

CARDAN CAPITAL PARTNERS, LLC

a Registered Investment Adviser

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This brochure provides information about the qualifications and business practices of Cardan Capital Partners, LLC (hereinafter “Cardan Capital Partners” or the “Firm”). If you have any questions about the contents of this brochure, please contact the Firm at this telephone number 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 the Firm is available on the SEC’s website at www.adviserinfo.sec.gov. The Firm is a registered investment adviser. Registration does not imply any level of skill or training.

Item 2. Material Changes

In this Item, Cardan Capital Partners is required to discuss any material changes that have been made to the brochure since the last annual amendment. Each section of this brochure has materially changed since Ross Fox, Matt Papazian, Martha Awad and Sarah Keys became the owners of the Firm.

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Item 4. Advisory Business

Cardan Capital Partners offers a variety of advisory services, which include financial planning, consulting, and investment management services. Prior to Cardan Capital Partners rendering any of the foregoing advisory services, clients are required to enter into one or more written agreements with Cardan Capital Partners setting forth the relevant terms and conditions of the advisory relationship (the “Advisory Agreement”).

Cardan Capital Partners has been wholly owned by Ross Fox, Matt Papazian, Martha Awad and Sarah Keys since November 6, 2015. As of the date of this filing, Cardan Capital Partners does not have any assets under management; however, the Firm reasonably expects to be eligible for registration with the SEC shortly.

While this brochure generally describes the business of Cardan Capital Partners, certain sections also discuss the activities of its Supervised Persons, which refer to the Firm’s officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees or any other person who provides investment advice on Cardan Capital Partners’ behalf and is subject to the Firm’s supervision or control.

Financial Planning and Consulting Services

The Firm starts with an extensive review of a client’s family situation which includes assets and liabilities as well as estate, tax, and insurance needs. The Firm then employs a risk tolerance and risk capacity-focused simulation to get a detailed cash flow analysis and proposed allocation. Cardan Capital Partners employs some market views to come up with a proposed financial plan. The financial plan is a living breathing document which is revisited regularly.

Cardan Capital Partners’ financial planning and consulting services may include any or all of the following functions:

- Business Planning
- Cash Flow Forecasting
- Trust and Estate Planning
- Financial Planning
- Investment Consulting
- Insurance Planning
- Liability Management
- Risk Management
- Charitable Giving
- Distribution Planning
- Tax Planning
- Manager Due Diligence

While each of these services is available on a stand-alone basis, certain of them may also be rendered in conjunction with investment portfolio management as part of a comprehensive wealth management engagement (described in more detail below).

In performing these services, Cardan Capital Partners is not required to verify any information received from the client or from the client's other professionals (e.g., attorneys, accountants, etc.) and is expressly authorized to rely on such information. Cardan Capital Partners may recommend clients engage the Firm for additional related services, its Supervised Persons in their individual capacities as insurance agents or registered representatives of a broker-dealer and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists if clients engage Cardan Capital Partners or its affiliates to provide additional services for compensation. Clients retain absolute discretion over all decisions regarding implementation and are under no obligation to act upon any of the recommendations made by Cardan Capital Partners under a financial planning or consulting engagement. Clients are advised that it remains their responsibility to promptly notify the Firm of any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising Cardan Capital Partners' recommendations and/or services.

Wealth Management Services

Cardan Capital Partners provides clients with wealth management services which generally includes a broad range of comprehensive financial planning and consulting services as well as discretionary and/or non-discretionary management of investment portfolios.

Cardan Capital Partners primarily allocates client assets among various exchange-traded funds ("ETFs"), individual debt and equity securities, and mutual funds in accordance with their stated investment objectives. Cardan Capital Partners may also occasionally recommend clients allocate a certain portion of their assets to independent investment managers ("Independent Managers").

Where appropriate, the Firm may also provide advice about any type of legacy position or other investment held in client portfolios. Clients may engage Cardan Capital Partners to manage and/or advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance and annuity contracts and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, Cardan Capital Partners directs or recommends the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company or the custodian designated by the product's provider.

