



Item 1 - Form ADV Part 2 – Disclosure Brochure

Effective: February 2024

This Brochure provides information about the qualifications and business practices of Allos Investment Advisors, LLC (“Allos”). If you have any questions about the contents of this Brochure, please contact us at (913) 948-7788 or by email at info@allosadvisors.com.

Allos is a registered investment adviser registered with the United States Securities and Exchange Commission (“SEC”). The information in this Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an Investment Adviser does not imply any specific level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Allos and its advisory persons are available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 - Material Changes

On July 28, 2010, the U.S. Securities and Exchange Commission voted unanimously to adopt amendments to Part 2 of Form ADV and related rules under the Investment Advisers Act of 1940 (the “Advisers Act”). The amendments are designed to require a registered investment adviser to provide Clients with a clearly written and meaningful disclosure, in plain English, about the advisor’s business practices, conflicts of interest and advisory personnel. The new Form ADV 2 is divided into two parts, *Part 2A* and *Part 2B*.

Part 2A of the new Form (the “Firm Brochure”) provides information about a variety of topics relating to an adviser’s business practices and conflicts of interest. *Part 2B* of the new Form (the “Brochure Supplement”) requires an adviser to provide information about certain advisory personnel.

Allos believes that communication and transparency are the foundation of our relationship and continually strive to provide you with the complete and accurate information at all times. We encourage all current and prospective investors to read this Firm Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Annual Update Filing

Since our last annual filing on 03/10/2023, we have the following material changes to disclose:

- Following the Acquisition of TD Ameritrade Inc. by Charles Schwab & Co., Inc. Our firm now solely recommends the custodial services of Charles Schwab & Co., Inc. Please see items 12 and 14 of this brochure for additional information.

Future Changes

From time to time, we may amend this Firm Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Firm Brochure or this summary of Material Changes shall be provided to each Client annually or if a material change is made.

At any time, you may view the current Firm Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>.

To review the firm information for Allos, click **Investment Adviser Search** in the left navigation menu and enter, select the option for Investment Adviser Firm and enter **155541** (*our firm’s CRD number*) in the field labeled “Firm IARD/CRD Number:”. This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions.

You may also request a copy of this Firm Brochure at any time, by contacting us at info@allosadvisors.com or at (913) 948-7788.

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Item 4 - Advisory Services

A. Firm Information

Allos Investment Advisors, LLC ("Allos" or the "Advisor") is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"), which was organized as a limited liability company in the State of Kansas in October 2010. Allos is a wholly-owned subsidiary of Searcy Financial Services, Inc. ("Searcy"), a registered investment advisor at the same business address. Searcy was formed in 1976.

As the parent to Allos, Searcy provides day-to-day investment management services and operational support to Allos and its Clients.

B. Advisory Services Offered

Allos provides investment management services to individuals, trusts, estates, charitable organizations and businesses (each referred to as the "Client"). Allos practices custom management of portfolios, on a discretionary basis, according to the Client's objectives, time horizon and tolerance for risk. In certain limited circumstances, and within the sole discretion of Allos, Allos may provide non-discretionary investment management services. Allos emphasizes a long-term investment time horizon, where appropriate.

Allos primarily recommends that its Clients allocate investment management assets among various exchange-traded funds ("ETFs") and mutual funds as appropriate to achieve the Client's objectives. Allos may, at times, include individual debt and equity securities in the construction of portfolios. Allos may also use other security types and investments as appropriate to meet the objectives of a particular Client, as necessary.

Allos evaluates and selects ETFs and mutual funds for inclusion in Client portfolios only after applying a comprehensive due diligence process. As part of this analysis, Allos evaluates the style consistency, management fees, overall expense ratios, fund performance, manager tenure, and several other factors of each investment. Allos may recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. Allos may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. Allos may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of Client, or any risk deemed unacceptable for the Client's risk tolerance.

