

Concorde Asset Management, LLC

Form ADV –Appendix 1 Wrap Fee Brochure

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This wrap fee program brochure (this “Brochure”) provides information about the qualifications and business practices of Concorde Asset Management, LLC. If you have any questions about the contents of this Brochure, please contact us at (248) 824-6710. 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.

We are a registered investment adviser. Registration of an adviser does not imply any level of skill or training.

Additional information about us also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2: Summary of Material Changes

This section would summarize material changes that have been made to our brochure since the date of its last version. However, this is the first version of this brochure and thus there have been no changes.

Item 3: Table of Contents

Item 2: Summary of Material Changes	2
Item 4: Services, Fees and Compensation	4
Introduction.....	4
Our Services.....	4
Our Fees and Fee Comparison.....	7
Item 5: Account Requirements and Types of Clients	11
Account Requirements	11
Types of Clients.....	11
Item 6: Portfolio Manager Selection and Evaluation	12
Advisory Business	12
Participation in Wrap Fee Programs.....	12
Performance-Based Fees and Side-By-Side Management	12
Methods of Analysis, Investment Strategies and Risk of Loss.....	12
Investment Strategies.....	13
Types of Investments and Risk of Loss	14
Investment Risks and Rewards	16
Voting Client Securities.....	18
Item 7: Client Information Provided to Portfolio Managers	18
Item 8: Client Contact with Portfolio Managers.....	18
Item 9: Additional Information	18
Disciplinary Information	18
Other Financial Industry Activities and Affiliations	18
Our Affiliated Broker-Dealer.....	18
Relationships or Arrangements Material to our Advisory Business.....	19
Our Affiliated Insurance Agency.....	19
Our Affiliated Accounting and Tax Service	19
Our Recommendation of Other Investment Advisers.....	19
Our Other Financial Industry Activities	19
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	20
Review of Accounts	21
Client Referrals and Compensation.....	21
Financial Information	21

Item 4: Services, Fees and Compensation

Introduction

In this brochure, references to “we,” “us,” “our,” or “our firm” refer to Concorde Asset Management, LLC (or “CAM”). Individuals who serve as our directors, officers, employees, and investment adviser representatives are referred to as our “representatives.” Our firm’s clients and prospective clients are referred to as “you,” “your,” or “our clients.”

Headquartered in Livonia, Michigan, we have been in business since September 2006. We are wholly owned by Concorde Holdings, LLC, whose principal owners include John Gakenheimer, Jason Kavanaugh, Mark Kosanke, Gregory Merritt, and Michael Wolf.

Our Services

We sponsor the following four wrap fee programs (collectively, the “Programs”), each of which is designed to help you meet your investment objectives and goals and are more fully described later in this section. For non-discretionary investment management services, we offer the Concorde Advisor Program. For discretionary investment management, we offer the Concorde Professional Management Program, the Concorde Unified Management Program, and the Guided Portfolio Solutions Program. A wrap-fee program bundles various services together and charges an all-inclusive fee, named a “wrap fee” because it wraps around all the services rather than charging a separate fee for each service. If you participate in one of our Programs, we charge you a single specified fee to cover all costs relating to securities transactions in your account, our investment management services, including custody and related services. By giving a client this benefit, both CAM and Concorde Investment Services, LLC (“CIS”), our affiliated broker-dealer, seek to mitigate or remove the conflicts of interest created by the receipt of commissions.

We also offer other customized portfolio management services, including Financial Planning and Third-Party Asset Management Services. This disclosure brochure deals only with our wrap fee Programs. Descriptions of the services and fees for our other services can be found in a separate brochure, which is always available to you on request.

CAM receives a portion of the wrap fee, as does your investment adviser representative. Your investment adviser representative generally receives 25% to 80% of the annualized management fee, excluding any platform fee and that may be an incentive to recommend one of our Programs over other programs or services. However, we monitor trading frequency, and if we do not believe your account activity warrants the wrap-fee, we will request that you move your Program account to a CIS brokerage account. Our Programs provide clients with execution, clearing, and custodial services through CIS’s two clearing firms, Pershing, LLC and RBC Capital Markets, LLC. The choice of the clearing firm used for your Program account is based primarily upon existing account relationships with these firms or on your representative’s preference for the clearing firm’s trading platform and user interface.

Our investment advisory services through our Programs are provided by and through our representatives who, depending on the Program you select, will serve as your individual portfolio manager or point of contact to provide investment advisory and brokerage services to your account. We do not have an investment committee that determines the investment advice or recommendations to be given to our clients. Instead, each of our investment adviser representatives exercises his or her own professional judgment to provide tailored investment advice, recommendations, and advisory services to you on behalf of our firm.

Prior to participating in our Programs, you will execute an investment management agreement with us setting forth the terms and conditions of our management of your investments within the Program. When you become a client, your representative will gather information through in-depth personal interviews with you. This may include one or more in-person meetings and/or telephone calls. We may gather information that includes, but is not limited to, your current financial position, future goals, attitudes toward risk, and your investment objectives. We ask you to fill out a client profile questionnaire or similar document that we will carefully review, along with all other documentation you supply. Because we only rely upon the information you provide us and do not independently verify it, you should provide us with accurate information. Based on the information you provide, we will assist you in selecting an appropriate Program and will develop a personalized portfolio designed to meet your investment goals and objectives through asset allocation, portfolio monitoring, consolidated reporting, and, most importantly, individualized portfolio management. Individualized portfolio management and a tailored investment strategy will help us choose among various kinds of investments available in the market. Investments may include equity securities (stocks), warrants, corporate debt securities (bonds and notes), certificates of deposit, municipal securities, investment company securities (mutual funds, including money market funds), exchange-traded funds, and United States government securities. If appropriate, we may allocate your investments in accordance with model portfolios we make available from many sources. A model portfolio is how we communicate to you what specific investments you should have in your portfolio at any given time.

We emphasize continuous personal client contact and interaction in providing our investment advisory services under our Programs. Based on your individual investment objectives, financial situation, and risk tolerance, we will recommend an initial portfolio allocation. As your financial situation, goals, objectives, or needs change, you must notify us promptly. In addition, if you chose discretionary portfolio management services (see below for more information), you will have the opportunity to place reasonable restrictions on the types of investments held in your portfolio.