Cardan Capital Partners tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. Cardan Capital Partners consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the

management of their portfolios. Clients are advised to promptly notify Cardan Capital Partners if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients may impose reasonable restrictions or mandates on the management of their accounts if Cardan Capital Partners determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts.

Use of Independent Managers

As mentioned above, Cardan Capital Partners may select certain Independent Managers to actively manage a portion of its clients' assets. The specific terms and conditions under which a client engages an Independent Manager may be set forth in a separate written agreement with the designated Independent Manager. In addition to this brochure, clients may also receive the written disclosure documents of the respective Independent Managers engaged to manage their assets.

Cardan Capital Partners evaluates a variety of information about Independent Managers, which may include the Independent Managers' public disclosure documents, materials supplied by the Independent Managers themselves and other third-party analyses it believes are reputable. To the extent possible, the Firm seeks to assess the Independent Managers' investment strategies, past performance and risk results in relation to its clients' individual portfolio allocations and risk exposure. Cardan Capital Partners also takes into consideration each Independent Manager's management style, returns, reputation, financial strength, reporting, pricing and research capabilities, among other factors.

Cardan Capital Partners continues to provide services relative to the discretionary or non-discretionary selection of the Independent Managers. On an ongoing basis, the Firm monitors the performance of those accounts being managed by Independent Managers. Cardan Capital Partners seeks to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests.

Item 5. Fees and Compensation

Cardan Capital Partners offers services on a fee basis, which may include fixed fees, as well as fees based upon assets under management or advisement. Additionally, certain of the Firm's Supervised Persons, in their individual capacities, may offer securities brokerage services and/or insurance products under a separate commission-based arrangement.

Financial Planning and Consulting Fees

Cardan Capital Partners may charge a fixed fee for providing financial planning and consulting services under a stand-alone engagement. These fees are negotiable, but generally range from \$1,000 to \$20,000, depending upon the scope and complexity of the services and the professional rendering the financial planning and/or the consulting services. If the client engages the Firm for additional investment advisory services, Cardan Capital Partners may offset all or a portion of its fees for those services based upon the amount paid for the financial planning and/or consulting services.

The terms and conditions of the financial planning and/or consulting engagement are set forth in the Advisory Agreement and Cardan Capital Partners generally requires one-half of the fee (estimated hourly or fixed) payable upon execution of the Advisory Agreement. The outstanding balance is generally due upon delivery of the financial plan or completion of the agreed upon services. The Firm does not, however, take receipt of \$1,200 or more in prepaid fees in excess of six months in advance of services rendered.

Wealth Management Fees

Cardan Capital Partners offers investment management services for an annual fee based on the amount of assets under the Firm's management. This management fee generally varies between 40 and 200 basis points (0.40% – 2.00%), depending upon the size and composition of a client's portfolio and the type of services rendered.

The annual fee is prorated and charged monthly, in advance, based upon the market value of the assets being managed by Cardan Capital Partners on the last day of the previous billing period. If assets are deposited into or withdrawn from an account after the inception of a billing period, the fee payable with respect to such assets is adjusted to reflect the interim change in portfolio value. For the initial period of an engagement, the fee is calculated on a *pro rata* basis. In the event the advisory agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding or unearned portion of the fee is charged or refunded to the client, as appropriate.

Additionally, for asset management services the Firm provides with respect to certain client holdings (e.g., held-away assets, accommodation accounts, alternative investments, etc.), Cardan Capital Partners may negotiate a fee rate that differs from the range set forth above.

Fee Discretion

Cardan Capital Partners may, in its sole discretion, negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship, account retention and pro bono activities.

Additional Fees and Expenses

In addition to the advisory fees paid to Cardan Capital Partners, clients may also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively “Financial Institutions”). These additional charges may include securities brokerage commissions, transaction fees, custodial fees, fees charged by the Independent Managers, margin or other borrowing costs, charges imposed directly by a mutual fund or ETF in a client’s account, as disclosed in the fund’s prospectus (*e.g.*, fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. The Firm’s brokerage practices are described at length in Item 12, below.