In addition, for those Clients that require an enhanced and/or specialized level of asset management services, Allos shall also recommend that certain Clients authorize the active discretionary management of a portion of their assets by and/or among certain independent investment manager[s] and/or investment programs (the "Independent Manager[s]"), based upon the stated investment objectives of the Client. The terms and conditions under which the Client will engage the Independent Manager[s] will be set forth in a separate written agreement between the Client and the designated Independent Manager[s]. Allos will continue to render services to the Client relative to the ongoing monitoring and review of account performance, asset allocation and Client investment objectives. Factors which Allos shall consider in recommending Independent Manager[s] include the Client's stated investment objective[s], management style, performance, reputation, financial strength, reporting, pricing, and research. The investment management fees charged by the designated Independent Manager[s], together with the fees charged by the corresponding designated broker-dealer/custodian of the Client's assets, are exclusive of, and in addition to, Allos' ongoing investment advisory fee as noted in Item 5 below.

Prior to rendering investment management services, Allos will ascertain, in conjunction with the Client, the Client's financial situation, risk tolerance, and investment objective(s).

B. Advisory Services Offered - continued

Allos will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will Allos accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated brokerage account, pursuant to the Client Investment Management Agreement.

C. Financial Planning Services Offered

If the Client chooses to engage Allos to provide financial planning, under an Allos+ financial planning and/or consulting agreement, then Client will also receive assistance with identifying financial goals, budgeting and cash flow planning, retirement income planning and educational planning. Prior to engaging Allos to provide financial planning services, each Client is required to enter into a Financial Planning Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. Any financial planning needs outside of the scope of the Allos+ subscription will be available on an hourly basis and outlined in writing before the completion of any work.

D. Client Account Management

Prior to engaging Allos to provide investment management services, each Client is required to enter into an Investment Management Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – Allos, in connection with the Client, will develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives. An Investment Policy Statement will include specific information on the Client's stated goals, time horizon for achieving their goals, asset allocation strategies, Client risk tolerance and any restrictions imposed by the Client.
- Determining Strategic Asset Allocation[s] – Allos will formulate a long-term strategic asset allocation for each Client account, consistent with their investment goals. The strategic asset allocation will specify the target percentages to be invested in various asset classes, including, but not limited to, domestic equity, domestic fixed income, international equity, international fixed income, cash and equivalents and other asset classes as appropriate for each Client's account. Asset Allocation Accounts are re-balanced and re-optimized when deemed necessary by the Advisor. Re-balancing is accomplished by reallocating assets to original asset targets and re-optimizing involves setting new target asset category percentages.
- Portfolio Construction – Allos will develop a portfolio for the Client that is intended to meet the stated goals of the Client. The portfolio will typically be managed by Searcy, the parent firm to the Advisor. All or a portion of the portfolio may also be managed by Independent Manager[s], if appropriate.
- Investment Management and Supervision – Allos will provide ongoing oversight of the Client's portfolio and overall account. Allos will delegate the day-to-day investment management activities to its parent, Searcy or to Independent Manager[s].

E. Wrap Fee Programs

Allos does not place Client assets into a wrap fee program. Investment management services are provided by Allos and its parent firm, Searcy. For Clients in which investment management is performed by an Independent Manager, Allos provides account supervision, asset allocation and Client account management.

F. Assets Under Management

As of December 2023, the most recent date for which such calculations are available, Allos manages the following assets:

| | |
|--------------------------|----------------------|
| Discretionary Assets | \$ 51,282,508 |
| Non-Discretionary Assets | \$0 |
| Total | \$ 51,282,508 |

Item 5 - Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for investment management services. Each Client shall sign an Investment Management Agreement that details the responsibilities of Allos and the Client.

A. Fees for Advisory Services

Investment Management Fees are paid quarterly, in advance of each calendar quarter based on the market value of assets under management at the end of the preceding quarter. Investment Management Fees in the first quarter of service are prorated from the inception date of the account to the end of the first quarter. Investment Management Fees are charged based on the following schedule.

| Assets Under Management | Annual Rate (%) |
|--------------------------------|------------------------|
| Up to \$25,000 | 1.90% |
| \$25,000 to \$99,999 | 1.50% |
| \$100,000 to \$249,999 | 1.35% |
| \$250,000 to \$499,999 | 1.25% |
| \$500,000 to \$749,999 | 1.15% |
| \$750,000 to \$999,999 | 1.05% |
| \$1,000,000 to \$1,999,999 | 1.00% |
| \$2,000,000 to \$3,999,999 | 0.75% |
| \$4,000,000 to \$5,999,999 | 0.60% |
| \$6,000,000 and over | 0.40% |

Investment Management Fees may be reduced or waived for directors, officers, and employees of Allos at the sole discretion of the Advisor. Investment Management Fees may be negotiated by Allos at its sole discretion. All securities held in a portfolio managed by Allos will be independently valued by the Custodian. Allos will not have the authority or responsibility to value portfolio securities.