Concorde Advisor Program – Non-Discretionary Investment Management Services

In the Concorde Advisor Program, we will manage your assets on a non-discretionary basis, which means that we will first consult with you and obtain your specific approval for buy or sell transactions before we can implement any investment decision on your behalf and any limitations stated in the Investor Profile. Under the Concorde Advisor program, we won't place trades or rebalance your account without your prior approval of each proposed transaction. You should also understand that our having to obtain your prior approval for each transaction will often delay implementation of our recommendations until we reach you, which could result in different market conditions and prices than may be available for accounts managed on a discretionary basis.

Concorde Professional Management Program – Discretionary Investment Management Services

In our Professional Management program, your representative will provide portfolio management for your account on a discretionary basis, which means that we can buy or sell securities on your behalf without your prior permission for each specific transaction. However, the selection of securities or other investments will be in accordance with your investor profile, goals, and risk tolerance as described above in the section entitled, "Investment Management Services." Additionally, you can impose restrictions on the management of your account, including the ability to instruct us not to purchase certain securities. If you chose our professional management of your account on a discretionary basis, we will obtain your prior written authorization in our agreement with you.

Unified Management Account Programs - Concorde UMA Program

We offer the Concorde UMA Program, which is our private labeled program using the platform of FolioDynamix Advisors (“FDx Advisors”). FDx Advisors offers investment models and advisory services through a select group of third-party investment advisers that act as Strategists and Managers for your account. Additionally, FDx Advisors provides related research to your representative regarding the investment discipline and/or approach used by the approved Strategists and Managers on the FDx Advisors’ platform to identify and select those who best fit your specific investment objectives and risk tolerance. In the Concorde UMA Program, we act as the Overlay Manager for your account on a discretionary basis and assume the responsibility for asset allocation, Strategist and Manager selection and termination, portfolio management, as well as communicating trading instructions to your custodian.

FDx Advisors and all related model portfolio managers are investment advisers registered with the U.S. Securities and Exchange Commission and you will be provided with any applicable disclosure documents, as required, prior to engaging their services.

Please refer to Item 9 for additional information on certain back office operations support services that CAM receives from FDx Advisors.

Unified Managed Account Programs - Guided Portfolio Solutions (GPS)

Designed for smaller accounts starting at \$10,000, we offer our private labeled program, Guided Portfolio Solutions (“GPS”) that utilizes a single diversified strategy in each client’s portfolio. Like the Concorde UMA above, the GPS Program uses the platform of FDx Advisors and makes available investment models and advisory services through a select group of third-party investment advisers that act as Strategists and Managers for your account. Additionally, FDx Advisors provides related research to your representative regarding the investment discipline and/or approach used by the approved Strategists and Managers on the FDx Advisors’ platform to identify and select a single diversified strategy that best fits your specific investment objectives and risk tolerance. In the GPS Program, we also act as the Overlay Manager for your account on a discretionary basis and assume the responsibility for asset allocation, Strategist and Manager selection and termination, portfolio management, as well as communicating trading instructions to your custodian.

Please refer to Item 9 for additional information on certain back office operations support services that CAM receives from FDx Advisors.

Concorde Strategic Portfolios

We provide portfolio management services through Institutional Intelligent Portfolios™, an automated, online investment management platform for use by independent investment advisers and sponsored by Schwab Wealth Investment Advisory, Inc. (the “Program” and “SWIA,” respectively). Through the Program, we offer clients a range of investment strategies we have constructed and manage, each consisting of a portfolio of exchange traded funds (“ETFs”) and a cash allocation. The client may instruct us to exclude up to three ETFs from their portfolio. The client’s portfolio is held in a brokerage account opened by the client at SWIA’s affiliate, Charles Schwab & Co., Inc. (“CS&Co”). We are independent of and not owned by, affiliated with, or sponsored or supervised by SWIA, CS&Co or their affiliates (together, “Schwab”). The Program is described in the Schwab Wealth Investment Advisory, Inc. Institutional Intelligent Portfolios™ Disclosure Brochure (the “Program Disclosure Brochure”), which is delivered to clients by SWIA during the online enrollment process.

We, and not Schwab, are the client’s investment advisor and primary point of contact with respect to the Program. We are solely responsible, and Schwab is not responsible, for determining the appropriateness of the Program for the client, choosing a suitable investment strategy and portfolio for the client’s investment

needs and goals, and managing that portfolio on an ongoing basis. SWIA's role is limited to delivering the Program Disclosure Brochure to clients and administering the Program so that it operates as described in the Program Disclosure Brochure.

We have contracted with SWIA to provide us with the technology platform and related trading and account management services for the Program. This platform enables us to make the Program available to clients online and includes a system that automates certain key parts of our investment process (the "System"). The System includes an online questionnaire that helps us determine the client's investment objectives and risk tolerance and select an appropriate investment strategy and portfolio. Clients should note that we will recommend a portfolio via the System in response to the client's answers to the online questionnaire. The client may then indicate an interest in a portfolio that is one level less or more conservative or aggressive than the recommended portfolio, but we then make the final decision and select a portfolio based on all the information we have about the client. The System also includes an automated investment engine through which we manage the client's portfolio on an ongoing basis through automatic rebalancing and tax-loss harvesting (if the client is eligible and elects).

We do not receive a portion of a wrap fee for our services to clients through the Program. Clients do not pay fees to SWIA regarding the Program, but we charge clients a fee for our services as described below under *Item 5*. Our fees are not set or supervised by Schwab. Clients do not pay brokerage commissions or any other fees to CS&Co as part of the Program. Schwab does receive other revenues in connection with the Program, as described in the Program Disclosure Brochure.

We do not pay SWIA fees for its services in the Program so long as we maintain \$100 million in client assets in accounts at CS&Co that are not enrolled in the Program. If we do not meet this condition, then we pay SWIA an annual fee of 0.10% (10 basis points) on the value of our clients' assets in the Program. This fee arrangement gives us an incentive to recommend or require that our clients with accounts not enrolled in the Program be maintained with CS&Co.

