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**This brochure contains information about the investment processes and business practices of Frontier Asset Management, LLC (“Frontier”) as well as information about the backgrounds and qualifications of Frontier’s personnel. If you have any questions about the contents of this brochure, please contact us at (307) 673-5675 or [info@frontierasset.com](mailto:info@frontierasset.com).**

**The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Frontier is registered as an investment adviser with the SEC; however, such registration does not imply a certain level of skill or training and no inference to the contrary should be made.**

**Additional information about Frontier is also available at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).**

## Item 2: Summary of Material Changes

Since the last update of this document, which was dated September 7, 2016, there have been the following material changes to this Form ADV Part 2A and 2B:

1. Frontier has added a section entitled “Sub-advisor Services” to Item 4.
2. Frontier has updated its Assets under the heading Frontier’s Advisory Business under Item 4.
3. Under Item 5 we have outlined the fee structure for Sub-Advisor Services.
4. A paragraph describing possible event sponsorships is included in Item 10.
5. As of January 2017, Frontier has relocated its main office in Sheridan, Wyoming. We are now located at 50 East Loucks Street, Suite 201.

Since the last annual update of this document, which was dated March 22, 2017, there have been the following material changes to this Form ADV Part 2A and 2B:

1. Catherine S. Teichert, CSCP-IA®, has been appointed Chief Compliance Officer.
2. Charles Burgess, CFA, resigned from Frontier Asset Management.

Pursuant to federal regulations, Frontier will ensure that clients receive a summary of any material changes to this Brochure within 120 days of the close of the firm’s fiscal year, along with a copy of this brochure or an offer to provide a copy of the brochure. Frontier’s brochure is available anytime upon request or at the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Brochure Part 2A

### Item 4: Advisory Business

**We are investment strategy management specialists.** Frontier's primary business is managing investment strategies for the clients of a select group of independent financial advisors. We also provide investment consulting services to financial advisors and institutional clients. We accept a limited number of direct advisory clients.

**We are highly experienced.** Frontier was founded in 2000 by Gary A. Miller, CFA. Mr. Miller began managing investment strategies composed of mutual funds in 1987. Our firm is managed by a seasoned team of industry veterans. We have managed investment strategies through a wide range of market environments.

**We are independent and objective.** Our firm is majority owned and controlled by its management. Together, Gary A. Miller, CFA (Founding Principal and Chief Investment Officer), Jeremy van Arkel, CFA (Principal) and Robert E. Miller, CFA (Managing Principal) own 89% of the firm.

Our advice is objective. We do not offer proprietary products. As fiduciaries, we put the interests of our clients before our own. Frontier is registered as an investment advisor with the Securities and Exchange Commission under the Investment Advisers Act of 1940. Registration does not imply a certain level of skill or training.

**We offer a variety of investment strategies.** Each investment strategy is managed within a specified framework of return objectives and limits on risk. This allows clients, working with their financial advisors, to select an investment strategy that is consistent with their goals, preferences and tolerance for risk.

Frontier's investment strategies can be divided into two categories. The Globally Diversified strategies are constructed using a wide range of asset classes and are designed to satisfy the "core strategy" needs of investors at defined risk levels. There are minimum and maximum constraints placed on the percentage of assets that can be allocated to 5 major asset class groups.

Alternative Strategies may be broadly diversified, but since there are no asset class constraints on our Alternative Strategies, they may, at times, be more narrowly concentrated than our Globally Diversified strategies.

Most of our investment strategies consist entirely of open-end mutual funds. We also offer a range of Exchange Traded Funds (ETFs) strategies. On request, we may create customized investment strategies for clients and/or use other investment vehicles, such as Separate Accounts, Variable Annuities and Money Markets, in our investment strategies. We offer our investment strategies on both a discretionary and a model basis.

Please refer to the section below titled "Methods of Analysis, Investment Strategies and Risk of Loss" for further information about our investment strategies.

**Discretionary Accounts – Joint Advisory.** We enter into an investment advisory agreement with the client and the client’s financial advisor. Both Frontier and the client’s financial advisor serve as fiduciaries to the client under this agreement, which means they are required to put the client’s interests before their own.

Frontier’s primary responsibility is to manage the client’s assets on a discretionary basis. This means that Frontier initiates transactions in the client’s account without prior approval. Frontier initiates these transactions directly through the independent custodian that holds the client’s assets.

Every quarter we prepare performance reports to help clients assess the value of our services and measure progress toward their goals. These reports show clients where they stand and help them stay on track.

We offer tax managed strategies. Tax benefits will vary depending upon market conditions and each client’s individual tax situation. We believe clients will benefit from this service over most time periods. The goal is to reduce the taxes paid on taxable investment strategy accounts, any further tax advice should be discussed with a certified public accountant.

Frontier also offers billing services for its discretionary accounts. Through this service, Frontier automatically collects its fee and the advisor’s fee directly from the client’s account and distributes the advisor’s portion to the advisor. Please see the Fees and Compensation and Custody sections for additional information.

The client’s financial advisor serves as the client’s investment advisor and consultant. In that role, the advisor provides services such as:

- helping the client identify long-term goals and investment objectives
- developing an investment strategy to achieve those goals and objectives
- determining the ongoing suitability of Frontier’s services for the client
- helping the client assess the performance of the client’s account
- interacting directly with Frontier on client’s behalf

The financial advisor may provide other services to the client as agreed between the advisor and the client.

**Model Investment Strategies.** Frontier provides model investment strategies to investment advisory firms, which, in turn, offer our model investment strategies to their clients. We do not enter into direct relationships with, or serve as fiduciaries to, these clients. Instead, we serve as a strategist to the firms that offer our model investment strategies and are paid a fee by them.

