accounts

Managed accounts will be reviewed on a weekly basis, but at a minimum shall be reviewed annually or by your request. Reviews may be warranted more frequently due to tax law changes, market changes, market conditions or changes in personal circumstances. Reviews initiated by you may be for personal objectives or for any reason you so desire. The accounts are reviewed for including, but not limited to, continued suitability, comfort level, risk tolerance relative to returns, and appropriateness. These reviews will be conducted by Sharon Goldberg our Chief Compliance Officer.

Statements, confirmations and/or performance reports are furnished monthly or quarterly from various financial services institutions/firms with which you transact business. These firms may include, and are not limited to, brokerages, investment companies, insurance companies, trust companies, other registered investment advisors, banks and credit unions. You will receive account statements from these entities and not our Firm. The monthly account statements from the custodian indicate activity, previous portfolio balances, current portfolio balances, and account summary. We may also assist you in interpreting and/or compiling statements or reports and transferring relevant information onto the appropriate place on your financial statements as part of our review process. We will provide to you periodic performance and fee notices in connection with your account. Fixed Index Annuities clients will receive statements directly from the applicable insurance company or provider.

If we provide you only financial planning or analysis services, you will not receive regular reports on your accounts after the financial planning or analysis services have been concluded.

Item 14 Client Referrals and Other Compensation

Our firm may pay referral fees to independent persons or firms ("Solicitors") for introducing clients to us. Whenever we pay a referral fee, we require the Solicitor to provide the prospective client with a copy of this document (our Firm Brochure) and a separate disclosure statement that includes the following information:

- the Solicitor's name and relationship with our firm;
- the fact that the Solicitor is being paid a referral fee;
- the amount of the fee; and
- whether the fee paid to us by the client will be increased above our normal fees in order to compensate the Solicitor.

As a matter of firm practice, the advisory fees paid to us by clients referred by solicitors are not increased as a result of any referral.

Other Compensation:

No other compensation is received other than what is already disclosed.

Item 15 Custody

Your funds and securities will be maintained with a "qualified custodian" as required under Rule 206(4)-2 under the Advisers Act and we will not take physical possession of any client funds or securities. Custody of client accounts for both securities and funds will be maintained at TD Ameritrade (Member FINRA/SIPC), or other qualified custodian as directed by you.

Account statements are sent quarterly from the custodians and you should carefully review those statements including comparison to any reports we may send to you.

Because our affiliate, LDL GP, LLC, serves as general partner of limited partnerships in which clients of LD Lowe Wealth Advisory invest, we are deemed to have custody of the assets of the partnerships. The assets of the partnerships are owned by each partnership itself, and the adviser will obtain from the general partner, and distribute to partners in the partnerships, financial statements that are audited by an independent public accountant that is registered with, and subject to regular inspection by, the Public Company Accounting Oversight Board.

Item 16 Investment Discretion

Unless otherwise negotiated, you have granted our Firm sole and absolute discretion in the management of your portfolio and periodic re-balancing to the asset class target percentages as outlined in the Clients Advisory Agreement except with respect to payment of the Firm's Fees. In the exercise of our authority, we are fully authorized and empowered to place orders to brokers, dealers, mutual funds, or other persons with respect to the purchase, sale, exchange, disposition or liquidation of any assets held in your portfolio

We have limited authority to sell or redeem securities holdings in sufficient amounts to pay advisory fees. You may reimburse the portfolio for Advisory Fees paid to us.

Item 17 Voting Client Securities

We do not vote your proxies and have instructed the Custodian to forward all proxy material directly to you. We shall forward to you, or to the Advisor(s) for an employee benefit plan covered by ERISA, unless the plan's trust agreement provides otherwise, any proxy materials we receive that pertain to the Assets in your Account. You can contact our office at 972-335-2523 for any questions about a particular solicitation.

Item 18 Financial Information

We do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. We do not have any financial condition that is reasonably likely to impair the ability to meet contractual commitments to you.

Item 19 Requirements for State Registered Advisers

Not applicable. We are an SEC registered investment adviser.

Part 2A Appendix 1 of Form ADV: Wrap Fee Program Brochure
Item 1 Cover Page

L.D. Lowe Wealth Advisory, Inc.

8330 LBJ Freeway Suite 500
Dallas, TX 75243
972-335-2523
www.idloweplan.com

This wrap fee program brochure provides information about the qualifications and business practices of LD Lowe Wealth Advisory, Inc. If you have any questions about the contents of this brochure, please contact us at the phone number or website listed above. 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 LD Lowe Wealth Advisory, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. Our registration as an Investment Adviser does not imply any certain level of skill or training.