Our Fees and Fee Comparison

In this section, we explain how we are compensated for the various advisory services we provide. Our fee includes such services as investment management, execution of securities, the custodian's monthly reports, account servicing, and continuous account management. Participation in our Programs may cost you more or less than purchasing these services separately. The portfolio size and amount, number of transactions made in your account, as well as the commissions charged for each transaction, will determine the relative cost of our Programs versus paying for executions on a per transaction basis and paying a separate fee for advisory services. You may be able to receive services like those offered through our Programs from other investment advisers either separately or as part of a similar wrap fee program. These services or programs may cost more or less than our Programs, depending on the fees charged by the other service providers. Because we absorb all the transaction costs in our Programs, we have a financial incentive to infrequently trade our Program client accounts because infrequent trades will increase our net fee. To mitigate this conflict of interest in our Programs, we monitor the trading frequency. If you don't participate in our Programs, you may direct your brokerage to another unaffiliated broker-dealer. Although investment advisers may allow clients to direct their transactions to their own preferred broker-dealer, this is generally not done with wrap fee programs.

We want you to be aware of how we and our representatives are paid as well as any fees and compensation that we may receive about the advisory services we provide. This information can be found in some or all the various documents:

- This ADV Wrap Fee brochure
- Your Investment Advisory Services Agreement
- Custodial or brokerage account agreements
- FDX Advisors Disclosure Brochure or similar document
- Mutual fund prospectuses and Statements of Additional Information

Your representative may also receive commissions or other compensation as registered representatives of our affiliated broker-dealer and/ or as insurance agents. This additional compensation is separate and distinct from our advisory compensation under our Programs. We discuss this in more detail later in this section.

Our Program advisory fees for discretionary and non-discretionary investment management services are negotiable. We will consider the nature and complexity of the services we are providing you, our relationship with you, the value of assets being managed, the value of other assets held in other accounts we manage or advise for you, the potential for additional business or clients, the amount of work anticipated, and the attention needed to manage your assets. The actual billing rate will be specified in the Investment Advisory Services Agreement we sign with you. For fee calculation purposes, we rely upon the market value of investments in your account as determined by your custodian's valuation, including any balances held in money market funds. Our advisory fees cover our investment advisory services, but do not cover certain other charges as described below.

Our advisory fees will be paid quarterly, in advance or in arrears, as set forth in our agreement with you. The quarterly structure may be based on a calendar quarter or the month the account was opened. For accounts opened or closed during a quarter, we will prorate the fee for the number of days our services were provided.

Other Fee Proration and Adjustments

We reserve the right to prorate our fees for large deposits to your account made during a billing cycle. No adjustments or refunds will be made for pre-paid fees based upon partial withdrawals from your account.

Direct Billing to Your Custodian

Unless otherwise agreed, you will authorize us to deduct our periodic advisory fees from your designated account. Your authorization is limited to our withdrawing our advisory fees as and when due. We will provide your custodian with your written fee deduction authorization. Your account custodian will, on a quarterly basis, provide you with an account statement indicating the advisory fees paid to us from your account. You may terminate your authorization at any time, in writing, but you will remain responsible for promptly paying us any advisory fees that remain due and unpaid.

If our direct fee deduction has been authorized, then our fees will be deducted from the cash balance in your account. If insufficient cash is available, then we will typically liquidate enough securities in your account to cover the balance due the following order: money market shares, mutual fund shares, and then other types of securities. For taxable accounts, a liquidation of securities may result in taxable income to you.

Other Account-Related Expenses

In addition to our advisory fees, you may also incur certain charges imposed by custodians, for transfer taxes, wire transfer and electronic fund fees, transfer of account fees, other fees and taxes on brokerage accounts and securities transactions. All such fees and expenses are disclosed to you in account opening documents and disclosure brochures of third-party managers.

Fee Schedule Changes and Termination of Services

If we amend our fee schedule, we will send you notice in writing at least 30 days prior to the effective date. You may terminate our services if you do not accept the new fee schedule. Otherwise, the new fee schedule will be effective as of the next billing cycle.

You or we may terminate our services for any reason by providing seven business days' advance written notice from either party to the other. If you terminate an agreement with us, pre-paid and un-earned advisory fees will be promptly refunded, generally within 30 days. Fees paid in arrears will be charged through the date of termination. Regardless of when you terminate our services, you will remain responsible for all brokerage and custodial fees incurred for the benefit of your account.

Fee Changes for Changes in Services

Your representative may affect a change in your fees in the event of a change in the level of services provided to you. Because a maximum fee may be set, a conflict of interest exists where the representative can increase fees to their maximum rate. However, we seek to mitigate that conflict of interest by requiring a new advisory agreement to be signed by you and then reviewed and approved by our supervisory personnel prior to the fee change.

Investment Management Services Fee – Concorde Advisor and Professional Management Programs
Generally, our fees for our non-discretionary Concorde Advisor Program and our discretionary Professional Management Program are based on a percentage of assets under management. Advisory fees do not include platform fees and custodial expenses such as commissions, ticket charges, or asset-based custody charges. Fees are negotiable and fall generally within the tiered ranges as follows:

<u>Assets Under Management</u>	<u>Annualized Fee Range</u>
On the First \$500,000	0.5% - 2.00%
On the Next \$500,000	0.5% - 1.50%
On the Balance Above \$1,000,000	0.25 – 1.25%
Subject to a minimum fee of \$300 per quarter.	

Your specific advisory fees will be set forth in your Advisory Services Agreement. In negotiating fees with you, your representative takes several factors into consideration such as services you request and the strategy selected. For example, an account having a portion of assets in a fixed income strategy, a portion in a growth strategy, and a portion in an aggressive strategy will have three different rates applied to each strategy resulting in a blended rate for billing purposes. Total fees to your representative typically range from 1% to 2% and may change should your representative exercise discretion to change managers within your selected platform offering, subject to the maximum fee established in your agreement with us. A conflict of interest exists when your representative can charge the highest fee in the range. We seek to mitigate that conflict by performing due diligence on suggested portfolio allocations to help ensure that you are receiving services corresponding to the fees charged and requiring customer consent to change programs. We also review and approve each management recommendation prior to changes in fees.