As a strategist, Frontier periodically recommends purchase and sale transactions with respect to the management of the model investment strategies. The firms that offer our models are solely responsible for implementing all trading activity that Frontier recommends. They are also responsible for providing all administrative and performance reporting services to their clients.

**Consulting Services.** Frontier provides investment consulting services to financial advisors and institutional clients. Our consulting services include advice relating to a broad range of investment issues such as asset allocation, manager selection, investment strategy design and construction, performance measurement and development of investment policy statements.

**Advisory Accounts.** On occasion, Frontier accepts advisory clients and manages accounts for those clients on a discretionary basis. These relationships are typically limited to “friends and family” situations, charitable organizations that request Frontier’s services or existing Frontier clients whose financial advisor is no longer able or willing to service the client’s account. Frontier also accepts advisory clients based on a solicitor arrangement relationship.

**Sub-Advisor Services.** Frontier provides sub-advisor services to investment advisors. In these arrangements, Frontier oversees investment strategies on a discretionary basis for clients of the Advisor. Both parties act as fiduciaries in the relationship. Investment strategies are managed and monitored on an ongoing basis.

**Assets.** Frontier Asset Management offers asset-class allocation and investment management services directly to investing clients as well as through other independent Registered Investment Advisers, Model Investment Strategy Providers and Subadvisors and their respective clients. Collectively, Advisory clients of Frontier, clients of Independent Registered Investment Advisers, clients of Model Investment Strategy Providers and clients of Subadvisors are referred to as Client(s). As of December 31, 2016, Frontier oversaw total assets of \$2,291,411,623.02 for Clients. Discretionary Assets are those accounts where Frontier is authorized to make purchases and sales of investment vehicles for the account without obtaining prior approval from the client or the client’s financial advisor. Some Client accounts are administered on a Non-Discretionary basis pursuant to instructions received from either the Client or Model Strategy Provider. Frontier also has some Unmanaged accounts to which Frontier does not trade or manage.

Discretionary	\$956,328,341.64
Non-Discretionary	\$1,317,032,836.00
Unmanaged	\$18,050,445.38
\$2,291,411,623.02	

## Item 5: Fees and Compensation

**Discretionary Accounts – Joint Advisory – Mutual Fund Investment Strategies.** Our annual fees for managing mutual fund strategies on a discretionary basis for the clients of financial advisors are:

Account Value	Investment Management
The first \$500,000	0.50%
Next \$500,000 up to \$1,000,000	0.30%
Next \$4,000,000 up to \$5,000,000	0.25%
Above \$5,000,000	0.20%

The minimum account size is \$100,000. The first-tier investment management fee for accounts invested in our Short-Term Reserve investment strategy is 0.30%.

Our tax management services are offered at no additional fee for tax sensitive accounts. Tax Aware services are offered for accounts with less than \$250,000 in assets and full Tax Management services are available for accounts over \$250,000.

Frontier offers a “householding” fee agreement for clients that have more than one advisory discretionary strategy account with Frontier under the same household (same physical address). In calculating the fees for household accounts the assets in all accounts will be combined to determine the total fee then it will be allocated proportionately to each account. The minimum average for each account is \$100,000.

**Discretionary Accounts – Joint Advisory – ETF Strategies.** Our annual fees for managing ETF strategies on a discretionary basis for the clients of financial advisors are:

Account Value	Investment Management
The first \$500,000	0.50%
Next \$500,000 up to \$1,000,000	0.30%
Next \$4,000,000 up to \$5,000,000	0.25%
Above \$5,000,000	0.20%

The minimum account size is \$20,000. We do not offer tax management for ETF accounts.

The financial advisors that provide investment advisory and consulting services to clients charge a fee for their services. That fee is established solely by the financial advisor and usually is set forth separately in the investment advisory agreement among Frontier, the advisor and the client.

Typically, Frontier collects both its fee and the financial advisor’s fee from the client’s account and distributes the advisor’s fee to the advisor. In certain situations, where the financial advisor is affiliated with a broker-dealer, Frontier may pay a portion of its fee to the broker-dealer to compensate the broker-dealer for administrative, supervisory and marketing costs it incurs in connection with these relationships.

**Discretionary Accounts – Direct Advisory Accounts.** Frontier’s annual fees for advisory accounts are:

Account Value	Investment Management
The first \$500,000	1%
Next \$500,000 up to \$1,000,000	0.8%
Next \$1,000,000 up to \$2,000,000	0.6%
Above \$2,000,000	0.5%

Frontier is committed to providing discretionary investment management services only through independent financial advisors. In very limited circumstances, Frontier provides advisory, discretionary services to “friends and family,” charitable organizations and existing clients whose financial advisor is no longer willing or able to service their account. There is a minimum account size of \$100,000.

Frontier does not provide many of the consulting and advisory services typically provided by financial advisors, such as financial and estate planning. Frontier charges lower fees to clients who access its services through financial advisors.

There is no additional charge for our optional Tax Management services for advisory accounts with assets over \$250,000. The goal is to reduce the taxes paid on taxable investment strategy accounts, any further tax advice should be discussed with a certified public accountant.

### Model Investment Strategies.

Since the level of investment management effort and day-to-day operational activity is typically less for model-based relationships than for discretionary relationships, the fees for model-based relationships are usually lower than those for discretionary relationships. The annual fees for model-based relationships range from 0.20% to 0.40% of assets under management. The fees are based on account size so there is no set minimum or maximum fee.

### Consulting Services.

The annual fees charged in connection with consulting relationships vary depending upon the number of models provided, the amount of effort required to create the models, the size and nature of the relationship and the level of service required. Frontier's fees for consulting services also may be charged on a fixed fee or hourly basis and vary depending upon the nature and scope of the relationship. For example, Registered Investment Advisor Consulting clients are charged a flat fee based on the services provided. These may include, asset allocations for model strategies and other proprietary research related services. Fees are determined on a case by case basis.