March 30 2015

Item 2 Material Changes

SUMMARY OF CHANGES:

- None

Item 3 Table of Contents

Part 2A Appendix 1 of Form ADV: Wrap Fee Program Brochure

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Item 4 Services, Fees and Compensation

WEALTH MANAGEMENT SERVICES.

L.D Lowe Wealth Advisory, Inc. dba LD Lowe Wealth Advisory is a Registered Investment Advisory firm registered with the U.S. Securities and Exchange Commission (SEC). We provide Wealth Management Services to our discretionary accounts, which include a combination of investment management and financial planning services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and corporations and other business entities. We also assist you with the selection of money managers appropriate for the management of your portfolio. We may also provide investment advice on interests in partnerships, real estate, and REITs.

Our service constitutes an ongoing process by which:

- a) Your investment objectives, constraints and preferences are identified and specified;
- b) Your strategies are developed and implemented through a combination of financial assets;
- c) Capital market conditions and your circumstances are monitored; and
- d) Portfolio adjustments are made as appropriate to reflect significant changes to any or all of the above relevant variables.

Our portfolios are composed of stocks, mutual funds, REITs, ETFs, LPs, and Fixed Income Annuities aka Equity Index Annuities that we may use in your portfolio.

Financial Planning Services:

We may provide a comprehensive financial planning service. Financial planning services can simplify and determine financial and investment alternatives by:

1. Defining and narrowing a client's objectives and investment option,
2. Identifying areas of greatest concern,
3. Creating a picture of the client's overall financial situation, and
4. Providing an effective and efficient way for LD Lowe to address a client's unique financial needs and objectives.

Financial plans are based on your financial situation at the time the plan is presented. You are advised that certain assumptions may be made with respect to interest and inflation rates, as well as past trends, historical market performance, and the economy. Past performance is in no way an indication of future results. We cannot offer any guarantees or promises that your financial goals and objectives will be met. As your financial situation, goals, objectives, or needs change, you must promptly notify us.

Upon completion of the written financial plan, we will provide implementation services through our portfolio management services. We may also work in conjunction with your other professional advisers, e.g. accountant or legal. Under such arrangements, we will act as a project manager that coordinates the work of the appropriate parties in a manner consistent with your objectives. Implementation of the prepared plan or recommendations is solely at your discretion. We encourage you to utilize any desired professional or group of professionals to assist in the implementation.

Annual updates will be provided upon client request. Client is responsible for reporting to LD Lowe any life changing events.

Third Party Investment Adviser Selection:

We may recommend that you utilize the services of a Third Party Investment Adviser ("TPA") to manage your portfolio. We would recommend to you a TPA whose investment style is believed to be consistent with your financial needs, investment goals, tolerance for risk and stated investment objectives. Upon selection of a TPA, we will monitor the performance of the TPA to ensure their performance and investment style remains aligned with the investment goals and objectives. The TPA is granted discretionary authority by you to manage and invest your assets.

Clients who are referred to TPAs will receive full disclosure, including services rendered and fee schedules at

the time of the referral by delivery of a copy of the relevant TPA's brochure or equivalent disclosure document.

The Manager may impose a minimum dollar amount of initial client assets for the investment advisory services as disclosed in the management agreement. These minimums may be waived at the Manager's discretion. Clients will be provided the appropriate Manager's disclosure statement, in addition to the Manager's ADV Part2A Brochure and privacy policy, prior to placing the assets with the Manager.

Pension Consulting:

We will provide pension-consulting services to employee benefit plans, which includes 401(k) plans and their fiduciaries based upon an analysis of the needs of the plan. In general, these services may include an existing plan review, asset allocation advice, money management services, communication and education services where we will assist the plan sponsor in providing meaningful information regarding the retirement plan to its participants, investment performance monitoring, and/or ongoing consulting.

We may have agreements with Third Party Administrators to provide these services as part of the Third Party Administrator's agreement with the plan. In these instances, the Third Party Administrator may pay a portion of the fee charged to the plan to us for their services. In other instances, we may be introduced to a plan through a Third Party Administrator and will provide service directly to the plan.

Tax Preparation:

We refer clients requesting tax preparation services to CPA's. You will pay directly to CPA any costs relating to the tax preparation service that is not included in your management fee. The CPA reimburses us for the cost of mailing and labor for scanning documents. As such, the referral is not a conflict of interest as no monetary compensation is paid by either us or the CPA to the other party.

It is your responsibility to research and understand any legal or tax ramifications of any distributions you make from your accounts. We do not provide legal or tax advice. If you take a distribution from an IRA or an annuity with growth, and you are under 59 ½ years of age you will be penalized by the IRS if you do not qualify for an exception. It is your responsibility to determine if you qualify for an exception from this penalty.