Platform Fees

Platform fee charges in addition to the fee schedule above. They will not be billed separately, but will be included on the fees deducted for your account. If requested, they cover performance reporting, billing, and other account maintenance services such as rebalancing.

<u>Market Value of Assets in Account</u>	<u>Annualized Platform Fees</u>
On the first \$1,000,000	0.15%
On the next \$1,000,000	0.13%
On the next \$3,000,000	0.12%
On the next \$5,000,000	0.10%
Over \$10,000,000	0.10%

Concorde Unified Managed Account Fees

Fees for services through the Concorde UMA Programs are negotiable by each of our representatives based upon your needs and the complexity of your situation, including the composition of your account (e.g. equities vs. mutual funds), the potential for additional account deposits, and the other factors previously described above.

Based on the above negotiability factors, your representative can set the fee for services provided through the Concorde UMA Programs up to a maximum of 2.0% annually. The Concorde UMA Program fee structure, though wrapped as a single fee, has four components: the representative's fee, the subadvisor or model manager(s) fee, the Overlay Platform Fee, and the custodian fee. This means that a portion is paid to your representative who oversees your account (the range is 0.25% to 1.00% annually), a portion is paid to the subadvisor or model manager(s) selected (the range is 0.15% to 1.0% annually), and a portion is paid to us for the Overlay Platform fee (the range is 0.16% to 0.25%). The model manager fees will vary depending on the type of strategy you employ. If you are utilizing more than one model manager in your account, your subadvisor fees will be assessed on the value of assets in each strategy. The annual fee will be specified in your Concorde UMA Program client agreement with us. Additionally, there is a \$100.00 minimum annual platform fee per account. The minimum account size is \$25,000 and we will adjust our management fees on a pro rata basis for deposits over \$20,000 that occurs anytime in your account other than on the last business day of each calendar quarter.

Concorde Guided Portfolio Solutions UMA Program

Fees for services through the Guided Portfolio Solutions Program are negotiable by each of our representatives based upon your needs and the complexity of your situation, including the composition of your account (e.g. equities vs. mutual funds), the potential for additional account deposits, and the other factors previously described in the section entitled, "Our Investment Management Fees."

Based on the above negotiability factors, your representative can set the fee for services provided through the Guided Portfolio Solutions Program up to a maximum of 2.0% annually. The Guided Portfolio Solutions Program fee structure has four components: the representative's fee, the subadvisor or model manager fee, the Overlay Platform Fee, and the custodian fee. This means that a portion is paid to your representative who oversees your account (the range is 0.25% to 1.00% annually), a portion is paid to the subadvisor or model manager selected (the range is 0.15% to 1.0% annually), and a portion is paid to us for the Overlay Platform fee (the range is 0.16% to 0.25%). The model manager fee will vary depending on the type of strategy you employ. The Guided Portfolio Solutions Program consists of a single sub-adviser strategy specially designated by us. Only one strategy per account is eligible in our Guided Portfolio Solutions Program. The annual fee will be specified in your Guided Portfolio Solutions Program client agreement with us. Additionally, there is a \$100 minimum annual platform fee per account. The minimum account size is \$10,000 and we will adjust our management fees on a pro rata basis for deposits over \$20,000 that occurs anytime in your account other than on the last business day of each calendar quarter.

Overlay Platform Fee Schedule Concorde UMA and Guided Portfolio Solutions

<u>Account Value</u>	<u>Annualized Fee</u>
First \$500,000	0.25%
Next \$1,500,000	0.23%
Next \$3,000,000	0.20%
Assets Above \$5,000,000	0.16%

Concorde Strategic Portfolios

As described in *Item 4 Advisory Business*, clients do not pay fees to SWIA or brokerage commissions or other fees to CS&Co as part of the Program. Schwab does receive other revenues in connection with the Program, as described in the Program Disclosure Brochure. Brokerage arrangements are further described below in *Item 12 Brokerage Practices*.

Client fees payable to Concorde are based upon the following fee schedule:

<u>Account Value</u>	<u>Annualized Fee</u>
First \$500,000	0.60%
Next \$1,500,000	0.50%
Next \$3,000,000	0.35%
Assets Above \$5,000,000	0.25%

The above fee schedule is billed quarterly in advance based upon the account value as of the last trading day of each calendar quarter end.

Item 5: Account Requirements and Types of Clients

Account Requirements

Minimum account size varies by the investment management program you select. Those minimums are described in the Programs above.

Types of Clients

Concorde Investment Management

Our clients include individuals, businesses, trusts and estates, retirement plan sponsors and plan participants, foundations, endowments, and other charitable organizations.

Concorde Strategic Portfolios

Clients eligible to enroll in the Program include individuals, IRAs and revocable living trusts. Clients that are organizations (such as corporations and partnerships) or government entities, and clients that are subject to the Employee Retirement Income Security Act of 1974, are not eligible for the Program. The minimum investment required to open an account in the Program is \$5,000. The Program Disclosure Brochure describes related minimum required account balances for maintenance of the account, automatic rebalancing, and tax-loss harvesting.

Item 6: Portfolio Manager Selection and Evaluation

Advisory Business

We are the sponsor of the Programs, and our investment advisory representatives act as the portfolio managers for each of the Programs. Please see Item 4 above for information about our Programs. As a firm, we maintain approval standards for investment advisory representatives who wish to participate in our Programs as portfolio managers. Each investment advisory representative candidate provides our firm with background information that includes, but is not limited to, the following items:

- Investment philosophy and management style.
- Years of industry experience.
- Educational background, including graduate and undergraduate degrees.
- Professional designations.
- Disciplinary history for 10 years.
- Credit history for 10 years.

We verify and evaluate the above-referenced information as part of our due diligence for accepting an investment advisory representative as a portfolio manager in the Programs.

In many instances, the investment advisory representative already has a successful advisory relationship with you as a client and utilizes our Programs as additional tools for managing client assets.