Sub-Advisor Services. Frontier's annual fees for investment consulting relationships are:

Account Value	Investment Management
First \$20M	0.50%
Next \$30M up to \$50M	0.25%
Over \$50M	0.20%

Sub-Advisor fees are based on assets under management of the sub-advisor client.

### Additional Information About Our Fees

For discretionary and advisory investment management relationships, Frontier generally requires payment in advance at the beginning of each calendar quarter. Through the investment advisory agreement, clients provide Frontier with authority to invoice the client's custodian directly for payment of our management fees. We typically notify the client's custodian of the fee amount for each account shortly after the beginning of each quarter, based on the value of the account on the last day of the preceding quarter. The custodian debits the fees from the client's account(s) and deposits the funds into a designated fee account that Frontier maintains at



the custodian. Frontier then distributes the fees to the Advisor and Frontier. Sub-advisory fees are invoiced on a quarterly basis in advance.

Clients will receive a periodic (at least quarterly) account statement from the custodian, reflecting among other things, any fees withdrawn by the custodian and paid to Frontier. Clients are urged to review statements received by their custodian for accuracy. For more information on the reports Frontier provides to our clients, please refer to the “Review of Accounts” section below.

In limited circumstances, Frontier may honor requests to directly bill a client for Frontier’s fees rather than having the fees deducted automatically from the account. There is an annual charge of \$100 for this direct bill service. Frontier invoices the client separately for this fee.

For accounts that start during a quarter, Frontier charges a prorated fee for the partial quarter. The prorated fee is based on the value of the account on the first day when we begin to manage the account. Occasionally, there is a delay between when an account is opened and when we begin to manage it. For example, when securities are transferred from several accounts or custodians it may take time for the account to be whole and in this instance, we would generally wait for all assets to be in the account prior to beginning to manage the account.

Discretionary and advisory relationships are generally terminable at any time by the client. Prorated fee refunds are given for accounts that are terminated during a quarter for unearned fees paid in advance of services. Refunds are automatically made to the client’s account (if Frontier still has access to it) or are sent to the client’s address of record. Calculation of prorated refunds is based on the last day that Frontier takes any action relating to the management or administration of the account.

For model-based and investment consulting relationships, the timing and procedures for payment and for termination of the relationship vary and are negotiated based on the nature, scope and type of relationship involved.

None of the above fees include brokerage or custodial fees that may be charged by a custodian. Nor do they include transaction fees and redemption charges associated with purchases and sales of mutual funds for the account.

The mutual funds and ETFs purchased for client accounts charge internal management fees and incur expenses that are deducted from the assets of the fund and therefore borne by the shareholders of the mutual funds and ETFs. The fees also may include distribution fees and sales charges. These fees and expenses are in addition to Frontier’s fees and fees charged by the client’s Financial Advisor. Refer to the fund prospectus for the amount of these fees and expenses.

Lower fees for comparable services may be available from other advisers. Our fees may be negotiated or changed by Frontier at the sole discretion of the Firm. We reserve the right to waive or reduce our investment management fee and account size minimums with respect to any account, including but not limited to accounts for our employees and/or family members. Some of the factors relevant to charging different fees are the account size, the investment strategy, the type of client, and the nature of the relationship between the potential client and Frontier. Fees may be higher for additional level of services.

## Item 6: Performance-Based Fees

Frontier does not charge any performance-based fees or fees based on a share of capital gains or capital appreciation of the assets in an account.

## Item 7: Types of Clients

Frontier manages taxable and non-taxable accounts for affluent individuals and retirement accounts such as 401(k) and profit-sharing plans.

Frontier provides investment management and consulting services to financial advisors and institutional clients, including endowments, foundations, corporations and other investment advisory organizations.

Frontier manages accounts that vary greatly in size. As of December 31, 2016, Frontier's largest discretionary client had assets of over \$65 million and its smallest accounts were under \$100,000.

Frontier's minimum account size for discretionary and advisory investment management relationships is \$100,000 for mutual fund accounts and \$20,000 for ETF accounts. Minimums for model-based programs are established by the program sponsor. Minimums are subject to negotiation and Frontier reserves the right to waive the minimum or accept or decline a potential client for any reason in its sole discretion.

If a Client's account is a pension or other employee benefit plan governed by the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), Frontier may be a fiduciary to the plan. In providing our investment management services, the sole standard of care imposed upon us is to act with the care, skill, prudence and diligence under the circumstances then prevailing that a prudent man acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims. We will provide certain required disclosures to the "responsible plan fiduciary" (as such term is defined in ERISA) in accordance with Section 408(b)(2), regarding the services we provide and the direct and indirect compensation we receive by such clients. Generally, these disclosures are contained in this Form ADV Part 2A, the client agreement and/or in separate ERISA disclosure documents, and are designed to enable the ERISA plan's fiduciary to: (1) determine the reasonableness of all compensation received by Frontier; (2) identify any potential conflicts of interests; and (3) satisfy reporting and disclosure requirements to plan participants.

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

Frontier constructs a wide variety of investment strategies for its clients. Each strategy is managed within a specified framework of return objectives and limits on risk. All strategies that are managed by Frontier on a discretionary basis are available in a tax-sensitive version, excluding our ETF strategies. Many Frontier strategies are also offered as Christian Worldview investment strategies, which are managed from a biblically responsible perspective. The strategies are listed below:

**Globally Diversified:** Global Opportunities; Long-Term Growth; Growth & Income; Balanced; Conservative; Income; Capital Preservation.