Direct Fee Debit

Clients generally provide Cardan Capital Partners with the authority to directly debit their accounts for payment of the investment advisory fees. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to Cardan Capital Partners.

Account Additions and Withdrawals

Clients may make additions to and withdrawals from their account at any time, subject to Cardan Capital Partners’ right to terminate an account. Additions may be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or declines to accept particular securities into a client’s account. Clients may withdraw account assets on notice to Cardan Capital Partners, subject to the usual and customary securities settlement procedures. However, the Firm generally designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client’s investment objectives. Cardan Capital Partners may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, short-term redemption fees, fees assessed at the mutual fund level (*e.g.*, contingent deferred sales charges) and/or tax ramifications.

Commissions and Sales Charges for Recommendations of Securities

Clients can engage certain persons associated with Cardan Capital Partners (but not the Firm directly) to render securities brokerage services under a separate commission-based arrangement. Clients are under no obligation to engage such persons and may choose brokers or agents not affiliated with Cardan Capital Partners.

Under this arrangement, the Firm's Supervised Persons, in their individual capacities as registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS"), may provide securities brokerage services and implement securities transactions under a separate commission based arrangement. Supervised Persons may be entitled to a portion of the brokerage commissions paid to PKS, as well as a share of any ongoing distribution or service (trail) fees from the sale of mutual funds. Cardan Capital Partners may also recommend no-load or load-waived funds, where no sales charges are assessed. Prior to effecting any transactions, clients are required to enter into a separate account agreement with PKS.

A conflict of interest exists to the extent that Cardan Capital Partners recommends the purchase or sale of securities where its Supervised Persons receive commissions or other additional compensation as a result of the Firm's recommendation. The Firm has procedures in place to ensure that any recommendations made by such Supervised Persons are in the best interest of clients. For certain accounts covered by the Employee Retirement Income Security Act of 1974 ("ERISA") and such others that Cardan Capital Partners, in its sole discretion, deems appropriate, Cardan Capital Partners may provide its investment advisory services on a fee-offset basis. In this scenario, Cardan Capital Partners may offset its fees by an amount equal to the aggregate commissions and 12b-1 fees earned by the Firm's Supervised Persons in their individual capacities as registered representatives of PKS.

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

Cardan Capital Partners does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client's assets).

Item 7. Types of Clients

Cardan Capital Partners offers services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and business entities.

Cardan Capital Partners does not impose a stated minimum fee or minimum portfolio value for starting and maintaining an investment management relationship.

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

Methods of Analysis

Cardan Capital Partners utilizes a combination of fundamental, technical, and economic methods of analysis.

Fundamental analysis involves an evaluation of the fundamental financial condition and competitive position of a particular fund or issuer. For Cardan Capital Partners, this process typically involves an analysis of an issuer's management team, investment strategies, style drift, past performance, reputation and financial strength in relation to the asset class concentrations and risk exposures of the Firm's model asset allocations. A substantial risk in relying upon fundamental analysis is that while the overall health and position of a company may be good, evolving market conditions may negatively impact the security.

Technical analysis involves the examination of past market data rather than specific issuer information in determining the recommendations made to clients. Technical analysis may involve the use of mathematical based indicators and charts, such as moving averages and price correlations, to identify market patterns and trends which may be based on investor sentiment rather than the fundamentals of the company. A substantial risk in relying upon technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that Cardan Capital Partners will be able to accurately predict such a reoccurrence.

Economic analysis is similar to technical analysis in that it involves the assessment of market conditions at a macro (entire market or economy) or micro (company specific) level, rather than focusing on the overall fundamental analysis of the health of the particular company that Cardan Capital Partners is recommending. The risks with economic analysis are similar to those of technical analysis.

Investment Strategies

Core Equity

Investment Objective: Growth. The objective is to accumulate wealth over time through price appreciation rather than current income. Clients should be willing to accept the risk of price volatility and the principal loss in seeking to achieve growth.