B. Fees for Financial Planning Services

Allos+ Financial Planning is a subscription available to any Client who chooses to engage Allos to provide such services. The subscription fee is \$150 per month (\$1800 per year) for financial planning services. The agreement shall automatically renew annually.

C. Fee Billing

Investment Management Fees will be automatically deducted from the Client Account by the Custodian. The Advisor shall send a quarterly invoice to the Custodian indicating the amount of the fees to be deducted from the Client Account. The amount due is calculated by applying the annual rate in the table above to the total assets under management with Allos at the end of each quarter.

C. Fee Billing – continued

Each billing will be for a single quarter, paid in advance of the quarter. Clients will receive independent statements from the Custodian no less frequently than quarterly. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility.

D. Other Fees and Expenses

Charles Schwab & Co., Inc. ("Schwab"), does not charge transaction fees for U.S. listed equities and exchange traded funds.

Clients may incur certain fees or charges imposed by third-parties, other than Allos, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the Custodian and executing broker-dealer. The Investment Management Fee charged by Allos is separate and distinct from these Custodian and execution fees. In addition, all fees paid to Allos for Investment Management Services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in certain investments, without the services of Allos, but would not receive access to Advisor and Institutional shares classes.

The Client also would not receive the services provided by Allos which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial condition and objectives. Accordingly, the Client should review both the fees charged by the fund(s) and the fees charged by Allos to fully understand the total fees to be paid.

E. Advance Payment of Fees and Termination

As noted, above, Allos is compensated for its services in advance of each quarter for investment management services to be provided. Clients may request to terminate their Investment Management Agreement with Allos, in whole or in part, by providing thirty (30) days advance written notice. The Client shall be responsible for Investment Management Fees up to and including the effective date of termination. The Client's Investment Management Agreement with the Advisor is non-transferable without Client's written approval.

Financial Planning subscriptions are due and payable on an annual basis, but may be broken down into monthly payments for the convenience of the Client. The client may terminate financial planning services by providing 30 days written notice. Any unpaid financial planning fees for the current 12-month subscription period will be due and payable at that time.

F. Compensation for Sales of Securities

Allos does not receive commissions or any compensation for transactions in any Client account. As a fee-only Advisor, Allos is paid only on the advice and investment management provided to Clients based on the assets under management in the Client's account(s).

Item 6 - Performance-Based Fees

Allos does not charge performance-based fees for its investment advisory services. The fees charged by Allos are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

Allos does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options for its Clients.

Item 7 - Types of Clients

Allos provides investment management services primarily to individuals, high net worth individuals and trusts. Allos does not impose a minimum account fee. Allos provides customized services to meet the unique needs of each Client. Additional details are contained in Item 4 - Advisory Services.

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

A. Methods of Analysis

Allos primarily employs fundamental analysis methods in developing investment strategies for its Clients. Allos typically delegates the investment management to its parent firm, Searcy. Research and analysis from Allos and/or Searcy is derived from numerous sources, including financial media companies, third-party research materials, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others. Allos and/or Searcy also obtain information from regulatory reports and other sources as appropriate. The Advisor also utilizes information obtained from regulatory releases, the Internet, information provided at conferences and other information obtained from regulatory sources.

As noted above, Allos generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Allos will typically hold all or a portion of a security for more than a year, but for adjustments made for the purposes of re-balancing or re-optimizing the portfolio. At times, Allos may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class, or based upon macro-economic considerations.