**Alternative Strategies:** Focused Opportunities; Absolute Return Plus; Absolute Return; Short-Term Reserve.

**ETF Strategies:** Long-Term Growth; Growth & Income; Balanced; Conservative; Capital Preservation

**Asset Allocation.** Frontier believes strongly in the benefits of investment strategy diversification. We attempt, through asset allocation strategies, to achieve the return targets of our investment strategies while controlling or limiting the volatility in the strategy.

The first step in our process is determining which types of investments, or “asset classes,” we will use in constructing our investment strategies. Currently (as of September 7, 2016), the list of asset classes we use includes the following:

US Large Stocks	Real Estate Investment Trusts
US Small Stocks	Floating Rate Securities
International Large Stocks	US High Quality Bonds
International Small Stocks	US High Yield Bonds
Emerging Markets Stocks	Long-Term Government Bonds
Managed Futures	International Bonds
Commodities	TIPS
Absolute Return	Treasury Bills

Many asset classes contain sub-groups that we can also use to our advantage in building investment strategies. For example, US Large Stocks and US Small Stocks have “growth” and “value” subgroups with different performance characteristics.

We don’t use all asset classes and sub-groups in all investment strategies. We use only those we believe are appropriate given the strategy’s investment objectives.

Next we establish our long-term asset allocation strategy. That strategy is based on our estimates of the future long-term return and risk characteristics of each asset class and the relationships among their performance patterns.

As the investment environment changes, we alter the asset allocation strategy to reflect those changes. We have developed quantitative models that tell us when allocation adjustments may be appropriate. These models focus on long-term future asset class return, risk and correlation expectations.

For our Globally Diversified strategies we set asset allocation ranges for each of 5 major asset class groups. We take these ranges into account in making allocation adjustments.

**Mutual Fund Selection.** Most of Frontier’s investment strategies are constructed using mutual funds. We believe that mutual funds give us access to many of the world’s best money managers at a reasonable cost. They are highly liquid and allow us to achieve broad market diversification in a very efficient manner. We also believe mutual funds are generally more stable relative to many other investments.

Frontier's mutual fund selection process relies on qualitative and quantitative factors. The goal of this process is to identify mutual fund managers who are highly skilled and who we believe can, when combined with other managers in an investment strategy, contribute to achieving the investment objectives of that strategy.

The heart of our quantitative process is our use of returns-based style analysis. Style analysis helps us establish a unique performance benchmark for each manager. We believe these benchmarks help us determine which managers have added value in the past and have the requisite skills to do so in the future.

Our qualitative process helps us identify characteristics that we believe are important in good managers. The goal is to identify managers who:

- have experience managing assets in various market environments
- will act in the best interest of our clients
- are passionate about investing
- manage assets using a unique strategy
- are flexible in their approach
- charge a reasonable fee for their services
- are highly motivated to generate results that will benefit our clients

Of course, not all the managers we select have all of these qualities, but we look for managers with as many of them as possible.

Once we have identified a group of mutual funds that are eligible for inclusion in our investment strategies, we use a proprietary process to combine them. This process is designed to create an investment strategy of funds whose respective investment styles and approaches will complement each other over time. Frontier believes that properly combining mutual funds in a strategy is an important factor that has the potential to contribute to a strategy's success in achieving its investment objectives.

Once Frontier has established the asset allocation strategy, selected mutual funds and combined them in an investment strategy, it monitors the strategy and the funds in the strategy. We may make adjustments to our asset allocation strategy and/or replace funds in an investment strategy when we believe adjustments are advisable.

There are always risks when it comes to investing. Securities such as mutual funds and ETFs rise and fall in value based on many factors. There is no guarantee that Frontier's investment strategies will achieve their investment objectives. We attempt to limit declines in our investment strategies, but their performance is highly dependent on the performance of the securities markets. Clients should be prepared for the possibility of losses.

**ETF Selection.** The ETFs utilized in these strategies are index based, meaning they attempt to mimic an index that is being used to represent each asset class. The ETFs that we use are liquid and allow us to achieve broad market diversification. The criteria for consideration are quantitative in nature:

- The ETF must have a minimum of \$100,000,000 invested and a track record of 3 years.
- The ETF must track its asset class benchmark to a high statistical degree.

- For each asset class used Frontier considers both the internal expense ratio and the brokerage fees associated with trading each ETF.

**Summary of Frontier's Tax Management Process.** All taxable accounts receive these services with no additional fee.

- We analyze the tax-sensitivity of each fund and use that information as a variable in our optimization process. A tax-sensitive portfolio may look different than a non-taxable portfolio, depending on the tax-sensitivity of the funds.
- We shift the asset allocation of taxable accounts to asset classes that are more tax-efficient.
- We rarely realize short-term gains. We may delay the liquidation of a fund if it would result in a short-term gain.
- We use muni-bond funds in taxable accounts, unless otherwise instructed.

Full Tax Sensitive Management is offered at no additional cost for accounts over \$250K.

- Our trading program incorporates taxes into its logic on both an individual account and a model strategy basis. We only trade when the expected added value exceeds the anticipated tax cost. When we choose to delay a trade, we review the client's account daily to see when the trade will be most beneficial.
- We look for tax-loss harvesting opportunities throughout the year - not just at year's end. Except in unusual circumstances, we automatically sell any fund that has fallen 15% in value and replace it with a similar fund.
- We monitor anticipated capital gains distributions and try to avoid large payouts. We may delay purchasing a fund that is about to make a capital gains distribution, or we may sell a fund that is about to make a large distribution (if the sale makes sense from a tax perspective) and substitute another fund.
- We trade taxable accounts on a "specific lot" basis to maximize tax benefits.

Tax management services are not available through model provider relationships where Frontier does not have discretion over account management.