We will withhold a minimum of 20% for federal income tax on all distributions from tax deferred accounts unless you direct otherwise.

Consulting Services:

You can also receive investment advice on a more limited basis. This may include advice on only an isolated area(s) of concern such as estate planning, retirement planning, or any other specific topic. We provide specific consultation services regarding your current or projected financial position or other

investment and financial concerns that you may have. Advice offered by LD Lowe may involve investments in mutual funds.

Philanthropic Counseling & Management:

We can assist you in defining your goals when pledging money or assets to a charitable cause. We also assist in investing and managing the pledged money or assets. Asset management fees will be charged for managing the pledged money or assets.

WEALTH MANAGEMENT SERVICES FEES AND COMPENSATION.

Our Wealth Management Services is a combination of our Financial Planning and Portfolio Management Services and is offered on a wrap fee basis. Under our Wrap Option, you will pay a single, all inclusive fee. It is based on all "assets under management" that have been recommended and invested by us. This includes all cash and cash equivalents held in your accounts. Wrap pricing allows you to pay an all- inclusive fee for management, brokerage, clearance, custody and administrative services. The above fees include but is not limited to the cost of:

- Trading including transaction costs, custodial fees etc.
- Research and investment management
- Financial, estate and risk management plus ongoing tracking
- Client meetings and phone calls.
- Preparation of your personal tax return (\$500k min assets under management)
- Preparation of basic estate documents (\$1mil min assets under management)

We will pay to TD Ameritrade the transaction/execution costs associated with the equity transactions. A potential disincentive to trade securities may be presented under this arrangement.

Assets Under Management		Annual Fee
\$0 - \$1 million	of Investment Assets	2.00%
\$1 - 2 million	of Investment Assets	1.50%
\$2 - 3 million	of Investment Assets	1.00%
Investment Assets exceeding	\$3,000,000	0.75%

Certain products are offered with a built-in concession that cannot be waived or reduced. The advisor fee also does not include transfer fees, or margin interest and for any commissions and any mark-ups/mark-downs on transactions directed to other broker/dealers as well as any specialized custodial account charges, such as IRA account fees. This amount may vary in special situations and will be disclosed to you. This confirmation charge is not included in the fee and will be charged by the custodian to your account in all but mutual fund wrap accounts.

Our advisory agents do not receive different compensation for our different company sponsored programs and thus there is not incentive to recommend one program over another. The wrap option program may cost you more or less than purchasing management and trading services separately. You may want to discuss your options with your advisor to determine the fee option that suits your needs.

Item 5 Account Requirements and Types of Clients

WEALTH MANAGEMENT SERVICES ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS.

Under the Wealth Management program preparation of your personal tax return requires \$500,000 minimum assets under management, and preparation of basic estate documents require \$1,000,000 minimum assets under management. We may make exception to this minimum from time to time based on individual factors such as length of time the account has been known, overall composition of the account, multiple accounts held with advisor etc. We manage accounts on a per household basis and the account minimum shall be based on the combined asset value of all household accounts. Below is an

asset breakdown for each of the investment models.

The types of clients that we provide investment advice to consists of individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

Item 6 Portfolio Manager Selection and Evaluation

WEALTH MANAGEMENT SERVICES ACCOUNT PORTFOLIO MANAGER SELECTION & EVALUATION:

Quarterly and annual reviews are provided to you to help you determine if your goal is being consistently attained. We evaluate individual portfolio managers in terms of performance goals and will replace managers as appropriate.

Item 7 Client Information Provided to Portfolio Managers

WEALTH MANAGEMENT SERVICES ACCOUNT CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGER:

Your income, net worth, risk tolerance, and investment goals are disclosed to our registered portfolio managers. Appropriate asset allocation and wrap fee participation are determined for you based on this information. Your investment goals and risk tolerance are confirmed in quarterly reviews and may be changed at your discretion.

Item 8 Client Contact with Portfolio Managers

WEALTH MANAGEMENT SERVICES ACCOUNT CLIENT CONTACT WITH PORTFOLIO MANAGERS:

Contact with our portfolio managers is not restricted, unless the contact is unusual in frequency or unrelated to normal business practices. Consultations beyond normal business practices may require additional negotiated fees.

Item 9 Additional Information

WEALTH MANAGEMENT SERVICES ACCOUNT DISCIPLINARY INFORMATION:

Our advisory agents do not have reportable legal disciplinary events that are disclosed on their registration history. Our Firm will disclosed any material facts about legal or disciplinary events so that you can determine whether they are material to your evaluation of the integrity of our firm or its advisory agents. Your confidence and trust placed in our Firm and its advisory agents is something we value and endeavor to protect.