B. Investment Strategies

Exchange Traded Funds ("ETFs"): An ETF is a type of Investment Company (usually, an open-end fund or unit investment trust) whose primary objective is to achieve the same return as a particular market index. The vast majority of ETFs are designed to track an index, so their performance is close to that of an index mutual fund, but they are not exact duplicates. A tracking error, or the difference between the returns of a fund and the returns of the index, can arise due to differences in composition, management fees, expenses, and handling of dividends. ETFs benefit from continuous pricing; they can be bought and sold on a stock exchange throughout the trading day. Because ETFs trade like stocks, you can place orders just like with individual stocks - such as limit orders, good-until-canceled orders, stop loss orders etc. They can also be sold short. Traditional mutual funds are bought and redeemed based on their net asset values ("NAV") at the end of the day. ETFs are bought and sold at the market prices on the exchanges, which resemble the underlying NAV but are independent of it. However, arbitrageurs will ensure that ETF prices are kept very close to the NAV of the underlying securities. Although an investor can buy as few as one share of an ETF, most buy in board lots. Anything bought in less than a board lot will increase the cost to the investor. Anyone can buy any ETF no matter where in the world it trades. This provides a benefit over mutual funds, which generally can only be bought in the country in which they are registered.

One of the main features of ETFs are their low annual fees, especially when compared to traditional mutual funds. The passive nature of index investing, reduced marketing, and distribution and accounting expenses all contribute to the lower fees. However, individual investors must pay a brokerage commission to purchase and sell ETF shares; for those investors who trade frequently, this can significantly increase the cost of investing in ETFs. That said, with the advent of low-cost brokerage fees, small or frequent purchases of ETFs are becoming more cost efficient.

B. Investment Strategies - continued

Equity Securities: Equity securities represent an ownership position in a company. Equity securities typically consist of common stocks. The prices of equity securities fluctuate based on, among other things, events specific to their issuers and market, economic and other conditions. For example, prices of these securities can be affected by financial contracts held by the issuer or third parties (such as derivatives) relating to the security or other assets or indices. There may be little trading in the secondary market for particular equity securities, which may adversely affect our firm's ability to value accurately or dispose of such equity securities. Adverse publicity and investor perceptions, whether or not based on fundamental analysis, may decrease the value and/or liquidity of equity securities. Investing in smaller companies may pose additional risks as it is often more difficult to value or dispose of small company stocks, more difficult to obtain information about smaller companies, and the prices of their stocks may be more volatile than stocks of larger, more established companies. Clients should have a long-term perspective and, for example, be able to tolerate potentially sharp declines in value.

Mutual Funds: A mutual fund is a company that pools money from many investors and invests that money in a variety of differing security types based on the objectives of the fund. The portfolio of the fund consists of the combined holdings it owns. Each share represents an investor's proportionate ownership of the fund's holdings and the income those holdings generate. The price that investors pay for mutual fund shares are the fund's per share net asset value ("NAV") plus any shareholder fees that the fund imposes at the time of purchase (such as sales loads). Investors typically cannot ascertain the exact make-up of a fund's portfolio at any given time, nor can they directly influence which securities the fund manager buys and sells or the timing of those trades. With an individual stock, investors can obtain real-time (or close to real-time) pricing information with relative ease by checking financial websites or by calling a broker or your investment adviser. Investors can also monitor how a stock's price changes from hour to hour – or even second to second. By contrast, with a mutual fund, the price at which an investor purchases or redeems shares will typically depend on the fund's NAV, which is calculated daily after market close.

The benefits of investing through mutual funds include: (a) Mutual funds are professionally managed by an investment adviser who researches, selects, and monitors the performance of the securities purchased by the fund; (b) Mutual funds typically have the benefit of diversification, which is an investing strategy that generally sums up as "Don't put all your eggs in one basket." Spreading investments across a wide range of companies and industry sectors can help lower the risk if a company or sector fails. Some investors find it easier to achieve diversification through ownership of mutual funds rather than through ownership of individual stocks or bonds; (c) Some mutual funds accommodate investors who do not have a lot of money to invest by setting relatively low dollar amounts for initial purchases, subsequent monthly purchases, or both; and (d) At any time, mutual fund investors can readily redeem their shares at the current NAV, less any fees and charges assessed on redemption.

Mutual funds also have features that some investors might view as disadvantages: (a) Investors must pay sales charges, annual fees, and other expenses regardless of how the fund performs. Depending on the timing of their investment, investors may also have to pay taxes on any capital gains distributions they receive. This includes instances where the fund performed poorly after purchasing shares; (b) Investors typically cannot ascertain the exact make-up of a fund's portfolio at any given time, nor can they directly influence which securities the fund manager buys and sells or the timing of those trades; and (c) With an individual stock, investors can obtain real-time (or close to real-time) pricing information with relative ease by checking financial websites or by calling a broker or your investment adviser. Investors can also monitor how a stock's price changes from hour to hour – or even second to second. By contrast, with a mutual fund, the price at which an investor purchases or redeems shares will typically depend on the fund's NAV, which the fund might not calculate until many hours after the investor placed the order. In general, mutual funds must calculate their NAV at least once every business day, typically after the major U.S. exchanges close.