## Material Risks

Investing in securities involves a significant risk of loss. Frontier's investment strategies invest in asset classes and investment vehicles that are subject to various market, currency, economic, political and business risks, and such investment decisions may not always be profitable. Clients should be aware that there may be a loss or depreciation to the value of the client's account, which clients should be prepared to bear. There can be no assurance that a client's investment objectives will be obtained and no inference to the contrary should be made. Clients are advised that they should only commit assets for management that can be invested for the long term, that volatility from investing can occur, and that all investing is subject to risk and consequently, the value of the client's account may at any time be worth more or less than the amount invested.

More specific risk associated with Frontier's assets classes and investment vehicles that clients should be aware of include, but are not limited, to the following:

- **Market Risk:** The price of a stock, bond, mutual fund or other security may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances.
- **Credit Risk:** The risk that a portfolio could lose money if the issuer or guarantor of a fixed income security, or the counterparty to a derivative contract, is unable or unwilling to meet its financial obligations.
- **High Yield Risk:** High yield securities and unrated securities of similar credit quality (commonly known as "junk bonds") are subject to greater levels of credit and liquidity risks.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Interest-Rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Political and Legislative Risk:** Companies face a complex set of laws and circumstances in each country in which they operate. The political and legal environment can change rapidly and without warning, with significant impact, especially for companies operating outside of the United States or those companies who conduct a substantial amount of their business outside of the United States.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. Generally, business risk is that a company will go bankrupt or perform below expectations. Every company carries the business risk that it will produce insufficient cash flow in order to maintain operations. Business risk can come from a variety of sources, some systemic and others unsystemic. That is, every company has the business risk that the broader economy will perform poorly and therefore that sales will be poor, and also the risk that the market simply will not like its products.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Derivatives Risk:** This is the risk of investing in derivative instruments, including liquidity, interest rates, market, credit and management risks, mispricing or improper valuations. Changes in the value of the derivative may not correlate perfectly with the underlying asset, rate or index and the investment could lose more than the principal amount invested.
- **Foreign Investment Risk:** Investments in foreign securities may be riskier than U.S. investments because of factors such as, unstable international, political and economic conditions, currency fluctuations, foreign controls on investment and currency exchange, foreign governmental control of some issuers, potential confiscatory taxation or nationalization of companies by foreign governments, withholding taxes, a lack of adequate company information, less liquid and more volatile exchanges and/or markets, ineffective or detrimental government regulation,

varying accounting standards, political or economic factors that may severely limit business activities, and legal systems or market practices that may permit inequitable treatment of minority and/or non-domestic investors. Investments in emerging markets may involve these and other significant risks such as less mature economic structures and less developed and more thinly-traded securities markets.

It is important to note that while Frontier recommends investing for the long-term, certain mutual funds or ETFs recommended by us may employ high-frequency trading. As a result, such frequent trading may result in increased brokerage and other transaction costs, which generally could reduce investment returns over time. For detailed information on the risks associated with investing in the mutual funds or ETFs invested in by Frontier, please refer to the funds' prospectuses or other equivalent disclosure documentation.

## Item 9: Disciplinary Information

Frontier maintains high standards of ethics and integrity for its employees.

Neither Frontier, nor any of its employees:

- has ever been the subject of any legal, administrative or disciplinary action by any governmental or regulatory authority
- has ever been the subject of any lawsuit or proceeding brought by a client or financial advisory firm
- has ever been the subject of any criminal proceeding

## Item 10: Other Financial Industry Activities and Affiliations

Frontier's only business is providing investment management and consulting services to its clients. Frontier is majority owned and controlled by its management. Frontier serves as a fiduciary to its clients, which means that it puts its clients' interests before its own.

Frontier does not receive any payments or compensation, either directly or indirectly, from any of the mutual funds or ETFs that it purchases for its clients. All purchases and sales for client accounts are based solely on Frontier's consideration of the clients' best interests.

Frontier receives payments from the custodian, Fidelity, based on the amount of "no-transaction fee funds" ("NTF funds") held in Frontier client accounts. These "revenue sharing" payments represent a return of a portion of the fee that the fund company pays Fidelity to participate in its "no-transaction fee" program.

The amount of these payments varies depending on the amount of assets held in custody at Fidelity by Frontier clients. Currently, the amount is calculated and paid quarterly at an annual rate of 0.15% of all NTF mutual funds held in Frontier client accounts, but the payments could rise or decline if the assets held at Fidelity by Frontier clients increases or decreases.

Frontier credits these amounts to its clients as an off-set against its investment management fees. Frontier does not consider these payments when determining which funds to purchase for client accounts.

Occasionally, Frontier accepts sponsorship for advisor related events. Sponsors may be custodians, mutual fund companies or third party service providers. Sponsors attend the event in order to educate and present to advisors. Frontier does not in any way use their sponsorship or participation as a determination in how we select investment vehicles for our strategies. We give no preferential treatment to those that sponsor or attend and those that do not. Frontier is not affiliated with any potential sponsors.

## Item 11: Code of Ethics, Conflicts of Interest and Personal Trading

Frontier has adopted a Code of Ethics in compliance with Rule 204A-1 under the Investment Advisers Act of 1940, as amended, which is contained in Frontier's Rules of Conduct. All Frontier employees are subject to its Rules of Conduct, which sets standards of behavior that are intended to establish a high level of professionalism, integrity and fair dealing with clients. All Frontier employees are subject to its provisions.

Under its Rules of Conduct, Frontier allows employees to maintain personal securities accounts at any broker-dealer. They are free to initiate trades in those accounts without prior review or approval, except in the case of any transactions of private limited offerings, purchases of IPOs and the ETFs we use in our strategies which require preclearance from our Compliance department. They are permitted to purchase mutual funds for their accounts that are purchased by Frontier for client investment strategies.

Employees are not allowed to:

- trade on inside information
- "front-run" or trade in anticipation of client transactions
- engage in trading activity prohibited under the federal securities laws
- engage in transactions that conflict with our clients' best interests

Employees are required to provide reports of their securities holdings and transactions on a periodic basis. These reports are reviewed by the firm's compliance personnel.

