

Beck Bode, LLC

d/b/a Boston Retirement Advisors

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Beck Bode LLC dba Boston Retirement Advisors. If you have any questions about the contents of this brochure, please contact us at (617) 209-2224 or by email at: invest@beckbode.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Beck Bode LLC dba Boston Retirement Advisors is also available on the SEC's website at www.adviserinfo.sec.gov. The firm's CRD number is: 282611.

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Registration as an investment adviser does not imply a certain level of skill or training.

Version Date: 07/15/2019

Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Beck Bode, LLC on March 25, 2019 are described below. Material changes relate to Beck Bode, LLC's policies, practices or conflicts of interests.

- The firm has updated outside business activities (Item 10).

Item 3: Table of Contents

| | |
|---|-----|
| Item 1: Cover Page | |
| Item 2: Material Changes..... | ii |
| Item 3: Table of Contents..... | iii |
| 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 | 10 |
| Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss | 10 |
| Item 9: Disciplinary Information..... | 12 |
| Item 10: Other Financial Industry Activities and Affiliations..... | 13 |
| Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading..... | 14 |
| Item 12: Brokerage Practices | 15 |
| Item 13: Review of Accounts..... | 16 |
| Item 14: Client Referrals and Other Compensation..... | 17 |
| Item 15: Custody | 19 |
| Item 16: Investment Discretion..... | 19 |
| Item 17: Voting Client Securities (Proxy Voting) | 19 |
| Item 18: Financial Information..... | 20 |

Item 4: Advisory Business

A. Description of the Advisory Firm

Beck Bode LLC (hereinafter “Beck Bode”) d/b/a Boston Retirement Advisors is a Limited Liability Company organized in the State of Massachusetts. The firm was formed in February 2013, and the principal owners are Benjamin Willard Beck and James Allan Bode.

B. Types of Advisory Services

Portfolio Management Services

Beck Bode offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Beck Bode creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and long-term objectives) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific objectives. Portfolio management services may include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Regular portfolio monitoring
- Personal investment policy
- Asset selection

Beck Bode evaluates the current investments of each client with respect to their long-term objectives and time horizon. Beck Bode will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Long term objectives are documented in the Investment Policy Statement, which is given to each client.

Beck Bode seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Beck Bode’s economic, investment or other financial interests. To meet its fiduciary obligations, Beck Bode attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Beck Bode’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Beck Bode’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Subadviser Services

Beck Bode may also act as a subadviser to advisers unaffiliated with Beck Bode. These third-party advisers would outsource portfolio management services to Beck Bode. This

relationship will be memorialized in each contact between Beck Bode and the third-party adviser.

Pension Consulting Services

Beck Bode offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- portfolio management
- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options
- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker-dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

Services Limited to Specific Types of Investments

Beck Bode generally limits its investment advice to mutual funds, fixed income securities, equities and ETFs, although Beck Bode primarily recommends growth and dividend paying equities. Beck Bode may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

Beck Bode will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by Beck Bode on behalf of the client. Beck Bode will use a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Beck Bode recommends strategies and allocations that, in the firm's determination, best fit the client's long-term objectives.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent Beck Bode

from properly servicing the client account, or if the restrictions would require Beck Bode to deviate from its standard suite of services, Beck Bode reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. Beck Bode no longer accepts clients in a wrap fee program.

E. Assets Under Management

Beck Bode has the following assets under management:

| Discretionary Amounts: | Non-discretionary Amounts: | Date Calculated: |
|------------------------|----------------------------|------------------|
| \$254,702,000.00 | \$0.00 | December 2018 |

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

| Total Assets Under Management | Annual Fees |
|-------------------------------|-------------|
| All Assets | 2.00% |

The advisory fee is calculated using the value of the assets in the account on the last business day of the prior billing period. These fees are generally negotiable, and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of Beck Bode's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice.

Performance-Based Fees for Portfolio Management

Certain qualified clients will pay an annual fee of 2.00% of assets under management along with a 20.00% performance fee based on capital appreciation. If the client's portfolio rises in value, the client will pay 20.00% on that increase in value, but if the portfolio drops in value, the client will not incur a new performance fee until the portfolio reaches the last highest value, adjusted for withdrawals and deposits, which is generally known as a "high water mark." The high-water mark will be the highest value of the client's account on the

last day of any previous quarter, after accounting for the client's deposits or withdrawals for each billing period.

