

Item 1: Cover Page

Crumly and Associates, Incorporated
dba Troxell Financial
Form ADV Part 2A
Investment Adviser Brochure

October 2018

This brochure provides information about the qualifications and business practices of Troxell Financial. If you have any questions about the contents of this brochure, please contact Kevin Crumly, President and Chief Compliance Officer. 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. Registration does not imply a certain level of skill or training.

Additional information about Troxell Financial is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number. Troxell Financial's CRD Number is 168998.

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Item 2: Summary of Material Changes

Annual Update

In this Item of Crumly and Associates, Incorporated dba Troxell Financial (Troxell or the Firm) Form ADV 2, the Firm is required to discuss any material changes that have been made to Form ADV since the Firm's last Annual Amendment filing, dated February 16, 2017.

Material Changes since the Last Update

Since the Firm's last Annual Amendment filing, the Firm has the following material changes to report:

- We amended our fee schedule, please refer to Item 5: Fees and Compensation

Full Brochure Available

Troxell's Form ADV may be requested at any time, without charge by contacting Kevin Crumly, President and Chief Compliance Officer at 217.321.3210 or kevin.crumly@troxellfinancial.com.

Item 3: Table of Contents

Item 1: Cover Page	1
Item 2: Summary of Material Changes	2
Item 3: Table of Contents	3
Item 4: Advisory Business	4
Item 5: Fees and Compensation	6
Item 6: Performance-Based Fees and Side-by-Side Management	9
Item 7: Types of Clients	9
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss	9
Item 9: Disciplinary Information	11
Item 10: Other Financial Industry Activities and Affiliations	11
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	11
Item 12: Brokerage Practices	12
Item 13: Review of Accounts	14
Item 14: Client Referrals and Other Compensation	15
Item 15: Custody	15
Item 16: Investment Discretion	15
Item 17: Voting Client Securities	15
Item 18: Financial Information	16
Form ADV Part 2B – Investment Adviser Brochure Supplement	17

Item 4: Advisory Business

Crumly and Associates, Incorporated dba Troxell Financial (Troxell) was founded in 2011 and is primarily owned by Kevin Crumly, President and Chief Compliance Officer.

Troxell provides portfolio management services to individuals, high net worth individuals, pension and profit sharing plans, and corporations or other business entities. Troxell also provides financial planning services to individuals.

Portfolio Management Services

Troxell provides continuous investment advice and portfolio management services based on the individual needs of its clients. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, Troxell develops and manages a portfolio based on the client's needs. Troxell will ensure that each client's investments are suitable for that client and consistent with their investment needs, goals, objectives and risk tolerance. Account supervision is guided by the stated objectives of the client (i.e., capital preservation, income with moderate growth, growth and income, growth, and aggressive growth, etc.). It is Troxell's practice to tailor its advisory services to the individual needs of clients.

Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the client's behalf. Clients will retain individual ownership of all securities.

Troxell will make investment decisions for clients and allocate its client's investment management assets, on a discretionary or a non-discretionary basis among mutual funds, exchange traded funds, individual debt and equity securities, real estate investment trusts (REITs) and other investments in accordance with the investment objectives of the client. Some or all of these investments may have limited or no liquidity for a period of time. Some investments may require additional minimum net worth and/or net income. Troxell may also provide advice about any type of investment held in a client's portfolio.

Troxell's clients are advised to promptly notify Troxell if there are ever any changes in their financial situation or investment objectives or if they wish to impose any reasonable restrictions upon Troxell's management services.

Troxell also offers advisory services designed to assist retirement plan sponsors (Plan Sponsors) in meeting their fiduciary obligations to participants. Troxell Retirement plan services may include plan design assistance, service provider selection and oversight, fee benchmarking, asset allocation, investment management process and participant experience.

Financial Planning

Troxell offers integrated financial planning services which include a review of all aspects of a client's current financial situation or limited to certain areas of financial planning (a la carte financial planning). Areas of analysis that may be included in an integrated financial plan are: retirement planning, education planning, major purchase planning, life insurance needs, disability income insurance needs, long-term care needs and estate planning needs. A description of each area of financial planning is described below:

Retirement Planning: A written analysis will be prepared which will evaluate a client's retirement readiness. Retirement readiness is defined as one's ability to replace a percentage of pre-

retirement income throughout retirement. Important factors include but are not limited to: desired retirement age, assets available for retirement, inflation, investment rate of return, lifestyle expenses, tax rates and minimum asset level required at death. Approximate time needed to complete Retirement Planning is 2 to 10 hours.

Education Planning: A written analysis will be prepared that will project future college education expenses and the required savings to meet those expenses. Important factors include but are not limited to: number of children attending college, school of choice, existing assets available for future college expenses, projected number of years of attending college, inflation, investment rate of return. Approximate time needed to complete Education Planning is estimated to be 1 to 5 hours.

Major Purchase Planning: A written analysis will be prepared that will project the future savings required to achieve a major purchase goal such as a second home or start a business. Important factors include but are not limited to: desired future goal amount, existing assets available for future goal, inflation and investment rate of return. Approximate time needed to complete Major Purchase Planning is estimated to be 1 to 5 hours.