A copy of Frontier's Rules of Conduct is available to any client or prospective client upon request. Requests should be directed to Frontier at the address shown on page 1 of this brochure.



## Privacy Policy

### FACTS

#### WHAT DOES FRONTIER ASSET MANAGEMENT, LLC DO WITH YOUR PERSONAL INFORMATION?

##### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

##### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and investment experience
- Account balances and transaction history
- Assets and income
- Personal contact information including email

When you are *no longer* our customer, we continue to share your information as described in this notice.

##### How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Frontier Asset Management, LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Frontier Asset Management, LLC share?	Can you limit this sharing?
For our everyday business purposes—such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes—to offer our products and services to you	No	We do not share
For joint marketing with other financial companies	No	We do not share
For our affiliates' everyday business purposes—information about your transactions and experiences	No	We do not share
For our affiliates' everyday business purposes—information about your creditworthiness	No	We do not share
For our affiliates to market to you	No	We do not share
For nonaffiliates to market to you	No	We do not share

##### Questions?

Call 307.673.5675 or go to [www.frontierasset.com](http://www.frontierasset.com)

What we do	
How does <b>Frontier Asset Management, LLC</b> protect my personal information?	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p> <p>We also maintain other physical, electronic and procedural safeguards to protect this information and we limit access to information to those employees for whom access is appropriate.</p>
How does <b>Frontier Asset Management, LLC</b> collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>■ open an account or register for our services</li> </ul>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <b>Frontier Asset Management, LLC has no affiliates</b></li> </ul>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <b>Frontier Asset Management, LLC does not share with nonaffiliates so they can market to you</b></li> </ul>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ <b>Frontier Asset Management, LLC does not jointly market</b></li> </ul>

## Item 12: Brokerage Practices

Frontier manages accounts on a discretionary basis for many of its clients. That means that Frontier can buy and sell securities for the client without obtaining permission for each transaction prior to initiating it.

Frontier has adopted trading policies and procedures to help ensure that it lives up to its fiduciary duties and duty of fairness to its clients. These policies and procedures serve as guidelines for all Frontier employees in the management and trading of discretionary accounts and model investment strategies.

Our specialty is trading mutual funds at the custodial firms where our clients maintain their accounts. We do our best trading other types of securities, but we have no special expertise in those areas.

Most of the trades we execute are initiated internally as part of our investment strategy management responsibilities. We make no effort to time the market or guess the direction of the market in the short-term in executing trades. When advisors provide specific trading instructions relating to an account, we use reasonable efforts to execute them as directed.

Frontier initiates transactions for discretionary accounts through the broker or custodian selected by the client to maintain that account. Brokers and custodians provide trading and custody services for clients.

Most investment strategies managed by Frontier consist of mutual funds. All mutual funds purchased for client accounts will be purchased without any “sales load” or commission. This means neither Frontier nor any of its employees receives any payment from the mutual fund company in connection with the purchase of mutual fund shares.

Some mutual funds purchased for client accounts are available on a “transaction-fee” basis. That means that the broker or custodian through which Frontier purchases or sells the fund charges the client a fee in connection with the transaction. Frontier does not receive any portion of these fees.

Other mutual funds purchased for client accounts are purchased on a “no-transaction fee” basis. That means they can be purchased and sold without the imposition of any transaction fee. We call these “no-transaction fee funds.”

Because ETFs price intraday, unlike mutual funds, Frontier handles the trading of these accounts in a different manner. Frontier uses limit orders based on the most recent quoted market price available to us in an effort to protect against violent market movements that may affect executed order prices negatively. Furthermore, for the most part Frontier uses block orders when trading a security across multiple accounts in order to allow that all accounts receive the same execution price. If a block order is not filled, it is prorated across accounts and then Frontier attempts to fill the remained of the block the following day.

Many Frontier clients maintain their accounts at Fidelity. No-transaction fee funds that sell their shares through Fidelity pay Fidelity a fee to participate in Fidelity’s “no-transaction fee” program. Fidelity, in turn, pays a portion of that fee to Frontier whenever it buys no-transaction fee funds for client accounts.

In some cases, Frontier credits clients with the fees received from Fidelity. This credit is applied against Frontier’s investment management fee. Frontier is not influenced by, and does not consider, the receipt of these payments in determining which funds to purchase for client accounts.

Frontier does not have the authority to determine which brokers or custodians its clients use or the fees that they charge. Frontier may decline to manage an account that is maintained at any broker or custodian with which it does not have an existing relationship.

Frontier does recommend brokers/custodians to its discretionary account clients. Some examples include Fidelity, Schwab, Pershing, TD Ameritrade and LPL. We base our recommendations on a number of factors, including:

- cost to the client
- quality and cost of trade execution
- skill and experience of the broker/custodian
- quality of monthly statements and online access
- ease of use and operational efficiency for Frontier
- availability of mutual funds through the broker/custodian
- level and responsiveness of service to Frontier and our clients
- the value or benefit of other services or support provided to Frontier

These services are generally offered to investment advisors that manage accounts through these brokers/custodians. The offering of these services to Frontier may present a potential conflict of interest. Frontier believes that its recommendations are always made in the client's best interest.

Discretionary accounts are traded on an individual account basis and trades are not aggregated. This allows us to trade each account in the manner most appropriate for each client. We believe this is a benefit to our clients.

We do not trade model-based investment strategies. Rather, we provide information to the firms that offer our models about how they should be traded. Those firms are then solely responsible for implementation of those instructions. Frontier does not monitor or supervise the trading activity of these firms.