When investors buy and hold an individual stock or bond, the investor must pay income tax each year on the dividends or interest the investor receives. However, the investor will not have to pay any capital gains tax until the investor actually sells and makes a profit. Mutual funds, however, are different. When an investor buys and

B. Investment Strategies - continued

holds mutual fund shares, the investor will owe income tax on any ordinary dividends in the year the investor receives or reinvests them. Moreover, in addition to owing taxes on any personal capital gains when the investor sells shares, the investor may have to pay taxes each year on the fund's capital gains. That is because the law requires mutual funds to distribute capital gains to shareholders if they sell securities for a profit, and cannot use losses to offset these gains.

Cash & Cash Equivalents: Cash and cash equivalents generally refer to either United States dollars or highly liquid short-term debt instruments such as, but not limited to, treasury bills, bank CD's and commercial papers. Generally, these assets are considered nonproductive and will be exposed to inflation risk and considerable opportunity cost risk. Investments in cash and cash equivalents will generally return less than the advisory fee charged by our firm. Our firm may recommend cash and cash equivalents as part of our clients' asset allocation when deemed appropriate and in their best interest. Our firm considers cash and cash equivalents to be an asset class. Therefore, our firm assesses an advisory fee on cash and cash equivalents unless indicated otherwise in writing.

C. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Allos will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

Allos generally employs investment strategies that do not involve any significant or unusual risk other than domestic equity and international market risks. The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. Please remember that different types of investments involve varying degrees of risk, including the possible loss of principal and that past performance may not be indicative of future results. Therefore, it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies undertaken by Allos) will be profitable.

Allos attempts to minimize risk and generally does not recommend investing in initial public offerings (IPO's), options, futures, warrants, derivatives, master limited partnerships, exchange traded notes (ETN's), hedge funds or funds of hedge funds, viatical agreements, life settlements, life settlement-backed securities (death bonds), senior settlements, private placements, unregistered securities, promissory notes, or any transaction involving real property, tangible property or tangible personal property.

For more information on our investment management services, please contact us at info@allosadvisors.com or at (913) 948-7788.

Item 9 - Disciplinary Information

Allos and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>.

To review the firm information for Allos, click **Investment Adviser Search** in the left navigation menu and enter, select the option for Investment Adviser Firm and enter **155541** (*our firm's CRD number*) in the field labeled "Firm IARD/CRD Number:". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions.

There are no legal, regulatory or disciplinary events involving Allos or any of its employees.

Item 10 - Other Financial Activities and Affiliations

Allos is a wholly-owned subsidiary of Searcy Financial Services, Inc. ("Searcy"), also a registered investment advisor with the U.S. Securities and Exchange Commission. Searcy provides integrated financial planning and wealth management services for its Clients. Searcy provides day-to-day investment management services to Allos and its Clients.

Certain advisory persons of our firm and/or Searcy are licensed insurance agents. Advisory Persons and/ or Allos do not offer insurance products to clients nor do they refer clients to Allos' parent company, Searcy, for the purchase of insurance products.

To review information on Searcy, you may also visit the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>. Enter **105807** (*Searcy's CRD number*) in the field labeled "Firm IARD/CRD Number:" This will provide access to Form ADV Parts 1 and 2 for Searcy.

Allos provides investment management services to its Clients and is not involved in any other business activity.

Item 11 - Code of Ethics, Participation in Client Transactions and Personal Trading

A. Code of Ethics

Allos recognizes that the personal investment transactions of members and employees of our firm demand the application of a high Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client.

At the same time, we believe that if investment goals are similar for clients and for members and employees of our firm, it is logical and even desirable that there be common ownership of some securities.

Therefore, in order to prevent conflicts of interest, we have in place a set of procedures (including a pre-clearing procedure) with respect to transactions effected by our members, officers and employees for their personal accounts. In order to monitor compliance with our personal trading policy, we have a quarterly securities transaction reporting system for all of our associates.