Participation in Wrap Fee Programs

Our wrap fee and non-wrap fee accounts are managed on an individualized basis according to a client's investment objectives, financial goals, risk tolerance, etc. We do not manage wrap fee accounts in a different fashion than non-wrap fee accounts.

Performance-Based Fees and Side-By-Side Management

We do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of your assets).

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Our analysis begins with a review of your goals, time horizon, and risk tolerance through an interview process to determine a plan/portfolio that will best suit your needs. Consultations and a written questionnaire or similar document are often used to gather information. This information is used to determine what investment recommendations are appropriate. We rely on the information provided by you and do not verify the accuracy of information or reports you provide.

Our investment advisory services are provided by and through our representatives. We do not have a centralized investment committee that determines the investment advice or recommendations to be given to our clients. Instead, each of our investment adviser representatives exercises his or her professional judgment to provide our investment advice, recommendations, and advisory services on behalf of our firm.

Our representatives rely upon several methods of investment analysis in formulating investment advice. For example, when analyzing individual stocks, bonds, or other investments, our representatives may rely upon fundamental analysis, which is a technique that attempts to determine a security's value by focusing on the economic well-being of a company, as opposed to movements of its market price. When conducting fundamental analysis, various factors are evaluated including, but

not limited to a review of a company's financial statements, determining whether the company's revenue is growing, if the company is profitable, if the company and its management is in a strong enough position to beat its competitors in the future, and if the company can repay its debts. Because it can take a long time for a company's value to be reflected in the market, the risk associated with this method of analysis is that a gain is not realized until the securities market price rises to its true value.

Our representatives may also utilize technical analysis to evaluate potential investments. Unlike fundamental analysis, technical analysis does not analyze the company's value, but instead analyzes the movement of stock prices in the market, both individually and within an industry or sector of the economy. Technical analysis studies the supply and demand in the market to determine historical and future trends. Stock price movements, compared to indices and benchmarks, may be analyzed using historical charts and market-related empirical data. Notwithstanding favorable market price movements, a company's financial condition and other unique factors can adversely affect its value.

Representatives may also employ cyclical analysis which consists in considering whether a company's stock or the industry in which it operates is cyclical or not. Cyclical stocks or industries are affected by broad changes in our economy's business cycle. The value of cyclical stocks tends to move in the same direction as the economy, while the value of counter-cyclical stocks tends to move in the opposite direction.

As with any method of analysis, past performance does not assure future performance.

When analyzing and recommending mutual funds, our representatives generally apply fundamental analysis and review a broad range of information about each fund, including investment style, strategies, diversification, portfolio size, turnover, performance, and management team. We will also review investment and redemption terms, sales loads, as well as internal management fees and expenses. Most of this information comes from each mutual fund's prospectus. Depending on your age, risk tolerance, and time horizon, we take into consideration an appropriate allocation of investments among various types of mutual funds.

In addition to prospectuses, our representatives obtain information from several sources, both public and by purchase, including financial newspapers and magazines, inspection of corporate activities, research materials prepared by third-parties, corporate rating services, annual reports, reports filed with the SEC, and company press releases. While we do not guarantee the accuracy of these materials, these information resources are generally believed to be reliable and we reasonably rely upon them for making investment decisions.

Investment Strategies

We may recommend one or more of the following investment strategies: long-term purchases (held at least a year), short term purchases (held less than a year), trading (sold within 30 days), margin transactions and option writing (selling an option).

Your representative may recommend implementing these strategies using stocks, bonds, mutual funds (held directly or held within sub accounts of variable annuities), municipal securities, option contracts, certificates of deposits and other types of investments. We often recommend mutual funds of different kinds to promote portfolio diversification within various asset classes, such as industry sectors, domestic, international, or equities/bonds. Your representative may recommend periodic purchases, sales, and exchanges of those mutual fund shares within mutual fund families and between different mutual fund families when there are changes in client needs, market conditions, or economic developments.

When we recommend one or more investment strategies, we seek to combine various risk categories that, when considered as a whole, have a blended risk/return characteristic that seeks to be consistent with your overall risk tolerance and investment return objectives (including anticipated time horizons for achieving those returns). From time to time, change in your investments will likely occur based on a variety of factors, including such things as your representative's assessment of the stock market, interest rates, the economy, recent developments affecting specific securities, and other considerations. We make changes to the composition of your portfolio or its investment weighting by purchasing or selling securities held in the account.

Your investment representative's investment decisions will be driven primarily by changes in his or her asset allocation recommendations for your account, rather than the timing of purchases or sales of any particular investment or how long you may have held an investment. Barring restrictions or instructions that you may impose to the contrary, your representative will purchase, sell, and hold investments in your portfolio without specific consideration of other investments outside of our management and without regard to the specific tax consequences resulting from the purchase or sale of an investment.

Our customized approach helps your representatives to manage your account while allowing flexibility. For example, you may own some investments that you wish to hold for personal or other reasons or, for tax reasons, you may not desire to sell previously owned securities that we or our representatives would not have recommended. In such cases, you should be aware that we cannot be responsible for the suitability of investments that you made before or apart from our recommendation, regardless of whether you continue to hold them after we begin managing your account.

Types of Investments and Risk of Loss

We provide investment advice with respect to a wide range of investments, including mutual funds, indexed funds, exchange traded funds (generically referred to as "funds"), unit investment trusts, stocks, bonds, variable life insurance and annuities. We may also recommend alternative investment securities such as interval funds and hedge funds, as well as interests in real estate investment trusts (REITs).

We also offer advice about separately managed accounts by unaffiliated investment advisors, mutual funds, exchange-traded funds, and variable annuities. Our representatives will answer any questions you may have about these kinds of investments and investment programs.

Mutual Funds

Our representatives often recommend mutual funds of different kinds to promote portfolio diversification within various asset classes, such as industry sectors, domestic versus international, or equities versus bonds. They may recommend periodic purchases, sales, and exchanges of those mutual fund shares within mutual fund families and between different mutual fund families when there are changes in your specific needs, general market conditions, or economic developments.