## Item 13: Review of Accounts

Each investment strategy managed by Frontier is monitored on a daily basis to determine if it falls within certain asset class and mutual fund tolerance levels established for each investment strategy. Investment strategies may fall outside established tolerances for reasons such as market movements, client contributions or withdrawals. Adjustments are made to bring investment strategies back within established tolerances when they are deemed beneficial.

These reviews are conducted by the investment strategy management team, which consists of seven people. The team is supervised by Robert E. Miller, CFA, and Managing Principal. The team includes three portfolio associates and four Relationship Managers, who have supervisory responsibility for all accounts (approximately 3,200 accounts, as of December 31, 2016).

The review process is highly automated. Investment strategy tolerance levels are monitored by Frontier's proprietary computer systems. All trades are reviewed and approved by members of the investment strategy management team.

Frontier's Investment Committee has four voting members: Gary A. Miller, CFA; Jeremy van Arkel, CFA; and Robert E. Miller, CFA. Committee meetings are generally attended by one or more members of the investment strategy management team.

The Investment Committee designs and reviews the models for each investment strategy managed by Frontier. We review our model investment strategies periodically (at least once a month) to determine whether their allocations to various asset classes and mutual funds should be adjusted.

In these reviews, we consider a number of factors. These include the expected risk/return characteristics of an asset class, our assessment of the advisability of investing in a particular mutual fund and our assessment of whether a different combination of managers would provide better performance characteristics for the investment strategy in the future.

Once Frontier determines that a client's account should be traded or a request to initiate trading in a client account is received, Frontier executes all trades on a "best efforts" basis. We do not guarantee that trades will be initiated or settled within a particular time period or at a particular price.

Frontier provides quarterly performance reports for most of the accounts it manages on a discretionary basis. These reports detail transactions in each account, cash flows into and out of each account, asset allocation information and investment strategy holdings. They also outline performance over various time periods in absolute terms and relative to appropriate benchmarks.

Frontier also authors periodic market commentary and makes available performance information relating to its investment strategies. These performance updates are not client-specific. They are provided to financial advisors, not clients.

Custodians that hold client assets provide statements to the clients at least on a quarterly basis. Their content varies by custodian, but in all cases will include the deduction of advisory fees from the accounts. The custodians are not affiliated with Frontier and Frontier does not monitor or supervise their activity.

## Item 14: Client Referrals and Other Compensation

Frontier enters into joint advisory agreements with financial advisors and their clients. These joint advisory agreements call for Frontier to manage assets for those clients and call for the financial advisors to perform certain other investment advisory and consulting services for those clients.

Frontier's fees are set forth in the joint advisory agreement. In most cases and in all new agreements, the financial advisor's fees are separately stated in that agreement too, although occasionally they are combined with Frontier's fees. Frontier has several preexisting agreements where fees are combined based on past requests from advisors. Usually, Frontier collects its fees and the advisor's fees from the client's account and then distributes the advisor's fee to the advisor.

Frontier does not pay any portion of its stated fee to the advisor and the advisor does not pay any portion of its stated fee to Frontier. If the financial advisor is affiliated with a broker-dealer, Frontier may pay a portion of its fee to the broker-dealer to cover certain administrative, supervisory and marketing costs incurred by the broker-dealer in connection with the joint advisory relationship.

We believe that our fees are fair and reasonable for the services we provide. Although we have no role in establishing the fees charged by the financial advisors we work with, we believe that these financial advisors set their fees based on the reasonable value of the services they provide.

Sometimes Frontier pays individuals or organizations for client referrals. In such cases, Frontier will make full disclosure of the payments to the client being referred and the payments will be made in compliance with Rule 206(4)-3 under the Investment Advisers Act of 1940. As of December 31, 2016, Frontier had four such arrangements.

## Item 15: Custody

Based on the adopted amendment to the custody rule 206(4)-2 under the Investment Advisers Act of 1940, Frontier is considered to have custody of client assets by virtue of having the authority to withdraw our advisory fees and the Advisor's fees from client accounts. Frontier does not have authority or ability to withdraw client assets for any other reason and we do not maintain physical custody of client assets.

Client assets are held in one or more accounts with a qualified custodian of the client's choosing. The qualified custodian distributes account statements to the client at least quarterly, which reflect among other things the amount of all advisory fees deducted from a client's account. Frontier urges clients to compare the statements they receive from custodians, with statements and/or account reports received by Advisors and Frontier.

## Item 16: Investment Discretion

Many Frontier accounts are managed on a discretionary basis. This means that Frontier has the authority to purchase and sell securities for the account without obtaining prior approval.

Discretionary trading authority is granted to Frontier through the investment advisory agreement it enters into with each client. This authority is implemented through a Limited Power of Attorney that is executed by each client and provided to the client's broker or custodian.

Clients may place special restrictions or limitations on Frontier's discretionary authority. To be effective, such restrictions or limitations must be in writing and must be specifically agreed to by Frontier. Frontier may decline to manage an account based on requested restrictions or limitations on its trading authority.

## Item 17: Voting Client Securities

Unless otherwise requested by a client, Frontier votes all proxies for securities over which it has discretion. Frontier attempts to vote proxies in a manner that is in the best interest of the client for whom they are voted.

When Frontier obtains discretion over securities that are transferred into an account with the understanding that Frontier will sell them, it is our policy to abstain from voting them. In the rare case that we receive a proxy for a security over which we do not have discretion, it is our policy to forward the proxy to the investment advisor or other individual who has discretion over that security or use reasonable efforts to seek direction about how to vote the proxy.

In the event that Frontier identifies a potential conflict between its interests and those of a client with respect to the voting of a proxy, Frontier will notify and seek guidance from the client, through that client's investment advisor. In the event Frontier does not receive timely direction or guidance regarding the voting of the proxy, Frontier will abstain from voting the proxy.