Life Insurance Needs: A written analysis will be prepared that will calculate the desired amount of life insurance a client should presently own. Important factors include but are not limited to: Family size, family income, age, percentage of income to replace, lifestyle expenses, amount of existing life insurance, current assets, health, funding for future college expenses, net worth, emergency fund requirements, liabilities, inflation and investment rate of return. Approximate time needed to complete Life Insurance Needs Planning is 4 to 12 hours.

Disability Income Insurance Needs: A written analysis will be prepared that will calculate the desired amount of disability income insurance a client should own. Important factors include but are not limited to: Family income, age, health, years to retirement, life style expenses, percentage of income to replace, current assets, inflation and investment rate of return. Approximate time needed to complete Disability Income Insurance Needs Planning is estimated to be 1 to 5 hours.

Long Term Care Needs: A written analysis will be prepared that will estimate the future cost of potential long-term care expenses and the effect those expenses may have on a client's net worth and lifestyle. Important factors include but are not limited to: Age, health, income, current assets, desired percentage of LTC expenses to cover, inflation and investment rate of return. Approximate time needed to complete Long-Term Care Needs Planning is estimated to be 1 to 5 hours.

Estate Planning Needs: A written analysis will be prepared that will: estimate future federal and state estate taxes, provide strategies to minimize estate taxes and provide recommended action steps to implement desired estate planning goals. Clients will obtain a report to share with their estate planning attorney in order for the creation of estate planning documents. Important factors include but are not limited to: composition of net worth, income, taxes, current estate planning documents, inflation and investment rate of return. Approximate time needed to complete Estate Planning is estimated to be 4 to 15 hours.

Clients understand that when Troxell is asked to perform an al a carte financial planning engagement, the client's overall financial status may not be taken into consideration. A signed engagement letter will be used to establish and define the client / planner relationship.

In order to perform the financial planning engagement, Troxell may request financial and personal information such as sources of income, assets/investments, liabilities, insurance policies, income tax returns, wills, trusts and personal and family obligations.

After analyzing and evaluating a client's financial status goals and objectives, a written financial plan with recommendations will be presented to the client. Troxell will then assist in the implementation of agreed upon strategies. The client is under no obligation to utilize additional services of Troxell and its representatives and is under no obligation to implement the advice or plan. Clients may choose all, none or certain specific components of advice and recommendations and may implement recommendations through service providers of their choice.

Sponsor and Manager of Wrap Program

Troxell does not participate in a Wrap Fee Program.

Fiduciary Statement

Troxell and its employees are fiduciaries who must take into consideration the best interests of the Firm's clients. Troxell will act with competence, dignity, integrity, and in an ethical manner, when dealing with clients. Troxell will use reasonable care and exercise independent professional judgement when conducting investment analysis, making investment recommendations, trading, promoting our services, and engaging in other professional activities.

As a fiduciary, Troxell has the obligation to deal fairly with clients. Troxell has the following responsibilities when working with a client:

- To render impartial advice;
- To make appropriate recommendations based on the client's needs, financial circumstances and investment objectives;
- To exercise a high degree of care and diligence to ensure that information is presented in an accurate manner and not in a way to mislead;
- To have reasonable basis, information, and understanding of the facts in order to provide appropriate recommendations and representations;
- Disclose any material conflict of interest in writing; and
- Treat clients fairly and equitably.

Client Assets

As of December 31, 2017, Troxell managed \$157,352,816 in assets under management; all assets are managed on a discretionary basis.

Item 5: Fees and Compensation

Troxell, depending upon the engagement, offers its services on a fee basis which may include hourly and/or fixed fees as well as fees based upon assets under management.

In certain circumstances, fees, account minimums and payment terms are negotiable depending on a client's unique situation – such as the size of the aggregate related party portfolio size, family holdings, low cost basis securities, or certain passively advised investments and pre-existing relationships with clients. Certain clients may pay more-or-less than others depending on the amount of assets, type of portfolio, or the time involved, the degree of responsibility

assumed, complexity of the engagement, special skills needed to solve problems, and application of experience and knowledge of the client's situation.

Compensation – Portfolio Management Services

Annual portfolio management fees, are as follows:

ACCOUNT SIZE	ADVISORY FEE
\$5,000,000 and OVER	Negotiable
\$3,500,000 to \$4,999,999	0.60 %
\$2,500,000 to \$3,499,999	0.70 %
\$1,750,000 to \$2,499,999	0.80 %
\$1,250,000 to \$1,749,999	0.90%
\$ 750,000 to \$1,249,999	1.00%
\$ 500,000 to \$ 749,999	1.10 %
\$ 250,000 to \$ 499,999	1.20 %
\$ 150,000 to \$ 249,999	1.30 %
\$ 100,000 to \$ 149,999	1.40 %
\$ 15,000 to \$ 99,999	1.50 %

Advisory fees are debited or billed quarterly in advance and are calculated based on the market value of the account on the last day of the previous quarter. For the first quarter during which the account is opened, the fee is charged in arrears. It is prorated based on the market value at the time cash is deposited or assets are transferred into the account and the number of days remaining in the quarter. Fees are negotiable. Fees will be debited from the account in accordance with the client authorization in the client agreement.