The different kinds of mutual funds used each have inherently different risk characteristics and should not necessarily be compared side by side. A bond fund with below-average risk, for example, should not be compared to a stock fund with below average risk. Even though both funds have low risk for their respective categories, stock funds overall have a higher risk/return potential than bond funds.

Of all the asset classes, cash investments (i.e. money markets) offer the greatest price stability, but have yielded the lowest long-term returns. Bonds generally experience more short-term price swings and, in turn, have generated higher long-term returns than cash equivalents. However, stocks historically have been

subject to the greatest short-term price fluctuations—and have provided the highest long-term returns, though past performance is no guarantee of future performance.

The risk in any given mutual fund depends on the investments it holds. For example, a bond fund has interest rate risk and income risk. Bond prices are inversely related to interest rates. If interest rates go up, bond prices will go down and vice versa. Bond income is also affected by a change in interest rates. Bond income (yields) is directly related to interest rate changes. If interest rates rise, bond yields rise and vice versa. Income risk is greater for a short-term bond fund than for a long-term bond fund. However, in a long-term bond fund, your principal is subject to higher principal risk.

Similarly, a sector stock fund (which invests in a single industry, such as biotechnology) is at risk that its price will decline due to developments in its industry. A stock fund that invests across many industries is more sheltered from this industry related risk. However, while diversification across industries can help reduce your risk of loss from investing in a single sector, it may limit your opportunity for a significant gain if a single industry or sector increases dramatically in value.

Exchange-Traded Funds

Exchange-traded funds (“ETFs”) represent a fractional ownership interest in an underlying portfolio of securities or commodities. Many exchange-traded funds track a specific market index and some are actively managed. Some invest in specific economic sectors, domestically or globally.

Most ETFs combine characteristics of an open-end mutual fund and a stock. However, unlike open-end mutual funds, ETFs are not bought and sold by the fund’s sponsor at the daily net asset value, which means that individual investors do not purchase or redeem shares from the fund itself. Instead, like stocks, individuals buy and sell shares of ETFs on an exchange, including the American Stock Exchange, the New York Stock Exchange, and the Chicago Board Options Exchange. The trading dynamic is also a mixture of the two types of securities. That is, prices of ETFs fluctuate according to changes in their underlying portfolios and according to changes in market supply and demand for ETF shares themselves. ETFs offer investors a cost-effective opportunity to obtain portfolio diversification by buying or selling an interest in a portfolio of stock or bonds in a single transaction.

Expenses and other factors may affect the performance of an ETF so that the ETF’s performance will not exactly match the performance of its respective underlying index. This risk is sometimes referred to as a “tracking error.”

Alternative Investments

Interval Funds. These alternative investments are closed-end mutual funds with a hybrid structure in which they engage in a continuous public offering of their securities, price their shares daily, and pay broker-dealers initial and continuing compensation. CIS and your representative may receive separate and customary compensation for selling these products. If your representative has received separate sales compensation for selling these products, he or she will not collect management fees on these products for two years following the sale. Additionally, shares of interval funds are not listed on a securities market and consequently, they redeem shares by making periodic self-tenders on a routine basis, such as quarterly, monthly, semi-annually, or annually. Most interval funds invest in highly illiquid and speculative securities and are considered high risk. You should read the prospectus for the fund which contains a full description of risks, fees, and investment objectives before deciding to invest. You should only invest in an interval fund if you can sustain a complete loss of your investment.

Hedge Funds. Hedge funds are alternative investments using pooled funds that may use numerous kinds of investment strategies, including, but not limited, to, private equity, venture capital, derivatives, futures and other forms of leverage. The goal of using a hedge fund is to generate high returns. Like interval funds, hedge funds are highly speculative and illiquid. As a high-risk investment, you should only invest in a hedge fund if you can sustain a complete loss of your investment. Unlike interval funds, hedge funds are not public offerings and investors must meet certain income and net worth requirements under Regulation D. Most hedge funds involve substantial fees and commissions. You should read the private placement memorandum or offering document for a full description of risks, fees, and investment objectives before deciding to invest. CIS and our representative may receive separate and customary compensation for selling you a hedge fund. If your representative has received separate sales compensation for selling these products, he or she will not collect management fees on these products for two years following the sale. Our representatives can answer any questions you may have and will assist you in determining whether these investments are suitable and in your best interests to invest.

Concorde Strategic Portfolios

The Program Disclosure Brochure includes a discussion of various risks associated with the Program, including the risks of investing in ETFs, as well as risks related to the underlying securities in which ETFs invest. In addition, the Program Disclosure Brochure also discusses market/systemic risks, asset allocation/strategy/diversification risks, investment strategy risks, trading/liquidity risks, and large investment risks.

Investment Risks and Rewards

Securities, mutual funds, fixed and variable annuities, and alternative investments all bear different types and levels of risk. These risks will be discussed with you in determining the investment objectives that will guide our investment advice for your account. Upon request, as part of our services, your representative can discuss the types of investments and investment strategies that have the potential to reduce these risks considering your specific circumstances and financial objectives.

Obtaining higher rates of return on investments typically entails accepting higher levels of risk. Based upon our discussion with you, your representative will attempt to identify the balance of risks and rewards that is appropriate and comfortable for you. However, it is still your responsibility to ask questions if do not understand fully the risks associated with any investment or investment strategy.

We and our representatives strive to render our best judgment on behalf of our clients. Still, there can be no assurance that your investments will be profitable or that no losses will occur in your investment portfolio. Past performance is one relatively important consideration with respect to any investment or investment advisor, but it is not a predictor or guarantor of future performance. While our representatives will continuously strive to provide outstanding long-term investment performance for clients, many economic and market variables beyond our control can affect the performance of your investments.

There are many types of risks, which vary with the type of investment or strategy. Our representatives would be happy to discuss them. The following are some of the more common investment-related risks that may affect your investment portfolio:

- Business risks are associated with a particular company or industry. For example, start-up companies carry greater business risks than established companies. Companies developing new technologies carry greater business risks than manufacturers of well-established or widely used products and services.