Investment Strategy Description: This strategy seeks to provide growth. Cardan Capital Partners may select for the strategy an allocation of domestic equities, developed international equities, emerging market equities, and taxable fixed income. The strategy may also have exposure to equities of varying market capitalizations. This exposure will generally be implemented through ETFs, individual securities, and mutual funds, although the instruments used to implement the strategy may change from time to time. The

strategy may also hold cash and cash equivalents, the allocation of which may vary depending on various factors, including market conditions and account liquidity needs. The strategy will, at times, have exposure to American Depositary Receipts.

Core Moderate

Investment Objective: Total Return. The objective is to strike a balance between current income and growth. Despite the relatively balanced nature of the portfolio, clients should be willing to assume the risk of price volatility and principal loss.

Investment Strategy Description: This strategy seeks to provide Total Return. Cardan Capital Partners may select for the strategy an allocation of domestic equity, developed international equities, emerging market equities, and taxable fixed income. The strategy may also have exposure to high yield bonds, equities of varying market capitalizations, government bonds, corporate bonds, and agency bonds. This exposure will generally be implemented through ETFs, individuals securities, and mutual funds, although the instruments used to implement the strategy may change from time to time. The strategy may also hold cash and cash equivalents, the allocation of which may vary depending on various factors, including market conditions and account liquidity needs. The strategy will, at time have exposure to international markets through investments in American Depositary Receipts.

Dynamic Asset Class

Investment Objective: Total Return. The objective is to strike a balance between current income and growth. Despite the relatively balanced nature of the portfolio, clients should be willing to assume the risk of price volatility and principal loss.

Investment Strategy Description: This strategy seeks to provide Total Return. Cardan Capital Partners may select for the strategy an allocation of domestic equities, developed international equities, alternative investments funds, and taxable fixed income. The strategy may also have exposure to high yield bonds and equities of varying market capitalizations. This exposure will generally be implemented through exchange traded funds, although the instruments used to implement this strategy may change from time to time. The strategy may also hold cash and cash equivalents, the allocation of which may vary depending on various factors, including market conditions and account liquidity needs. The strategy will, at times, have exposure to international, commodity and other types of ETFs to position the portfolio for total return.

Dynamic Balanced

Investment Objective: Total Return. The objective is to strike a balance between current income and growth. Despite the relatively balanced nature of the portfolio, clients should be willing to assume the risk of price volatility and principal loss.

Investment Strategy Description: This strategy seeks to provide Total Return. Cardan Capital Partners may select for the strategy an allocation of domestic equities, developed international equities, alternative investments funds, taxable fixed income, and international fixed income. The strategy may also have exposure to high yield bonds, equities of varying market capitalizations, corporate bonds, government bonds, and agency bonds. This exposure will generally be implemented through exchanged traded funds and mutual funds, although the instruments used to implement the strategy may change from time to time. The strategy may also hold cash and cash equivalents, the allocation of which may vary depending on various factors, including market conditions and account liquidity needs. The strategy will, at times, have exposure to international, commodity and other types of ETFs to position the portfolio for total return.

Dynamic Moderate

Investment Objective: Total Return. The objective is to strike a balance between current income and growth. Despite the relatively balanced nature of the portfolio, clients should be willing to assume the risk of price volatility and principal loss.

Investment Strategy Description: This strategy seeks to provide Total Return. Cardan Capital Partners may select for the strategy an allocation of domestic equities, developed international equities, alternative investments funds, and taxable fixed income. The strategy may also have exposure to high yield bonds and equities of varying market capitalizations. This exposure will generally be implemented through exchange traded funds and mutual funds, although the instruments used to implement the strategy may change from time to time. The strategy may also hold cash and cash equivalents, the allocation of which may vary depending on various factors, including market conditions and account liquidity needs. The strategy will, at times, have exposure to international, commodity and other types of ETFs to position the portfolio for total return.

ETF Equity Income (Equity Dividend)

Investment Objective: Total Return. The objective is to strike a balance between current income and growth. Despite the relatively balanced nature of the portfolio, clients should be willing to assume the risk of price volatility and principal loss.