The advisory fee is deducted from the account by the custodian of the assets based on a written authorization from the client.

If the agreement is terminated before the end of the billing quarter, the client is entitled to a prorated refund of any pre-paid advisory fee based on the number of days remaining in the quarter after the termination date. In addition, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees if the client has not received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract.

Compensation – Financial Planning

Financial Planning Services are available to all clients. Fees will be charged in one of two ways:

- On an hourly basis of \$50 per hour (for clerical or para professional work) or \$250 per hour (for all work handled by the adviser); or
- As a fixed fee, typically ranging from \$1,000 to \$7,000, depending on the nature and complexity of each client's circumstances, and the number of areas of analysis the client chooses. Financial Planning areas of analysis may include:
 - Retirement Goal Planning – \$2,500 or less
 - Estate Planning and Estate Tax Analysis - \$5,000 or less
 - Life Insurance Needs Analysis - \$2,500 or less
 - Long Term Care Needs Analysis - \$1,000 or less
 - Disability Insurance Needs Analysis - \$1,000 or less

- Major Purchase Goal Planning - \$1,000 or less
- Education Planning - \$1,000 or less

It is the client's choice to be billed on an hourly basis or fixed fee bases. Typically, fees are quoted on an hourly basis for ala carte engagements – one or two areas of analysis and on a fixed fee basis for integrated engagements – three or more areas of analysis. Fees are influenced by such factors as the scope of work performed, complexity of a client's situation and amount of data to be gathered. Fees are negotiable and will be documented in the client's financial planning engagement agreement. Fees include all client meetings necessary to complete and present/deliver the financial plan. All financial planning fees are due in arrears, upon presentation of the financial plan or engagement with the client. Each integrated plan takes approximately 21 hours to complete.

For ongoing services, there is an annual maintenance fee of \$1,200. Ongoing services include:

- Annual Client Update and Financial Plan Review Meeting
- Financial Account and Rewards Program Aggregation
- Asset Allocation Consulting
- Personal Financial Statement
- Virtual Vault

Annual maintenance fees are paid in advance.

If a Financial Planning agreement is terminated before the end of the billing period, the client is entitled to a prorated refund of any pre-paid fee based upon the total fee less the time and services spent on the engagement prior to the termination. In addition, the financial planning contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees if the client has not received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract.

Other Fees

Clients may incur certain charges imposed by the Financial Institution(s) and other third parties such as custodial fees, charges imposed directly by a mutual fund or exchange traded fund in the account, which shall be disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Troxell's Agreement and/or the separate agreement with the Financial Institution(s) may authorize Troxell through the Financial Institution(s) to debit the client's account for Troxell's fee and to directly remit that management fee to Troxell in accordance with applicable custody rules. The Financial Institution(s) recommended by Troxell have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid directly to Troxell.

Commissions or Sales Charges for Recommendations of Securities

In the event the client desires, the client can engage certain persons associated with Troxell to render securities brokerage services under a commission arrangement. Clients are under no obligation to engage such persons and may choose brokers or agents not affiliated with Troxell. Under this arrangement, the client may implement securities transactions through certain of Troxell's Investment Advisor Representatives, in their respective individual capacities as

registered representatives of a broker/dealer. Brokerage commissions may be charged by the broker/dealer to affect these securities transactions and thereafter, a portion of these commissions may be paid by the broker/dealer to such Investment Advisor Representatives. Prior to effecting any transactions, the client will be required to enter into a new account agreement with the broker/dealer. The brokerage commissions charged by the broker/dealer may be higher or lower than those charged by other broker-dealers. In addition, certain of Troxell's Investment Advisor Representatives, may also receive additional ongoing 12b-1 fees for mutual fund purchases from the mutual fund company during the period that the client maintains the mutual fund investment.

While Troxell does not sell such securities products to its investment advisory clients, Troxell does permit its Investment Advisor Representatives, in their individual capacities as registered representatives of a broker/dealer, to sell securities products to its investment advisory clients. A conflict of interest exists to the extent that Troxell recommends the purchase of securities where Troxell's Investment Advisor Representatives receive commissions or other additional compensation because of Troxell's recommendations. Troxell has procedures in place to ensure that any recommendations made by such Investment Advisor Representatives are in the best interest of clients regardless of any additional compensation earned.

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

Neither Troxell nor any of its Supervised Persons (employees) accepts performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Troxell does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7: Types of Clients

Portfolio management services are offered to individuals, high net worth individuals, pension and profit sharing plans, and corporations or other business entities. Financial planning services are offered to individuals.

Troxell requires a minimum account of \$15,000 for portfolio management services, although this may be negotiable under certain circumstances. Troxell may group certain related client accounts for the purposes of achieving the minimum account size.