These fees are generally negotiable, and the final fee schedule will be memorialized in the client's advisory agreement. This service may be canceled with 30 days' notice. Clients must pay the prorated performance-based fees for the billing period in which they terminate the Investment Advisory Contract up to and including the day of termination.

Subadviser Services Fees

Beck Bode may also act as a subadviser to unaffiliated third-party advisers. The notice of termination requirement and payment of fees for subadviser services will depend on the specific third-party investment adviser engaging Beck Bode as subadviser. This relationship will be memorialized in each contract between Beck Bode and each third-party adviser. The fees will not exceed any limit imposed by any regulatory agency.

Pension Consulting Services Fees

Pension Plan consulting fees may be based on a percentage of the assets held in the Plan, on an hourly basis, or on a flat rate basis, as negotiated between the Plan and our representative. If based on a percentage of assets held in the Plan, our annual fee for retirement plan consulting will not exceed 3.00%. Fees will be payable to us in advance or in arrears on the frequency (e.g., quarterly, monthly, etc.) agreed upon. If asset-based fees are negotiated, payment generally will be based on the value of the Plan assets as of the close of business on the last business day of the period as valued by the custodian of the assets. However, if the fee is paid by the Plan or the client through a third-party service provider, such fee will be calculated as determined by the provider. If the fee is paid prior to the services being provided, the Plan will be entitled to a prorated refund of any prepaid fees for services not received upon termination of the client agreement. We will require a deposit of twenty (20%) of the estimated fee with the remainder due upon completion of the services rendered.

If a Plan engages us to provide ongoing investment recommendations to the Plan regarding the investment options (e.g., mutual funds, collective investment funds) to be made available to Plan participants, you should understand that there generally will be two layers of fees with respect to such assets. The Plan will pay an advisory fee to the fund manager and other expenses as a shareholder of the fund. The Plan will also pay us a fee for the investment recommendation services.

If a Plan makes available a variable annuity as an investment option, there are mortality, expense and administrative charges, fees for additional riders on the contract and charges for excessive transfers within a calendar year imposed by the variable annuity sponsor. If a Plan makes available a pooled guaranteed investment contract (GIC) fund, there are investment management and administrative fees associated with the pooled GIC fund.

Financial Planning Fees

Fixed Fees

The negotiated fixed rate for creating client financial plans is from \$1500 to \$12,000.

Hourly Fees

The negotiated hourly fee for these services is between \$100 to \$1,000.

Clients may terminate the agreement without penalty, for full refund of Beck Bode's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in advance.

Payment of Performance-Based Fees

Performance-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in arrears.

Payment of Subadviser Fees

Subadviser fees may be withdrawn from clients' accounts or clients may be invoiced for such fees, as disclosed in each contract between Beck Bode and the applicable third-party adviser.

Payment of Pension Consulting Services Fees

Pension consulting fees are withdrawn directly from the client's accounts with client's written authorization or may be invoiced and billed directly to the client. Clients may select the method in which they are billed. Fees are paid monthly or quarterly as agreed to by the client.

Payment of Financial Planning Fees

Financial planning fees are paid via check, 50% in advance (but never more than six months in advance) with the remainder due upon presentation of the plan.

C. Client Responsibility for Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Beck Bode. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

Beck Bode collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

For hourly fees that are collected in advance, the fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

E. Outside Compensation for the Sale of Securities to Clients

Neither Beck Bode nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

Beck Bode manages certain accounts that are billed on performance-based fees (a share of capital gains on or capital appreciation of the assets of a client) and may as well manage accounts that are not billed on performance-based fees. Managing both kinds of accounts at the same time presents a conflict of interest because Beck Bode and/or its supervised persons have an incentive to favor accounts for which Beck Bode receives a performance-based fee. Beck Bode addresses

the conflicts by ensuring that clients are not systematically advantaged or disadvantaged due to the presence or absence of performance-based fees. Beck Bode seeks best execution and upholds its fiduciary duty for all clients.

Clients paying a performance-based fee should be aware that investment advisers have an incentive to invest in riskier investments when paid a performance-based fee due to the higher risk/higher reward attributes.

Item 7: Types of Clients

Beck Bode generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Collective Investment Trusts
- ❖ Pension and Profit-Sharing Plans
- ❖ Other Investment Advisers

There is no account minimum for any of Beck Bode's services.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

Beck Bode's methods of analysis include Fundamental analysis and Quantitative analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Investment Strategies

Beck Bode uses long term trading and options trading (including covered options, uncovered options, or spreading strategies).