Investment Strategy Description: This strategy seeks to provide Total Return. Cardan Capital Partners may select for the strategy an allocation of domestic equities, developed international equities, emerging market equities, and taxable fixed income. The strategy may also have exposure to government bonds. This exposure will generally be implemented through exchange traded funds, although the instruments used to implement the strategy may change from time to time. The strategy also hold cash and cash equivalents, the allocation of which may vary depending on various factors, including market conditions and account liquidity needs.

Income Portfolio

Investment Objective: Income: The objective is to obtain a continuing stream of income from investments. In order to satisfy current yield requirements, clients should be willing to accept the risk of principal loss.

Investment Strategy Description: This strategy seeks to provide Income. Cardan Capital Partners may select for the strategy an allocation of domestic equities, alternative investment funds, taxable fixed income, and tax-exempt fixed income. The strategy may also have exposure to high yield bonds. This exposure will generally be implemented through exchange traded funds and mutual funds, although the instruments used to implement the strategy may change from time to time. The strategy may also hold cash and cash equivalents, the allocation of which may vary depending on various factors, including market condition and account liquidity needs.

Municipal Bond Portfolio

Cardan Capital Partners seeks to capture the most attractive yields of municipal securities. Cardan Capital Partners will primarily invest in exchange traded funds, as well as mutual funds, in order to participate in what the Firm believes to be the best value in the market across maturities and credit qualities. At times, the Firm may take positions in search for these values with the high yield municipal market, and will do some via an ETF to maximize diversification within that space. The portfolio is managed with tax free income as the primary purpose with capital appreciation as a secondary concern.

There may be additional strategies and objectives utilized currently and in the future. The preceding have been provided as the most common strategies and objectives utilized as of this filing and for illustrative purposes.

Risk of Loss

Market Risks

Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The profitability of a significant portion of Cardan Capital Partners' recommendations and/or investment decisions may depend to a great extent upon correctly assessing the future course of price movements of stocks, bonds and other asset classes. There can be no assurance that Cardan Capital Partners will be able to predict those price movements accurately or capitalize on any such assumptions.

Mutual Funds and ETFs

An investment in a mutual fund or exchange traded fund involves risk, including the loss of principal. Mutual fund and exchange traded fund shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes

on any fund-level capital gains, as mutual funds and exchange traded funds are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

Shares of exchange traded funds are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, exchange traded fund shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed based exchange traded funds and potentially more frequently for actively managed exchange traded funds. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an exchange traded fund only redeems shares when aggregated as creation units (usually 20,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular exchange traded fund, a shareholder may have no way to dispose of such shares.

Use of Independent Managers

As stated above, Cardan Capital Partners may select certain Independent Managers to manage a portion of its clients' assets. In these situations, Cardan Capital Partners continues to conduct ongoing due diligence of such managers, but such recommendations rely to a great extent on the Independent Managers' ability to successfully implement their investment strategies. In addition, Cardan Capital Partners generally may not have the ability to supervise the Independent Managers on a day-to-day basis.

Item 9. Disciplinary Information

Cardan Capital Partners has not been involved in any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of its management.

Item 10. Other Financial Industry Activities and Affiliations

This item requires investment advisers to disclose certain financial industry activities and affiliations.

Registered Representatives of a Broker/Dealer

Certain of the Firm's Supervised Persons are registered representatives of PKS and may provide clients with securities brokerage services under a separate commission-based arrangement. This arrangement is described at length in Item 5.

Licensed Insurance Agents

A number of the Firm's Supervised Persons are licensed insurance agents and may offer certain insurance products on a fully-disclosed commissionable basis. A conflict of interest exists to the extent that Cardan Capital Partners recommends the purchase of insurance products where its Supervised Persons may be entitled to insurance commissions or other additional compensation. The Firm has procedures in place whereby it seeks to ensure that all recommendations are made in its clients' best interest regardless of any such affiliations.