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

Troxell often utilizes fundamental analysis which attempts to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the

overall market regardless of the economic and financial factors considered in evaluating the securities.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

Troxell may recommend the use of Independent Manager(s) for certain clients. Troxell will continue to perform ongoing due diligence of such managers, but such recommendations rely, to a great extent, on the Independent Manager(s)' ability to successfully implement their investment strategy. In addition, Troxell does not have the ability to supervise the Independent Manager(s) on a day-to-day basis, if at all.

Troxell may recommend the use of options for certain clients. Options allow Troxell to hedge (limit) certain losses on positions clients hold. The option allows Troxell to buy or sell a security at a certain price (not the current market price). Clients pay a fee for the option. If the option falls outside the money (i.e. the market price of the security does not justify repurchasing/selling the security at the option price), the client will lose the fee for that option.

Note: All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends and other distributions), and the loss of future earnings. Although we manage the assets in a manner consistent with risk tolerances, there can be no guarantee that our efforts will be successful. The investor should be prepared to bear the risk of loss.

Troxell's investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar next year will not buy as much as a dollar today, 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.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Troxell or the integrity of Troxell management. Troxell has no information to disclose applicable to this Item.

Item 10: Other Financial Industry Activities and Affiliations

Troxell is not registered as and does not have an application pending as a securities broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor.

Kevin Crumly, Scott Norris and Ryan Davlin are each Registered Representatives of Mutual Securities. In addition to its investment advisory activities, Troxell offers retail brokerage services through its Registered Representatives who are affiliated with Mutual Securities. Products may include stocks, bonds, mutual funds, ETFs, 529 plans, retirement plans, variable life insurance, variable annuities and other investments. Troxell generally conducts its investment advisory activities separate and apart from the advisory activities of Mutual Securities.

Troxell is a licensed insurance broker in the state of Illinois. Investment Advisor Representatives (IARs) of Troxell may be appointed with several insurance companies and may be able to receive separate compensation for transactions implemented through various insurance companies. Clients are not obligated to use any company for insurance product purchases and may work with any insurance agent they choose. Insurance compensation will be separate and distinct from financial planning and portfolio management fees charged by Troxell.

As noted above, Troxell may recommend the use of Independent Manager(s) for certain clients. Troxell does not receive compensation for these recommendations.

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

Troxell employees must comply with a Code of Ethics and Statement for Insider Trading. The Code describes Troxell's high standard of business conduct, and fiduciary duty to its clients. The Code's key provisions include:

- Statement of General Principles

- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

The Chief Compliance Officer reviews all employee trades each month. These reviews ensure that personal trading does not affect the markets, and that clients of Troxell receive preferential treatment.

Troxell employees must acknowledge the terms of the Code of Ethics at least annually. Any individual not in compliance with the Code of Ethics may be subject to termination.

Clients and prospective clients can obtain copies of Troxell's Code of Ethics by contacting Kevin Crumly at 217.321.3210.

Troxell and its employees may buy or sell securities identical to those recommended to clients for their personal accounts. The Code of Ethics, described above, is designed to assure that the personal securities transactions, activities and interests of the employees of Troxell will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities, primarily mutual funds, have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Troxell clients. In addition, the Code requires pre-clearance of certain transactions. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics and designed to reasonably prevent conflicts of interest between Troxell and its clients.

Troxell and its employees do not recommend to clients, or buy or sell for client accounts, securities in which they have a material financial interest.

Troxell will not affect any principal or agency cross securities transactions for client accounts. Troxell will also not cross trades between client accounts.

Participation or Interest in Client Transactions – Aggregation

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

Item 12: Brokerage Practices

Troxell has no written or verbal arrangements whereby it receives soft dollars

Troxell does not receive client referrals from broker/dealers.

As discussed above, in Item 5, Troxell may recommend that clients utilize the brokerage and clearing services of certain broker/dealers.

Troxell Participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/SIPC/NFA. TD Ameritrade is an independent and unaffiliated SEC registered broker/dealer. TD Ameritrade offers to independent investment Advisors, services which include custody of securities, trade execution, clearance, and settlement of transactions. Troxell receives some benefits from TD Ameritrade through its participation in the program.

As disclosed above, Troxell participates in TD Ameritrade's institutional customer program and Troxell may recommend TD Ameritrade to you for custody and brokerage services. There is no direct link between our participation in the Program and the investment advice Troxell gives you, although Troxell receives economic benefits through our participation in the Program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving our participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to your accounts); the ability to have advisory fees deducted directly from your accounts; access to an electronic communications network for order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by our related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit us but may not benefit your accounts. These products or services may assist us in managing and administering your accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits received by us or our personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of our fiduciary duties to you, Troxell endeavors at all times to put your interests first. You should be aware, however, that the receipt of economic benefits by us or our related persons in and of itself creates a potential conflict of interest and may indirectly influence our choice of TD Ameritrade for custody and brokerage services.

Commissions or Sales Charges for Recommendations of Securities

As discussed above, certain Investment Advisor Representatives in their respective individual capacities are registered representatives of a broker/dealer and may receive commissions for their recommendation of certain securities. Troxell is cognizant of its duty to obtain best execution and has implemented policies and procedures reasonably designed in such pursuit.