- Financial risks are often associated with the ability of a company to raise capital or finance its operations, as well as its ability to repay indebtedness. Highly leveraged companies face greater financial risks than well-capitalized companies.
- Market risks are related to the effects of economic, political, natural disasters, or other events on the price of a publicly-traded stock, bond, exchange-traded fund, or other securities. This type of risk is typically affected by extrinsic factors that often are not related to a particular company's financial condition, performance, or circumstances. For example, investment speculation can materially affect market prices.
- Liquidity risks are associated with an investor's ability to readily convert a security or other asset into cash. Generally, there is greater liquidity for securities that are publicly traded on stock exchanges or trading facilities that match buy and sell orders. Privately offered securities may be highly illiquid because there is little or no trading or market activity.
- Concentration risks result from a lack of investment diversification, which may be expressed in terms of geography, industry, or economic sector. For example, mutual funds typically invest in many different companies, typically lowering the risk that one or a small number of those companies experience a significant loss.
- Options are complex, derivative securities that involve special risks. Option contracts expire at a stated maturity date and have no further value. Unlike traditional securities, the value of an option and the return from holding an option varies with the value of the underlying security from which it derives and other factors.
- Interest-rate risks are associated with changes to investment prices due to increasing or decreasing interest rates. For example, when interest rates rise, yields on newly issued bonds become higher, making them more attractive than yields on already outstanding bonds, which may cause the market values of outstanding bonds to decline.
- Real estate investment trusts ("REITs") own, directly or indirectly, various types of real property interests and, therefore, bear real estate-related risks, among others. Most REITs focus on particular types of commercial development, such as apartments or office buildings, exposing them to downturns in demand, occupancy, and prices for these kinds of real estate. Some REITs bear risks associated with excessive debt, geographic concentration, and poor property management practices.
- Inflationary and deflationary risks are associated with the purchasing power of the dollar, which is affected by broad economic, monetary, governmental policies, and the balance of supply and demand for products and services.
- Reinvestment risks are typically related to fluctuations in the potential interest rate at which future investment proceeds may have to be invested. For example, reinvestment risks may increase during periods of falling interest rates. This risk primarily relates to bonds and other fixed income securities.
- Currency risks are primarily associated with foreign securities. For example, a company's earnings in a foreign country may be affected by fluctuations in the value of the dollar against that foreign currency. Similarly, the investment return of a foreign security may be affected by changes in currency exchange rates, accounting methods, as well as political and economic instability.

Voting Client Securities

Concorde Strategic Portfolios

As described in the Program Disclosure Brochure, clients enrolled in the Program designate SWIA to vote proxies for the ETFs held in their accounts. We have directed SWIA to process proxy votes and corporate actions through and in accordance with the policies and recommendations of a third-party proxy voting service provider retained by SWIA for this purpose. Additional information about this arrangement is available in the Program Disclosure Brochure. Clients who do not wish to designate SWIA to vote proxies may retain the ability to vote proxies themselves by signing a special CS&Co form available from us.

Other Investment Management Programs

We will not vote the proxies for securities held in your accounts. Proxy materials will be forwarded to you for voting. If you have questions about a proxy solicitation, we would be happy to discuss it with you.

Item 7: Client Information Provided to Portfolio Managers

We are the sponsor of our Programs and our advisory representatives are the portfolio managers. You should notify your advisory representative promptly if your financial situation or investment objectives change. You may also contact us at the main office at (248) 824-6710.

Item 8: Client Contact with Portfolio Managers

You may contact us at (248) 824-6710. Our normal business hours are 8:30 a.m. to 5:00 p.m. Monday through Friday. You are always free to directly contact your advisory representative with any questions or concerns that you may have about your portfolio.

Item 9: Additional Information

Disciplinary Information

As a registered investment adviser, we are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of our firm or the integrity of our management. We have no legal or disciplinary events to disclose.

Other Financial Industry Activities and Affiliations

As a registered investment adviser, we must disclose information regarding our business activities, other than giving investment advice, our other activities in the financial industry, and any arrangements with related persons that are material to our advisory business or clients. We are also required to disclose if we receive cash or other economic benefits from a third-party regarding advising our clients.

Our Affiliated Broker-Dealer

Through our parent firm, Concorde Holdings, Inc., we are under common control and ownership, and therefore affiliated with, Concorde Investment Services, LLC ("CIS"), a FINRA member registered broker-dealer. Generally, our investment adviser representatives are registered representatives of CIS, and as such they can engage in most kinds of securities transactions on your behalf.

Relationships or Arrangements Material to our Advisory Business

When persons associated with us effect securities transactions as registered representatives of CIS, CIS may receive separate and customary compensation for this activity. In some circumstances, CIS may receive customary compensation from mutual fund companies, variable annuity companies or other similar products, including 12b-1 fees, for performing certain administrative and/or shareholder servicing related tasks associated with your investments in such securities. We recommend CIS to our clients for noncustodial brokerage services. This creates a potential conflict of interest. However, if you invest in our Wrap Fee Program, we mitigate this conflict by offering our services on a wrap fee basis as you pay the one fee regardless of the number of transactions. We also seek to mitigate this conflict of interest by reviewing all transactions in commission-based products and services to help ensure each is made in the best interest of our clients.

Our Affiliated Insurance Agency

Through our parent firm, Concorde Holdings, Inc., we are also under common control with Concorde Insurance Agency, a licensed insurance agency. Most of our representatives are also licensed insurance agents of various insurance companies and receive insurance commissions on insurance products that they may recommend. This additional compensation creates a conflict of interest, which you should consider before engaging our services or the services of our affiliated businesses. Our advisory fee offset policy, described in Item 5, Fees and Compensation above, is intended to mitigate those conflicts. You may always choose a different insurance agent to implement our advice.

Our Affiliated Accounting and Tax Service

Through our parent firm, Concorde Holdings, Inc., we are also under common control with Concorde Accounting and Tax Services, which provides professional accounting and tax services to businesses and individuals. These services are provided under a separate agreement and are separate and distinct from our services. You are welcome, but never obligated to utilize the accounting and tax services offered by Concorde Accounting and Tax Services.