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Investment Strategies

Beck Bode's use of options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Options transactions involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Beck Bode's use of options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither Beck Bode nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither Beck Bode nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

William Ryan is the owner of Ryan Financial Strategies, INC, a tax preparation company. From time to time, he may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. Beck Bode, LLC always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any representative of Beck Bode, LLC in such individual's outside capacities.

Jeffery Earl McCormick is the owner of JEM Nursery that provides property management.

Jeffery Earl McCormick is a commercial building maintenance supervisor at SANICARE.

Jeffery Earl McCormick is a health insurance producer and agent at Sales of Health Insurance.

Jeffery Earl McCormick is a landscape designer at Landscape Impressions that provides landscape construction, sales and design.

Jeffery Earl McCormick is a board member at Village of Middleville Downtown Development Authority.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

Beck Bode does not utilize nor select third-party investment advisers.

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

A. Code of Ethics

Beck Bode has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Beck Bode's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

Beck Bode does not recommend that clients buy or sell any security in which a related person to Beck Bode or Beck Bode has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Beck Bode may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Beck Bode to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Beck Bode will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of Beck Bode may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Beck Bode to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, Beck Bode will never engage in trading that operates to the client's disadvantage if representatives of Beck Bode buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on Beck Bode's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Beck Bode may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Beck Bode's research efforts. Beck Bode will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Beck Bode will require clients to use Fidelity Brokerage Services LLC ("Fidelity"), Schwab Institutional, a division of Charles Schwab & Co., Inc. ("Schwab" or "Schwab Advisor Services"), TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC ("TD Ameritrade"), or LPL Financial, LLC.

1. Research and Other Soft-Dollar Benefits

While Beck Bode has no formal, written soft dollars agreements in which soft dollars are used to pay for third party services, Beck Bode may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). See the description of economic benefits under Item 14A. Beck Bode may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and Beck Bode does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. Beck Bode benefits by not having to produce or pay for the research, products or services, and Beck Bode will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that Beck Bode's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

Beck Bode receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

Beck Bode will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

If Beck Bode buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, Beck Bode would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. Beck Bode would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for Beck Bode's advisory services provided on an ongoing basis are reviewed at least monthly by Benjamin Beck, Chief Investment Officer, with regard to clients' respective investment policies and long term objectives. All accounts at Beck Bode are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Benjamin Beck, Chief Investment Officer. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, Beck Bode's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of Beck Bode's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan electronically through eMoney upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Schwab Advisor Services

With respect to Schwab, Beck Bode receives access to Schwab's institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For Beck Bode client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to Beck Bode other products and services that benefit Beck Bode but may not benefit its clients' accounts. These benefits may include national, regional or Beck Bode specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of personnel of Beck Bode by Schwab Advisor Services personnel, including meals,

invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist Beck Bode in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of Beck Bode's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of Beck Bode's accounts. Schwab Advisor Services also makes available to Beck Bode other services intended to help Beck Bode manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to Beck Bode by independent third parties. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Beck Bode. Beck Bode is independently owned and operated and not affiliated with Schwab.

TD Ameritrade

Beck Bode participates in the institutional advisor program (the "Program") offered by TD Ameritrade. TD Ameritrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. Beck Bode receives some benefits from TD Ameritrade through its participation in the Program.

As part of the Program, Beck Bode may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between Beck Bode's participation in the Program and the investment advice it gives to its clients, although Beck Bode receives economic benefits through its 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 Beck Bode participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have Beck Bode's fees deducted directly from client accounts; access to an electronic communications network for client 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 Beck Bode by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by Beck Bode's related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit Beck Bode but may not benefit its client accounts. These products or services may assist Beck Bode

in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Beck Bode manage and further develop its business enterprise. The benefits received by Beck Bode or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Beck Bode endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Beck Bode or its related persons in and of itself creates a conflict of interest and may indirectly influence the Beck Bode's choice of TD Ameritrade for custody and brokerage services.

B. Compensation to Non - Advisory Personnel for Client Referrals

Beck Bode does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, Beck Bode will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

Beck Bode provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Beck Bode generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, Beck Bode's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to Beck Bode).

Item 17: Voting Client Securities (Proxy Voting)

Beck Bode will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

Beck Bode neither requires nor solicits prepayment of more than \$1200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither Beck Bode nor its management has any financial condition that is likely to reasonably impair Beck Bode's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

Beck Bode has not been the subject of a bankruptcy petition in the last ten years.