Support Provided by Financial Institutions

Troxell may receive the following benefits from the broker/dealer: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its registered investment advisor group participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares

to client accounts; and access to an electronic communication network for client order entry and account information.

Trade Aggregation

Troxell may aggregate trades for multiple accounts. Orders for the same security entered on behalf of more than one client may be aggregated (i.e., blocked or bunched) subject to the aggregation being in the best interests of all participating clients. If the order is filled at different prices during the day, the prices are averaged for the day so that all participating accounts receive the same price. If an order has not been filled completely so that there are not enough shares to allocate among all the clients equally, shares will be allocated in good faith, based on the following considerations: amount of cash in the account, existing asset allocation and industry exposure, risk profile, and type of security. If a partial execution is attained at the end of the trading day, Troxell will generally allocate shares on a pro rata basis, but may fill small orders entirely before applying the pro rata allocation. All clients participating in each aggregated order shall receive the average price and subject to minimum ticket charges, pay a pro-rata portion of commissions.

Troxell's allocation procedure seeks to be fair and equitable to all clients with no particular group or client(s) being favored or disfavored over any other clients.

Accounts for Troxell or its employees may be included in a block trade with client accounts.

Item 13: Review of Accounts

The Troxell Investment Committee is comprised of Kevin Crumly, President and Chief Compliance Officer; Scott Norris, Vice President; Ryan Davlin, Wealth Manager; Courtney Babiak, Chief Operations Officer and Wealth Advisor; Erin Crumly, Operations Manager; David Crumly, Technical Analyst and Ward Douglas Cantrall, Jr., Wealth Advisor. Each Committee member is also a primary client manager. The Committee meets regularly to discuss overall firm investment philosophy to consistently apply to client accounts regardless of the primary client manager.

Each client is assigned a primary relationship manager. The primary relationship manager has the responsibility for communicating with the client, updating changes to the client's situation and risk tolerance the client's portfolio including the asset allocation and the specific assets included in the account. The client review includes comparing the portfolio and current security positions with the goals and objectives as outlined by the investment policy statement, reviewing changes to the client's investment circumstances, evaluating the specific holdings, re-balancing the portfolio and communicating the current status of the portfolio and any recommended actions to the client.

Clients' accounts are reviewed regularly; formal reviews, which may include contact with clients, typically occur each month.

Reviews may also be conducted if there are changes in market, political or economic conditions, tax laws, new investment information, and/or changes in a client's own situation.

At least quarterly, the custodian provides clients with an account statement for each client account, which may include individual holdings, cost basis information, deposits and

withdrawals. In addition, the custodian provides clients with trade confirmations for each position bought and sold. Troxell Financial provides clients with quarterly performance reports.

Financial Planning – Reviews and Reporting

Financial Planning and Consulting clients will be reviewed as contracted at the inception of the engagement.

Item 14: Client Referrals and Other Compensation

Troxell does not receive any economic benefits (other than normal compensation and benefits described in Item 12) from any firm or individual for providing investment advice.

Compensation – Client Referrals

Troxell does not currently make or accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Item 15: Custody

Clients may authorize Troxell (in the client agreement) to debit fees directly from the client's account at the Custodian(s). The Custodian(s) is/are advised in writing of the limitation of Troxell access to the account. The Custodian(s) sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to Troxell.

As described above and in Item 13, clients receive at least quarterly statements from the Custodian(s) that holds and maintains client's investment assets. Clients are urged to carefully review such statements and compare such official custodial records to the reports that Troxell may provide. Troxell reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

Troxell may accept limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows Troxell to execute trades on behalf of clients.

When such limited powers exist between Troxell and the client, Troxell has the authority to determine, without obtaining specific client consent, both the amount and type of securities to be bought to satisfy client account objectives. Additionally, Troxell may accept any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to Troxell in writing.

If Troxell has not been given discretionary authority, Troxell consults with the client prior to each trade.

Item 17: Voting Client Securities

Unless otherwise agreed to in writing, Troxell does not have any authority to and does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies for securities maintained in their portfolios; clients receive these proxies directly from either the broker/dealer or transfer agents.

If requested, Troxell may provide advice to clients regarding proxy votes. If any conflict of interest exists, it will be disclosed to the client. Clients may contact Kevin Crumly at 217.321.3210 for information about proxy voting.

Item 18: Financial Information

Troxell has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

Troxell does not require prepayment of fees of both more than \$1,200 per client, **and** more than six months in advance; and therefore, is not required to provide a balance sheet to clients.

Form ADV Part 2B – Investment Adviser Brochure Supplement

Crumly and Associates, Incorporated
dba Troxell Financial
Form ADV Part 2B
Investment Adviser Brochure Supplement

Supervisor: Kevin Crumly

Supervised Persons:

Scott Norris
Ryan Davlin
Courtney Babiak
Ward Douglas Cantrall, Jr.