Furthermore, Allos has established a Code of Ethics which applies to all of our associated persons. An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. Allos has a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. Allos requires all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. All related persons of Allos are required to report

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violations of the code of ethics to the chief compliance officer. Allos and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients.

Our firm provides investment advice to assets affected by the Department of Labor ("DOL") Fiduciary Rule for a level fee. As such, we abide by the Impartial Conduct Standards as defined by the DOL. To comply with these standards, our firm and our advisors give advice that is in our clients' best interest, charge no more than reasonable compensation (within the meaning of ERISA Section 408(b)(2) and Internal Revenue Code Section 4975(d)(2), and make no misleading statements about investment transactions, compensation, conflicts of interest, and any other matters related to investment decisions.

A. Code of Ethics Continued

As a level-fee fiduciary, we maintain a non-variable compensation structure that is provided on the basis of a fixed percentage of the value of assets or a set fee that does not vary with the particular investment recommended, as opposed to a commission or other transaction based fee.

Allos has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at info@allosadvisors.com or at (913) 948-7788.

B. Material Interests

Neither Allos nor any related person recommends to clients, or buys or sells for client accounts, securities in which our firm or a related person has a material financial interest.

As a fee only registered investment advisor ("RIA"), Allos does not have a broker-dealer relationship and has no incentive to sell securities products of any kind to its Clients.

C. Personal Trading

Related persons of Allos may buy or sell securities and other investments that are also recommended to clients. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request.

D. Conflicts of Interest

Related persons of our firm may buy or sell securities for themselves at or about the same time they buy or sell the same securities for client accounts. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request. Further, our related persons will refrain from buying or selling the same securities prior to buying or selling for our clients in the same day. If related persons' accounts will be block traded along with client accounts, and if they are not included in a block trade, our related persons will always trade personal accounts last.

Item 12 - Brokerage Practices

Custodian & Brokers Used

Our firm does not maintain custody of client assets (although our firm may be deemed to have custody of client assets if give the authority to withdraw assets from client accounts. See Item 15 Custody, below). Client assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. Our firm recommends that clients use the Schwab Advisor Services division of Charles Schwab & Co. Inc. ("Schwab"), a FINRA-registered broker-dealer, member SIPC, as the qualified custodian. Allos also recommends the custodial

services of Axos Clearing, LLC. Our firm is independently owned and operated, and not affiliated with Schwab or Axos. Schwab and Axos will hold client assets in a brokerage account and buy and sell securities when instructed. While our firm recommends that clients use Schwab and Axos as custodians/brokers, clients will decide whether to do so and open an account with Schwab or Axos by entering into an account agreement directly with them. Our firm does not open the account. Even though the account is maintained at either Schwab or Axos, our firm can still use other brokers to execute trades.

How Brokers/Custodians Are Selected

Our firm seeks to recommend a custodian/broker who will hold client assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. A wide range of factors are considered, including, but not limited to:

- combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- capability to execute, clear and settle trades (buy and sell securities for client accounts)
- capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.)
- availability of investment research and tools that assist in making investment decisions quality of services
- competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them
- reputation, financial strength and stability of the provider
- prior service to our firm and our other clients
- availability of other products and services that benefit our firm, as discussed below (see “*Products & Services Available from Schwab*”)

Custody & Brokerage Costs

Schwab generally does not charge a separate fee for custody services, but is compensated by charging commissions or other fees to clients on trades that are executed or that settle into the Schwab account. For some accounts, Schwab may charge your account a percentage of the dollar amount of assets in the account in lieu of commissions. Schwab’s commission rates and/or asset-based fees applicable to client accounts were negotiated based on our firm’s commitment to maintain a minimum threshold of assets statement equity in accounts at Schwab. This commitment benefits clients because the overall commission rates and/or asset-based fees paid are lower than they would be if our firm had not made the commitment. In addition to commissions or asset-based fees, Schwab charges a flat dollar amount as a “prime broker” or “trade away” fee for each trade that our firm has executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into a Schwab account. These fees are in addition to the commissions or other compensation paid to the executing broker-dealer. Because of this, in order to minimize client trading costs, our firm has Schwab execute most trades for the accounts.