Relationship with Dynasty Financial Partners, LLC

Cardan Capital Partners maintains a business relationship with Dynasty Financial Partners, LLC ("Dynasty"), which provides the Firm with operational and back office support including access to a network of service providers. Through the Dynasty network of service providers, Cardan Capital Partners has access to trading technology, transition support, reporting, custody, brokerage, investments, compliance and other related services. The Firm may also engage and/or recommend Dynasty's subsidiary, Dynasty Wealth Management LLC, a registered investment adviser, to clients for certain outsourced investment services, such as separate account management, asset allocation strategies and externally managed investment programs. While Cardan Capital Partners believes this open architecture structure for both operational and investment services best serves the interests of its advisory clients, this relationship may potentially present certain conflicts of interest due to the fact that Dynasty retains a portion of the platform or other third party fees paid by the Firm or clients for the services referenced above. In light of the foregoing, Cardan Capital Partners seeks at all times to ensure that any material conflicts are addressed on a fully-disclosed basis and handled in a manner that is aligned with its clients' best interests. Cardan Capital Partners does not receive any portion of the fees paid directly to Dynasty, its affiliates or the service providers made available through Dynasty's platform. In addition, the Firm reviews all such relationships, including the service providers engaged through Dynasty, on an ongoing basis in an effort to ensure clients are receiving competitive rates in relation to the quality and scope of the services provided.

Item 11. Code of Ethics

Cardan Capital Partners has adopted a code of ethics in compliance with applicable securities laws (“Code of Ethics”) that sets forth the standards of conduct expected of its Supervised Persons. Cardan Capital Partners’ Code of Ethics contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by the Firm or any of its Supervised Persons and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

The Code of Ethics also requires certain of Cardan Capital Partners’ personnel to report their personal securities holdings and transactions and obtain pre-approval of certain investments (*e.g.*, initial public offerings, limited offerings). However, the Firm’s Supervised Persons are permitted to buy or sell securities that it also recommends to clients if done in a fair and equitable manner that is consistent with the Firm’s policies and procedures. This Code of Ethics has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by certain personnel to be completed without any appreciable impact on the markets of such securities. Therefore, under limited circumstances, exceptions may be made to the policies stated below.

When the Firm is engaging in or considering a transaction in any security on behalf of a client, no Supervised Person will access to this information may knowingly effect for themselves or for their immediate family (*i.e.*, spouse, minor children and adults living in the same household) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the Supervised Person is completed as part of a batch trade with clients; or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers’ acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

Clients and prospective clients may contact Cardan Capital Partners to request a copy of its Code of Ethics.

Item 12. Brokerage Practices

Recommendation of Broker/Dealers for Client Transactions

Cardan Capital Partners generally recommends that clients utilize the custody, brokerage and clearing services of Schwab Advisor Services™ (“Schwab”) for investment management accounts. Factors which Cardan Capital Partners considers in recommending Schwab or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. Schwab may enable the Firm to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by Schwab may be higher or lower than those charged by other Financial Institutions.

The commissions paid by Cardan Capital Partners’ clients to Schwab comply with the Firm’s duty to obtain “best execution.” Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction where Cardan Capital Partners determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution’s services, including among others, the value of research provided, execution capability, commission rates and responsiveness. Cardan Capital Partners seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

Transactions may be cleared through other broker-dealers with whom the Firm and its custodians have entered into agreements for prime brokerage clearing services. Should an account make use of prime brokerage, the Client may be required to sign an additional agreement, and additional fees are likely to be charged.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker/dealers in return for investment research products and/or services which assist Cardan Capital Partners in its investment decision-making process. Such research generally will be used to service all of the Firm’s clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client’s portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because Cardan Capital Partners does not have to produce or pay for the products or services.

Cardan Capital Partners periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to obtain best execution.

Software and Support Provided by Financial Institutions

Cardan Capital Partners may receive without cost from Schwab computer software and related systems support, which allow Cardan Capital Partners to better monitor client accounts maintained at Schwab. Cardan Capital Partners may receive the software and related support without cost because the Firm renders investment management services to clients that maintain assets at Schwab. The software and support is not provided in connection with securities transactions of clients (i.e., not “soft dollars”). The software and related systems support may benefit Cardan Capital Partners, but not its clients directly. In fulfilling its duties to its clients, Cardan Capital Partners endeavors at all times to put the interests of its clients first. Clients should be aware, however, that Cardan Capital Partners’ receipt of economic benefits from a broker/dealer creates a conflict of interest since these benefits may influence the Firm’s choice of broker/dealer over another that does not furnish similar software, systems support or services.