October 2018

This brochure supplement provides information about the Firm's Supervised Persons that supplements Troxell Financial's brochure. You should have received a copy of that brochure. Please contact Kevin Crumly, President and Chief Compliance Officer if you did not receive Troxell Financial's brochure or if you have any questions about the contents of this supplement.

Additional information about the Firm's Supervised Persons is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number for each Supervised Person.

214 South Grand Avenue West
Springfield, IL 62704
217.321.3210
kevin.crumly@troxellfinancial.com
www.troxellfinancial.com

Item 2: Educational Background and Business Experience

Troxell generally requires that advisers in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Additionally, advisers must have work experience that demonstrates their aptitude for financial planning and investment management.

Kevin Crumly
CRD# 2447307

Born 1957

Employment History (5 years):

Troxell Financial
President and Chief Compliance Officer

2011 – Present

Mutual Securities
Registered Representative

2018 – Present

LPL Financial
Registered Representative

1998 – 2018

Formal Education after High School:

MBA, University of Illinois
Bachelor of Business, Western Illinois University

Professional Designations and Licenses:

Certified Public Accountant (CPA)
Certified Financial Planner (CFP®)
Accredited Investment Fiduciary® (AIF®)
IL Life and Health Insurance licenses

Professional Certifications

Troxell supervised persons maintain professional designations, which required the following minimum requirements:

CPA – Certified Public Accountant

Issued by: State Boards of Accountancy

Prerequisites/Experience Required: Candidate must meet the following requirements:

- Minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA);
- Successful passing of the Uniform CPA Examination

Educational Requirements:

- At minimum, a college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting);

Examination Type: Uniform CPA Examination

Continuing Education/Experience Requirements: Completion of 40 hours of continuing professional education each year (or 80 hours over a two-year period) in order to maintain a CPA license

CFP® – Certified Financial Planner

Issued by: Certified Financial Planner Board of Standards, Inc.

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP® Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2 years

AIF® – Accredited Investment Fiduciary®

Issued by: fi360 (Fiduciary 360)

Prerequisites/Experience Required: The AIF designation prerequisites are based on a point system – an AIF Designation candidate must earn a minimum of three (3) points per the valuation framework, which may include the following:

- Bachelor's, Master's, or Doctoral/JD Degree
- Maintenance of certain securities license(s) - Series 7, 65, and/or 66, and/or
- Maintenance of the AAMS, CRPS, PPC, or other comparable credential
- Maintenance of the CFA, CFP®, CIMA®, CPA, CLU, or ChFC designation
- Relevant Industry Experience of more than 2 years

Additional Requirements:

- Meet the prerequisites and qualification and conduct standards
- Attest to a code of ethics
- Maintain current contact information in fi360's designee database
- Remit \$325 in annual dues

Examination Type: None

Continuing Professional Education Requirements: 6 hours every year with at least 4 hours coming from fi360-produced sources

Item 3: Disciplinary Information

Troxell is required to disclose all pertinent facts regarding any legal or disciplinary events that would be material to your evaluation of Troxell or the integrity of Troxell's supervised persons. Kevin Crumly has no material events to disclose under this item.

Item 4: Other Business Activities

Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations.

Kevin Crumly is a Registered Representative of Mutual Securities. Advisory services are provided separately and independently of the broker/dealer.

Kevin Crumly may also be appointed with several insurance companies and may be able to receive separate compensation for transactions implemented through various insurance companies. Clients are not obligated to use any company for insurance product purchases and may work with any insurance agent they choose. Insurance compensation will be separate and distinct from financial planning and portfolio management fees charged by Troxell.

Item 5: Additional Compensation

No Supervised Person receives any economic benefit outside of regular salaries or bonuses except as described in Form ADV Part 2A Items 10 and 12.

Item 6: Supervision

Kevin Crumly, President and Chief Compliance Officer, supervises all persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Kevin Crumly supervises these persons by holding regular staff, investment and other ad hoc meetings. In addition, Kevin Crumly regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Kevin Crumly may be reached at 217.321.3210.

Item 2: Educational Background and Business Experience

Troxell generally requires that advisers in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Additionally, advisers must have work experience that demonstrates their aptitude for financial planning and investment management.

Scott Norris
CRD# 4153601

Born 1977

Employment History (5 years):

Troxell Financial Wealth Manager	2011 – Present
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Mutual Securities Registered Representative	2018 – Present
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LPL Financial Registered Representative	2004 – 2018
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Formal Education after High School:

Bachelor of Business, Finance, Western Illinois University

Professional Designations and Licenses:

Certified Financial Planner (CFP®)
Accredited Investment Fiduciary® (AIF®)
IL Life and Health Insurance licenses

Professional Certifications

Scott Norris maintains professional designations, which required the following minimum requirements:

CFP® – Certified Financial Planner

Issued by: Certified Financial Planner Board of Standards, Inc.