Products & Services Available from Schwab

Schwab Advisor Services is Schwab’s business serving independent investment advisory firms like our firm. They provide our firm and clients, with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help manage or administer our client accounts while others help manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (our firm does not have to request them) and at no charge to our firm. The availability of Schwab’s products and services is not based on the provision of particular investment advice, such as purchasing particular securities for clients. Here is a more detailed description of Schwab’s support services:

Services that Benefit Clients

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which our firm might not otherwise have access or that would require a significantly higher minimum initial investment by firm clients. Schwab's services described in this paragraph generally benefit clients and their accounts.

Services that May Not Directly Benefit Clients

Schwab and Axos also makes available other products and services that benefit our firm but may not directly benefit clients or their accounts. These products and services assist in managing and administering our client accounts. They include investment research, both from Schwab, Axos and that of third parties. This research may be used to service all or some substantial number of client accounts, including accounts not maintained at Schwab or Axos. In addition to investment research, Schwab and Axos also makes available software and other technology that:

- provides access to client account data (such as duplicate trade confirmations and account statements);
- facilitates trade execution and allocate aggregated trade orders for multiple client accounts;
- provides pricing and other market data;
- facilitates payment of our fees from our clients' accounts; and
- assists with back-office functions, recordkeeping and client reporting.

Services that Generally Benefit Only Our Firm

Schwab and Axos also offer other services intended to help manage and further develop our business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

Schwab and Axos may provide some of these services itself. In other cases, Schwab and Axos will arrange for third-party vendors to provide the services to our firm. Schwab and Axos may also discount or waive fees for some of these services or pay all or a part of a third party's fees. Schwab and Axos may also provide our firm with other benefits, such as occasional business entertainment for our personnel.

Irrespective of direct or indirect benefits to our client through Schwab or Axos, our firm strives to enhance the client experience, help clients reach their goals and put client interests before that of our firm or associated persons.

Our Interest in Schwab's Services.

The availability of these services from Schwab and Axos benefits our firm because our firm does not have to produce or purchase them. Our firm does not have to pay for these services, and they are not contingent upon committing any specific amount of business to Schwab or Axos in trading commissions or assets in custody.

In light of our arrangements with Schwab and Axos, a conflict of interest exists as our firm may have incentive to require that clients maintain their accounts with Schwab based on our interest in receiving Schwab's or Axos' services that benefit our firm rather than based on client interest in receiving the best value in custody services and the most favorable execution of transactions. As part of our fiduciary duty to our clients, our firm will endeavor at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by our firm or our related persons creates a potential conflict of interest and may indirectly influence our

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firm's choice of Schwab and Axos as custodial recommendations. Our firm examined this potential conflict of interest when our firm chose to recommend Schwab or Axos and have determined that the recommendations are in the best interest of our firm's clients and satisfies our fiduciary obligations, including our duty to seek best execution.

In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Although our firm will seek competitive rates, to the benefit of all clients, our firm may not necessarily obtain the lowest possible commission rates for specific client account transactions. Our firm believes that the selection of Schwab as a custodian and broker is the best interest of our clients. It is primarily supported by the scope, quality and price of Schwab's services, and not Schwab's services that only benefit our firm.

Soft Dollars, Brokerage referrals and Directed Brokerage

As part of its fiduciary duties to clients, Allos endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefit by Allos or its related persons in and of itself creates a potential conflict of interest and may indirectly influence Allos's choice of Custodian for custody and brokerage services. Allos's Clients do not pay more for investment transactions effected and/or assets maintained at our Custodians as result of this arrangement. There is no corresponding commitment made by Allos to our Custodians or any other entity to invest any specific amount or percentage of Client assets in any specific mutual funds, ETFs, securities or other investment products as result of the above arrangement.

- 1) **Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an adviser enters into an agreement to place security trades with the broker in exchange for research and other services. Allos does not participate in soft dollar programs sponsored or offered by any broker-dealer. However, in an effort to keep our clients informed as to the services we offer and the various financial products we utilize, our employees may attend conferences or events subsidized by product providers. These events/trips are educational in nature and are not dependent upon the use of any specific products. While a conflict of interest may exist given that these events/trips are at least partially funded by product sponsors, we will always adhere to our fiduciary duties in selecting appropriate investments for our clients.
- 2) **Brokerage Referrals** - Allos does not receive any compensation from our Custodians or any other entity in connection with the recommendation for establishing a brokerage account.
- 3) **Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Allos will place trades within the established account[s] at the Custodian designated by the Client. Further all Client accounts are traded within their respective brokerage account[s]. The Adviser will not engage in any principal transactions (i.e., trade of any security from or to the Adviser's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the Custodian, Allos will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated Custodian.

Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Allos will execute its transactions through an unaffiliated broker-dealer selected by the Client. Allos may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written

statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Item 13 - Review of Accounts

A. Frequency of Reviews

Accounts are monitored on an ongoing basis by Allos for adherence to investment strategy and Client Objective. Investment management and supervision over the securities contained in the Client's portfolio are performed on an ongoing basis by Allos and/or the Independent Manager[s], as applicable.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account.

The Client is encouraged to notify Allos if changes occur in his/her personal financial situation that might adversely affect his/her investment plan.

Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Trustee or Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s].

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by Allos

Our firm receives economic benefit from Schwab in the form of the support products and services made available to our firm and other independent investment advisors that have their clients maintain accounts at Schwab. These products and services, how they benefit our firm, and the related conflicts of interest are described above (see Item 12 - Brokerage Practices). The availability of Schwab's products and services is not based on our firm giving particular investment advice, such as buying particular securities for our clients.

Allos does not receive any benefits from Axos Clearing, LLC outside of what is disclosed in item 12 of this brochure.

B. Client Referrals from Promoter

In accordance with Rule 206 (4)-1 of the Investment Advisers Act of 1940, our firm provides cash or non-cash compensation directly or indirectly to unaffiliated persons for testimonials or endorsements (which include client referrals). Such compensation arrangements will not result in higher costs to the referred client. In this regard, our firm maintains a written agreement with each unaffiliated person that is compensated for testimonials or endorsements in an aggregate amount of \$1,000 or more (or the equivalent value in non-cash compensation) over a trailing 12-month period in compliance with Rule 206 (4)-1 of the Investment Advisers Act of 1940 and applicable state and federal laws. The following information will be disclosed clearly and prominently to referred prospective clients at the time of each testimonial or endorsement:

- Whether or not the unaffiliated person is a current client of our firm,
- A description of the cash or non-cash compensation provided directly or indirectly by our firm to the unaffiliated person in exchange for the referral, if applicable, and
- A brief statement of any material conflicts of interest on the part of the unaffiliated person giving the referral resulting from our firm's relationship with such unaffiliated person.

In cases where state law requires licensure of solicitors, our firm ensures that no solicitation fees are paid unless the solicitor is registered as an investment adviser representative of our firm. If our firm is paying solicitation fees to another registered investment adviser, the licensure of individuals is the other firm's responsibility.

Item 15 – Custody

All Clients must place their assets in a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct Allos to utilize that custodian for the Client's security transactions. For more information about custodians and brokerage practices, see Item 12. Brokerage Practices.

The SEC issued a no-action letter ("Letter") with respect to the Rule 206(4)-2 ("Custody Rule") under the Investment Advisers Act of 1940 ("Advisers Act"). The letter provided guidance on the Custody Rule as well as clarified that an adviser who has the power to disburse client funds to a third party under a standing letter of instruction ("SLOA") is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with the account custodian:

- The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
- The client has the ability to terminate or change the instruction to the client's qualified custodian.
- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16 – Investment Discretion

Allos generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Allos. Discretionary authority will only be authorized upon full disclosure to the Client.

The granting of such authority will be evidenced by the Client's execution of an Investment Management Agreement containing all applicable limitations to such authority. All discretionary trades made by Allos will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Allos does not accept proxy voting responsibility for any Client. Therefore, although Allos may provide investment advisory services relative to Client investment assets, Allos Clients maintain exclusive responsibility

for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the Client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Allos and/or the Client shall correspondingly instruct the Custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

Item 18 - Financial Information

Neither Allos, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Allos is not required to deliver a balance sheet along with this brochure as the firm does not collect advance fees for services to be performed six months or more in advance. Allos charges fees for only the immediate quarter for which it will provide services. Please see Item 5. Fees and Compensation for additional information.