Clients may request a copy of Frontier's full Proxy Voting Policy and/or the specific details of any proxy that was voted for their account by contacting us using the information on page 1 of this brochure. A copy of our Proxy Voting Policy is available on our web site at [www.frontierasset.com](http://www.frontierasset.com).

## Item 18: Financial Information

No financial information is provided with this document.

## Brochure Part 2B

### Item 2: Educational Background and Business Experience

The following provides information about the background and qualifications of Frontier's Investment Committee members. Unless otherwise indicated, all individuals may be contacted at the address and telephone number shown on the cover of this brochure.

**GARY A. MILLER, CFA**, born in 1953, is the Founding Principal and Chief Investment Officer of Frontier Asset Management. He also serves as the Chairman of Frontier's Investment Committee.

Mr. Miller has been managing investment strategies of mutual funds since 1987. He is recognized as a developer and the first practitioner to use returns-based style analysis to evaluate managers and design diversified investment strategies. He has been constructing investment strategies utilizing these techniques since 1988.

In 1987, Mr. Miller co-founded Optima Funds Management, an investment advisory firm specializing in managing investment strategies of mutual funds. In 1995 ADAM Investment Services purchased Optima and he became Chief Investment Officer of ADAM and LCG Associates, an affiliated pension consulting firm. Mr. Miller became Chief Investment Officer of Portfolio Management Consultants, ("PMC") a leading provider of investment services to independent financial advisors, when PMC purchased ADAM in 1997. Mr. Miller joined The Private Consulting Group as Chief Investment Officer in 1999. He subsequently founded Frontier in 2000.

Mr. Miller earned his MS in Management in 1985, concentrating in Investment Management, from the Georgia Institute of Technology, where he was a Presidential Fellow. He did graduate work in Engineering, Mathematics, and Systems Science at California Polytechnic State University and Portland State University. He earned his BS in Environmental Resources Engineering from Humboldt State University in 1975. He is a Chartered Financial Analyst charter holder and a member of the CFA Institute.

Mr. Miller is supervised by Robert E. Miller, Managing Principal. He can be reached at 307.673.5675

**GEREMY VAN ARKEL, CFA**, born in 1969, is a Principal of Frontier Asset Management. He is a member of the firm's Investment Committee. Mr. van Arkel works in the Atlanta office located at 1355 Peachtree Street, Suite 750, Atlanta, Georgia 30309. He can be contacted at 404-406-4281.

Mr. van Arkel specializes in mutual fund and manager due diligence and investment strategies management. He has also worked extensively with investment strategies diversification and global asset allocation techniques.

Mr. van Arkel joined Optima Funds Management in 1993 where he worked with Gary Miller doing research and analysis related to the management of mutual fund investment strategies. When Optima was purchased by ADAM Investment Services in 1995 he joined ADAM, continuing his work on the management of mutual fund investment strategies. When ADAM was purchased by Portfolio



Management Consultants (“PMC”) in 1997 he joined PMC and eventually became Manager of Investment Analysis. He joined Frontier in 2002.

Mr. van Arkel earned his BBA in Finance from Stetson University in 1993 with a concentration in Investments and completed the prestigious Roland George investment program. He is a Chartered Financial Analyst charter holder and a member of the CFA Institute.

Mr. van Arkel is supervised by Robert E. Miller, Managing Principal. Mr. Miller can be reached at 307.673.5675

**ROBERT E. MILLER, CFA**, born in 1977, is the Managing Principal of Frontier Asset Management. He is a member of the firm’s Investment Committee. He has been involved in the management of mutual fund strategies since 1999.

In 1998 Mr. Miller began his work in financial services at Portfolio Management Consultants where he worked with Gary Miller as an intern Investment Analyst. In 1999 he joined the Private Consulting Group as an Asset Allocation Analyst. He joined Frontier in 2000 at the time of its founding.

Mr. Miller earned his BA in Economics from Whitman College in 1999 with a minor in Computer Science. He is a Chartered Financial Analyst charter holder and a member of the CFA Institute and the CFA Society of Colorado.

Mr. Miller is Frontier’s Managing Principal and is supervised by the Owners. You may contact the main office at 307.673.5675 to reach one of the Owners.

***The CFA Designation.*** All members of Frontier’s Investment Committee are Chartered Financial Analyst charter holders. Attaining this designation involves a rigorous process. A CFA charter candidate must have four years of qualified investment work experience, become a member of the CFA Institute, pledge to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct on an annual basis and apply for membership to a local CFA member society. In addition, each candidate must pass three, six-hour examinations covering a wide range of investment topics. Completing the program typically takes between two and five years. For more information visit [www.cfainstitute.org](http://www.cfainstitute.org).

### Item 3: Disciplinary Information

Frontier maintains high standards of ethics and integrity for its employees. None of the individuals named above has been the subject of any legal or disciplinary proceedings relating to their activities in the investment management business.

### Item 4: Other Business Activities

The individuals named above are full-time employees of Frontier. None are engaged in any ongoing investment-related business activities for which they are compensated or which would otherwise create any conflict of interest. None receive any compensation or material economic benefit from any outside

organization and none are compensated by Frontier based on the amount of sales, client referrals or new accounts opened by the firm.

## Item 5: Additional Compensation

The individuals named above are full-time employees of Frontier. None are engaged in any ongoing investment-related business activities for which they are compensated or which would otherwise create any conflict of interest. None receive any compensation or material economic benefit from any outside organization and none are compensated by Frontier based on the amount of sales, client referrals or new accounts opened by the firm.

## Item 6: Supervision

Frontier's Investment Committee meets periodically and approves all significant investment-related decisions. Gary A. Miller, CFA serves as Chairman of the Investment Committee. Trading of client accounts is carried out by the investment strategies team managed by Robert E. Miller, CFA.