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA
- ChFC

- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP® Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2 years

AIF® – Accredited Investment Fiduciary®

Issued by: fi360 (Fiduciary 360)

Prerequisites/Experience Required: The AIF designation prerequisites are based on a point system – an AIF Designation candidate must earn a minimum of three (3) points per the valuation framework, which may include the following:

- Bachelor's, Master's, or Doctoral/JD Degree
- Maintenance of certain securities license(s) - Series 7, 65, and/or 66, and/or
- Maintenance of the AAMS, CRPS, PPC, or other comparable credential
- Maintenance of the CFA, CFP®, CIMA®, CPA, CLU, or ChFC designation
- Relevant Industry Experience of more than 2 years

Additional Requirements:

- Meet the prerequisites and qualification and conduct standards
- Attest to a code of ethics
- Maintain current contact information in fi360's designee database
- Remit \$325 in annual dues

Examination Type: None

Continuing Professional Education Requirements: 6 hours every year with at least 4 hours coming from fi360-produced sources

Item 3: Disciplinary Information

Troxell is required to disclose all pertinent facts regarding any legal or disciplinary events that would be material to your evaluation of Troxell or the integrity of Troxell's supervised persons. Scott Norris has no material events to disclose under this item.

Item 4: Other Business Activities

Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations.

Scott Norris is a Registered Representative of Mutual Securities. Advisory services are provided separately and independently of the broker/dealer.

Scott Norris may also be appointed with several insurance companies and may be able to receive separate compensation for transactions implemented through various insurance companies. Clients are not obligated to use any company for insurance product purchases and may work with any insurance agent they choose. Insurance compensation will be separate and distinct from financial planning and portfolio management fees charged by Troxell.

Item 5: Additional Compensation

Scott Norris does not receive any economic benefit outside of regular salaries or bonuses except as described in Form ADV Part 2A Items 10 and 12.

Item 6: Supervision

Kevin Crumly, President and Chief Compliance Officer, supervises all persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Kevin Crumly supervises these persons by holding regular staff, investment and other ad hoc meetings. In addition, Kevin Crumly regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Kevin Crumly may be reached at 217.321.3210.

Item 2: Educational Background and Business Experience

Troxell generally requires that advisers in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Additionally, advisers must have work experience that demonstrates their aptitude for financial planning and investment management.

Ryan Davlin
CRD# 5442481

Born 1983

Employment History (5 years):

Troxell Financial Wealth Manager	2011 – Present
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Mutual Securities Registered Representative	2018 – Present
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LPL Financial Registered Representative	2010 – 2018
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Formal Education after High School:

BA, Business Administration, University of Illinois Springfield

Professional Designations:

Certified Financial Planner (CFP®)
Accredited Investment Fiduciary® (AIF®)
PPC™ (Professional Plan Consultant)
IL Life and Health Insurance licenses

Professional Certifications

Ryan Davlin maintains professional designations, which required the following minimum requirements:

CFP® – Certified Financial Planner

Issued by: Certified Financial Planner Board of Standards, Inc.

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA

- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP® Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2 years

AIF® – Accredited Investment Fiduciary®

Issued by: fi360 (Fiduciary 360)

Prerequisites/Experience Required: The AIF designation prerequisites are based on a point system – an AIF Designation candidate must earn a minimum of three (3) points per the valuation framework, which may include the following:

- Bachelor's, Master's, or Doctoral/JD Degree
- Maintenance of certain securities license(s) - Series 7, 65, and/or 66, and/or
- Maintenance of the AAMS, CRPS, PPC, or other comparable credential
- Maintenance of the CFA, CFP®, CIMA®, CPA, CLU, or ChFC designation
- Relevant Industry Experience of more than 2 years

Additional Requirements:

- Meet the prerequisites and qualification and conduct standards
- Attest to a code of ethics
- Maintain current contact information in fi360's designee database
- Remit \$325 in annual dues

Examination Type: None

Continuing Professional Education Requirements: 6 hours every year with at least 4 hours coming from fi360-produced sources

PPC™ – Professional Plan Consultant

Issued by: Financial Service Standards, LLC

Prerequisites/Experience Required: Candidate must have three years of direct financial plan industry sales, service, and/or support experience

Educational Requirements: Candidate must complete a 16-hour 401k Service Training Program

Examination Type: Final certification exam (50-question, multiple choice, closed-book exam)

Continuing Professional Education Requirements: 12 hours every 2 years

Item 3: Disciplinary Information

Troxell is required to disclose all pertinent facts regarding any legal or disciplinary events that would be material to your evaluation of Troxell or the integrity of Troxell's supervised persons. Ryan Davlin has no material events to disclose under this item.

Item 4: Other Business Activities

Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations.

Ryan Davlin is a Registered Representative of Mutual Securities. Advisory services are provided separately and independently of the broker/dealer.

Ryan Davlin may also be appointed with several insurance companies and may be able to receive separate compensation for transactions implemented through various insurance companies. Clients are not obligated to use any company for insurance product purchases and may work with any insurance agent they choose. Insurance compensation will be separate and distinct from financial planning and portfolio management fees charged by Troxell.

Item 5: Additional Compensation

Ryan Davlin does not receive any economic benefit outside of regular salaries or bonuses except as described in Form ADV Part 2A Items 10 and 12.