A full report that reflects the professional background, business practices, and conduct of our advisory agents is available through the IARD link at www.adviserinfo.sec.gov. Should you have any technical difficulties with this link you can call 240-386-4848 for further assistance.

The information that appears on these websites is collected from individual investment adviser representatives, investment adviser firm(s), and/or securities regulator(s) as part of the securities industry's registration and licensing process.

WEALTH ASSET MANAGEMENT ACCOUNT OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS:

Advisory Agents of LD Lowe Wealth Advisory are also licensed insurance agents for various companies. If you elect to implement a plan through our advisory agents, they may receive a commission from insurance sales, which includes life, accident, disability, long term care, Medicare supplemental and fixed index annuities aka equity index annuities and fixed annuities. This presents a conflict of interest to the extent that the advisory agent recommends the purchase of an insurance product that results in a commission being paid to the advisory agent as an insurance agent. We have no single agreement with any agency or company, but will seek out the products of any company, agency or brokerage that may have products fitting your needs.

We may recommend to you to invest in alternative investments that may be suitable for your stated investment goals, risk temperament, and investment objectives. The alternative investments can range from short term to long term investment vehicles that have various investment objectives including revenue from the production of natural gas and/oil associated with those oil & gas royalty interests acquired for the fund, real estate interests, structured notes etc. Additional information for suggested alternative investment including a discussion of certain significant risks of investing will be disclosed in the related Private Placement Memorandum. Qualified persons should read the Memorandum carefully before investing.

WEALTH MANAGEMENT SERVICES ACCOUNT CODE OF ETHICS:

We have adopted a Code of Ethics Policy to prohibit conflicts of interest from personal trading by our advisory personnel and have established standards of conduct expected of our advisory personnel. We have set forth in the Code of Ethics Policy statements of general principals, required course of conduct, reporting obligations, and review and enforcement of the Code of Ethics Policy. We will provide a copy of the Code of Ethics Policy to our clients or prospective client's upon written request.

WEALTH MANAGEMENT SERVICES ACCOUNT PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING:

Our advisory agents and employees may, on occasion, have or take positions in securities that are being or have been recommended to you. Such investment positions are limited to passive, non-controlling interests in securities. These investment products will be bought and sold on the same basis as you buy them. We will transact your transactions and business before their own when similar securities are being bought or sold. In all instances, the positions would be so small as to have no impact on the pricing or performance of the security. We will do everything possible to mitigate these conflicts. Records of all advisory associate's proprietary trading activities are reviewed and kept by us. All personal securities transactions on behalf of our advisory agents, employees and employee-related accounts must be:

- Executed in an approved broker dealer account
- Pre-approved where required by our policies
- In compliance with our policies regarding inside and proprietary information, watch list, restricted list, holding period and other conflicts of interests

We and our advisory agents will act in a fiduciary manner, understand the prohibitions against the use of any insider information and will always act in your best interest.

WEALTH MANAGEMENT SERVICES ACCOUNT REVIEWS:

Account reviews will be provided quarterly, but at a minimum shall be reviewed annually or by your request. Reviews may be warranted more frequently due to tax law changes, market changes, market conditions or changes in your personal circumstances. Reviews initiated by you may be for personal objectives or for any reason you so desire.

Reviews will be conducted by Sharon Goldberg, CCO, and will be consistent with desires of you respecting

frequency and changing circumstances or objectives.

Statements, confirmations and/or performance reports are furnished monthly or quarterly from various financial services institutions/firms with which you transact business. These firms may include, and are not limited to, brokerages, investment companies, insurance companies, trust companies, other registered investment advisors, banks and credit unions. You will receive account statements from these entities and not our Firm. The monthly account statements from the custodian indicate activity, previous portfolio balances, current portfolio balances, and account summary. We may also assist you in interpreting and/or compiling statements or reports and transferring relevant information onto the appropriate place on your financial statements as part of our review process. We will provide to you periodic performance and fee notices in connection with your account. Fixed Index Annuities aka Equity Index Annuities and Life Settlement clients will receive statements directly from the applicable insurance company or provider.

WEALTH MANAGEMENT SERVICES ACCOUNT PAYMENT FOR CLIENT REFERRALS:

We do not have any arrangements to compensate another for client referrals.

WEALTH MANAGEMENT SERVICES ACCOUNT FINANCIAL INFORMATION:

We do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. We do not have any financial condition that is reasonably likely to impair the ability to meet contractual commitments to you.

Item 10 Requirements for State-Registered Advisers

Not applicable.