Specifically, Cardan Capital Partners may receive the following benefits from Schwab:

- Credits to be used toward qualifying third-party service providers used in connection with the initial set up of the Firm’s research, technology and software platforms;
- Receipt of duplicate client confirmations and bundled duplicate statements;
- Access to a trading desk that exclusively services its institutional traders;
- Access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and
- Access to an electronic communication network for client order entry and account information.

Brokerage for Client Referrals

Cardan Capital Partners does not consider, in selecting or recommending broker/dealers, whether the Firm receives client referrals from the Financial Institutions or other third party.

Directed Brokerage

The client may direct Cardan Capital Partners in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution and the Firm will not seek better execution services or prices from other Financial Institutions or be able to “batch” client transactions for execution through other Financial Institutions with orders for other accounts managed by Cardan Capital Partners (as described above). As a result, the client may pay higher commissions or other transaction costs, greater spreads or may receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty

of best execution, Cardan Capital Partners may decline a client's request to direct brokerage if, in the Firm's sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Trade Aggregation

Transactions for each client generally will be effected independently, unless Cardan Capital Partners decides to purchase or sell the same securities for several clients at approximately the same time. Cardan Capital Partners may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Firm's clients differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among Cardan Capital Partners' clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that the Firm determines to aggregate client orders for the purchase or sale of securities, including securities in which Cardan Capital Partners' Supervised Persons may invest, the Firm generally does so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. Cardan Capital Partners does not receive any additional compensation or remuneration as a result of the aggregation.

In the event that the Firm determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, the Firm may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

Item 13. Review of Accounts

Account Reviews

Cardan Capital Partners monitors client portfolios on a continuous and ongoing basis while regular account reviews are conducted on at least a quarterly basis. Such reviews are conducted by the Firm's Principals and/or investment adviser representatives. All investment advisory clients are encouraged to discuss their needs, goals and objectives with Cardan Capital Partners and to keep the Firm informed of any changes thereto. The Firm contacts ongoing investment advisory clients at least annually to review its previous services and/or recommendations and quarterly to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Account Statements and Reports

Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions where their assets are custodied. From time-to-time or as otherwise requested, clients may also receive written or electronic reports from Cardan Capital Partners and/or an outside service provider, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. Clients should compare the account statements they receive from their custodian with any documents or reports they receive from Cardan Capital Partners or an outside service provider.

Item 14. Client Referrals and Other Compensation

Cardan Capital Partners does not compensate any parties (affiliated or unaffiliated) for referring clients to the Firm.

Item 15. Custody

The Advisory Agreement and/or the separate agreement with any Financial Institution generally authorize Cardan Capital Partners and/or the Independent Managers to debit client accounts for payment of the Firm's fees and to directly remit that those funds to the Firm in accordance with applicable custody rules. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to Cardan Capital Partners.

In addition, as discussed in Item 13, Cardan Capital Partners may also send periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the Financial Institutions and compare them to those received from Cardan Capital Partners.

Item 16. Investment Discretion

Cardan Capital Partners may be given the authority to exercise discretion on behalf of clients. Cardan Capital Partners is considered to exercise investment discretion over a client's account if it can effect and/or direct transactions in client accounts without first seeking their consent. Cardan Capital Partners is given this authority through a power-of-attorney included in the agreement between Cardan Capital Partners and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). Cardan Capital Partners takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold;
- When transactions are made; and
- The Independent Managers to be hired or fired.

Item 17. Voting Client Securities

Declination of Proxy Voting Authority

Cardan Capital Partners generally does not accept the authority to vote a client's securities (i.e., proxies) on their behalf. Clients receive proxies directly from the Financial Institutions where their assets are custodied and may contact the Firm at the contact information on the cover of this brochure with questions about any such issuer solicitations.

Item 18. Financial Information

Cardan Capital Partners is not required to disclose any financial information due to the following:

- The Firm does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of services rendered;

- The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.