Item 6: Supervision

Kevin Crumly, President and Chief Compliance Officer, supervises all persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Kevin Crumly supervises these persons by holding regular staff, investment and other ad hoc meetings. In addition, Kevin Crumly regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Kevin Crumly may be reached at 217.321.3210.

Item 2: Educational Background and Business Experience

Troxell generally requires that advisers in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Additionally, advisers must have work experience that demonstrates their aptitude for financial planning and investment management.

Courtney Babiak
CRD# 6142900

Born 1983

Employment History (5 years):

Troxell Financial Chief Operating Officer and Wealth Advisor	2016 – Present
Mutual Securities Licensed Admin	2018 – Present
LPL Financial Registered Representative	2014 – 2018
Peterman Financial Group Operations Manager/Strategic Wealth Advisor	2013 – 2016
Money Concepts International Associate Advisor	2013 – 2014
Money Concepts Capital Corp Associate	2013 – 2014

Formal Education after High School:

Master of Public Administration, University of Illinois Springfield
BA, Psychology, University of Illinois Springfield

Professional Designations:

Registered Financial Consultant (RFC®)

Professional Certifications

Courtney Babiak maintains a professional designation, which required the following minimum requirements:

RFC® – Registered Financial Consultant

Issued by: International Association of Registered Financial Consultants (IARFC)

Prerequisites/Experience Required: Candidates must meet the following education, experience and ethical requirements:

- Candidate either has attained a professional designation (i.e. CLU, ChFC, and CFP), or has earned a baccalaureate or graduate degree in financial planning with strong emphasis on subjects relating to economics, accounting, business, statistics, finance and similar studies; this granting institution must offer an IARFC-approved or CFP equivalent college curriculum and be an accredited college or university
- Met four years of experience, providing evidence of having met license requirements for securities plus life and health insurance, or submits RIA affiliation information
- Candidate must have a sound record of business integrity with no suspensions or revocation of any professional licenses

Educational Requirements: Candidates are required to complete a self-study process to attain the RFC designation. The preparation curriculum consists of ten volumes mirroring that of the CFP preparation, and covers the following six topics:

- Financial Planning Process
- Insurance Planning
- Retirement Planning
- Investment Planning
- Income Tax Planning
- Estate Planning

Examination Type: At the completion of the self-study process, candidates are required to take an untimed, 150-question multiple choice exam (approximately 3-5 hours)

Item 3: Disciplinary Information

Troxell is required to disclose all pertinent facts regarding any legal or disciplinary events that would be material to your evaluation of Troxell or the integrity of Troxell's supervised persons. Courtney Babiak has no material events to disclose under this item.

Item 4: Other Business Activities

Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations.

Courtney Babiak is a Registered Representatives of Mutual Securities. Advisory services are provided separately and independently of the broker/dealer.

Courtney Babiak may also be appointed with several insurance companies and may be able to receive separate compensation for transactions implemented through various insurance companies. Clients are not obligated to use any company for insurance product purchases and may work with any insurance agent they choose. Insurance compensation will be separate and distinct from financial planning and portfolio management fees charged by Troxell.

Item 5: Additional Compensation

Courtney Babiak does not receive any economic benefit outside of regular salaries or bonuses except as described in Form ADV Part 2A Items 10 and 12.

Item 6: Supervision

Kevin Crumly, President and Chief Compliance Officer, supervises all persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Kevin Crumly supervises these persons by holding regular staff, investment and other ad hoc meetings. In addition, Kevin Crumly regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Kevin Crumly may be reached at 217.321.3210.

Item 2: Educational Background and Business Experience

Troxell generally requires that advisers in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Additionally, advisers must have work experience that demonstrates their aptitude for financial planning and investment management.

Ward Douglas Cantrall Jr.
CRD# 7015740

Born 1987

Employment History (5 years):

Troxell Financial
Wealth Advisor

2018 – Present

Marine Bank
Vice President of Trust and Investment Management

2010 – 2018

Formal Education after High School:

BS- Mathematics, Southern Illinois University
AS- Applied Science, Lincoln Land Community College

Professional Designations and Licenses:

Certified Financial Planner (CFP®)

Professional Certifications

Troxell supervised persons maintain professional designations, which required the following minimum requirements:

CFP® – Certified Financial Planner

Issued by: Certified Financial Planner Board of Standards, Inc.

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP® Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2 years

Item 3: Disciplinary Information

Troxell is required to disclose all pertinent facts regarding any legal or disciplinary events that would be material to your evaluation of Troxell or the integrity of Troxell's supervised persons. Ward Douglas Cantrall Jr. has no material events to disclose under this item.

Item 4: Other Business Activities

Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations.

Item 5: Additional Compensation

No Supervised Person receives any economic benefit outside of regular salaries or bonuses except as described in Form ADV Part 2A Items 10 and 12.

Item 6: Supervision

Kevin Crumly, President and Chief Compliance Officer, supervises all persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Kevin Crumly supervises these persons by holding regular staff, investment and other ad hoc meetings. In addition, Kevin Crumly regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Kevin Crumly may be reached at 217.321.3210.