Our Recommendation of Other Investment Advisers

If appropriate in your circumstances, we may recommend the use of other investment advisers outside of our Programs such as Sawtooth Solutions, LLC and FDx Advisors, who are part of the third-party investment advisory and sub-advisory services described in the “Advisory Business” section of our Form ADV Part 2A Firm Brochure, available upon request. We generally receive a share of the ongoing management fees in these programs as described in the “Fees and Compensation” section above. The fees for these programs are shared among us, the other program sponsors, and the specified third-party investment manager. This may create potential conflict of interest when our representatives choose among the third-party investment advisory services and our own investment management services because we may retain more of the fees in our own advisory programs. We seek to mitigate this conflict by carefully reviewing your participation in one or more of the programs available and, in our judgment, recommending the program(s) that better match your needs, goals and objectives. Since these programs allow us to determine the standard advisory fees to our clients, we consider the total advisory fees you would incur and set our fees at competitive levels. Similar advisory services may, however, be available from other investment advisers at a lower cost.

Our Other Financial Industry Activities

Back Office Operations Agreements. In addition to being sub-advisers to some of our clients’ accounts, we have entered into operations services agreements with Sawtooth Solutions, LLC and FDx

Advisors to provide account performance evaluation reports, fee calculation, and other back office operational support services for some of our managed accounts. Thus, when one of our representatives makes a recommendation to use one of these sub-advisers, a conflict of interest exists because these sub-advisers also provide operations support services to us. To address this conflict, our supervisory personnel review the sub-advisory recommendation against the client's suitability information.

Trust Services Joint Marketing and Advisory Agreements. We have also entered a joint marketing arrangement with FiPar, LLC ("FiPar"), a trust marketing company that is mostly owned and controlled by John Gakenheimer, one of our owners and Vice President of Business Development. The purpose of the arrangement is to market third-party trust services to our clients and prospective clients and to provide investment portfolio management services to independent, unaffiliated trust companies for their trust accounts. Currently, FiPar has entered a marketing referral arrangement with BOKF, NA, a nationally chartered bank and trust company. In consideration for this arrangement, FiPar receives a share in the ongoing trust administration service fees for trust business it refers to BOKF. BOKF may, in its sole discretion, accept or reject any referral trust business referred by FiPar. In addition, we have entered an agreement with BOKF to provide investment management services as BOKF's agent for certain trust accounts. Under this arrangement, BOKF pays us an investment management fee on the market value of the assets held in trust accounts we advise.

Our joint marketing through FiPar of BOKF's trust services and the compensation we receive from BOKF for our investment management services creates a conflict of interest for us and Mr. Gakenheimer when clients choose to use the trust services of BOKF because we receive customary investment management fees and Mr. Gakenheimer, through FiPar, receives a share of the trust administrative fees.

To help mitigate these conflicts, we advise our clients that they are not required to use BOKF's trust services marketed by FiPar. We supervise dual employees of CAM and FiPar (currently, Mr. Gakenheimer is the only dual employee) to reasonably ensure compliance with client investment guidelines and applicable regulatory requirements. Additionally, the investment management fee that BOKF pays us is solely determined by BOKF and is disclosed to the trust account owner and/or beneficiary by BOKF. The trust referral fees paid by BOKF to FiPar do not result in any increase of fees above the published fee schedule associated with the trust account. The investment management fees paid by BOKF's trust clients to CAM are not higher than CAM's published fee schedule disclosed elsewhere in this brochure.

Outside Business Activities of Our Representatives

Some of our representatives' own companies that perform legal, insurance, real estate, investment advisory, and accounting services. These are not affiliated with, controlled by, or under common control with us. Their respective services are provided under a separate agreement and are unrelated, separate, and distinct from the services we provide. You are under no obligation to utilize these services relating to any of the services that we provide.

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

We have adopted a Code of Ethics (the "Code") describing the standards of business conduct we expect all our officers, directors, employees, and representatives to follow. The Code also describes certain personal

securities transaction reporting requirements with which individuals associated with or employed by us must comply.

Our principals and representatives will often own the same securities recommended to our clients. Generally, these securities will be shares of open ended mutual funds or stocks and bonds actively traded on a national securities exchange or market where the time and size of their purchases or sales will not affect transactions for our clients. If we do recommend the purchase or sale of a thinly traded security to a client, we will ensure that representatives' personal transactions do not adversely affect clients nor improperly benefit our principals and representatives, typically by completing their transactions after all client transactions have been made. Neither our firm nor our representatives are permitted to benefit, directly or indirectly, from transactions made in your account.

Orders for clients may sometimes be aggregated or "batched" into one large order and will be fairly allocated among all participating accounts. The firm will aggregate where there is a benefit to the client.

We review the Code annually and update it as necessary. You may request a copy free of charge by contacting us at 248-824-6710.

Review of Accounts

You will receive reports at least quarterly from your account custodian. You may also receive written performance reports from your representative as often as agreed upon between you and your representative, but usually not more frequently than quarterly. Your portfolio is regularly reviewed by your representative as agreed upon by you and your representative. You or your representative may request more frequent reviews if warranted by events triggered by material changes in your circumstances or material events in the market, political, or economic circumstances.

We conduct reviews to help ensure that the investments in your account are still consistent with your stated investment objectives and risk tolerance guidelines. We encourage you to compare the information on any account statement you receive from us with your custodial statements to determine whether there is any inconsistent information. Please note that our written performance reports may vary from official custodial statements based on differences in accounting procedures, reporting dates, or valuation methodologies of certain securities. Please call our main office or your custodian if there are any apparent inconsistencies or if you have any questions.

Client Referrals and Compensation

From time to time, we engage solicitors to market our services. When we do so, you will receive a separate solicitor's disclosure brochure describing our solicitation arrangements, the compensation we pay to the solicitor, and the terms of that relationship. You will also receive a copy of this Form ADV, Part 2A, as our disclosure brochure. If a solicitor refers you to us, your total advisory fees will be based, in part, on the amount of the solicitation fee we pay to the solicitor. You may be paying more than our other clients for the same advisory services depending upon the amount of the advisory fees paid to the solicitor.

Financial Information

We have no financial condition that impairs our ability to meet our contractual and fiduciary commitments to our clients, and we have not been the subject of a bankruptcy proceeding.

