

FOURSTAR WEALTH ADVISORS, LLC

a Registered Investment Adviser

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This brochure provides information about the qualifications and business practices of FourStar Wealth Advisors, LLC (hereinafter “FourStar” or the “Firm”). If you have any questions about the contents of this brochure, please contact the Firm at this telephone number listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Additional information about the Firm is available on the SEC’s website at www.adviserinfo.sec.gov. The Firm is a registered investment adviser. Registration does not imply any level of skill or training.

Item 2. Material Changes

In this Item, FourStar is required to discuss any material changes that have been made to the brochure. The following material changes to this document since our last filing on March 8, 2024.

Item 4 was updated to provide private fund management services.

Item 5 was updated to discuss fees pertaining to private fund management.

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Item 4. Advisory Business

FourStar offers a variety of advisory services, which include financial planning and investment management services. Prior to FourStar rendering any of the foregoing advisory services, clients are required to enter into one or more written agreements with FourStar setting forth the relevant terms and conditions of the advisory relationship (the “Advisory Agreement”).

FourStar started conducting business in June 2014 and is principally owned by Brian Kasal through the Brian L. Kasal Living Trust DTD March 20, 1998, and Kasal Family 2014 Investment Trust, which, in turn, own FourStar Holdings, LLC, a direct owner of FourStar. As of December 31, 2023, FourStar has \$1,018,874,410 in assets under management, all of which are managed on a discretionary basis.

While this brochure generally describes the business of FourStar, certain sections also discuss the activities of its Supervised Persons, which refer to the Firm’s officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees or any other person who provides investment advice on FourStar’s behalf and is subject to the Firm’s supervision or control.

Financial Planning Services

FourStar offers clients a broad range of financial planning services, which include the following functions:

- | | |
|-----------------------------|-------------------------|
| • Business Planning | • Retirement Planning |
| • Cash Flow Forecasting | • Charitable Giving |
| • Trust and Estate Planning | • Distribution Planning |
| • Financial Reporting | • Tax Planning |
| • Investment Consulting | • Insurance Planning |

While each of these services is available on a stand-alone basis, certain of them may also be rendered in conjunction with investment portfolio management as part of a comprehensive wealth management engagement (described in more detail below).

With regard to Charitable Giving, certain Supervised Persons of the Firm have specific knowledge of structures and procedures regarding tax efficient transfer of assets to heirs and to non-profits and other charities. Mr. Kasal holds the designation Chartered Advisor of Philanthropy, specific coursework sponsored by the American College. Firm may engage clients who are donors to assist in the process as part of an overall financial planning process or a specific donor process.

In performing these services, FourStar is not required to verify any information received from the client or from the client’s other professionals (e.g., attorneys, accountants, etc.) and is expressly authorized to

rely on such information. FourStar may recommend clients engage the Firm for additional related services, its Supervised Persons in their individual capacities as insurance agents or registered representatives of a broker-dealer and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists if clients engage FourStar or its affiliates to provide additional services for compensation. Clients retain absolute discretion over all decisions regarding implementation and are under no obligation to act upon any of the recommendations made by FourStar under a financial planning engagement. Clients are advised that it remains their responsibility to promptly notify the Firm of any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising FourStar's recommendations and/or services.

Investment and Wealth Management Services

FourStar manages client investment portfolios on a discretionary or non-discretionary basis. In addition, FourStar may provide clients with wealth management services which generally include a broad range of comprehensive financial planning services as well as management of investment portfolios.

FourStar primarily allocates client assets among various mutual funds, exchange-traded funds ("ETFs"), individual debt and equity securities, options, and independent investment managers ("Independent Managers") in accordance with their stated investment objectives. In addition, FourStar may also recommend that certain eligible clients invest in privately placed securities, which may include debt, equity and/or interests in pooled investment vehicles (e.g., hedge funds).

Where appropriate, the Firm may also provide advice about any type of legacy position or other investments held in client portfolios. Clients may engage FourStar to manage and/or advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance and annuity contracts and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, FourStar directs or recommends the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company, or the custodian designated by the product's provider.

FourStar tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. FourStar consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of their portfolios. Clients are advised to promptly notify FourStar if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients may impose reasonable restrictions or mandates on the management of their accounts if FourStar determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts.

Retirement Plan Consulting Services

FourStar provides various consulting services to qualified employee benefit plans and their fiduciaries. This suite of institutional services is designed to assist plan sponsors in structuring, managing and optimizing their corporate retirement plans. Each engagement is individually negotiated and customized, and may include any or a ll of the following services:

- Plan Design and Strategy
- Plan Review and Evaluation
- Executive Planning & Benefits
- Investment Selection
- Plan Fee and Cost Analysis
- Plan Committee Consultation
- Fiduciary and Compliance
- Participant Education

As disclosed in the Advisory Agreement, certain of the foregoing services are provided by FourStar as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). In accordance with ERISA Section 408(b)(2), each plan sponsor is provided with a written description of FourStar’s fiduciary status, the specific services to be rendered and all direct and indirect compensation the Firm reasonably expects under the engagement.

Retirement Plan Rollover Recommendations

When we provide investment advice about your retirement plan account or individual retirement account (“IRA”) including whether to maintain investments and/or proceeds in the retirement plan account roll over such investments from the retirement plan account to an IRA or make a distribution from the retirement plan account, we acknowledge that the firm is a “fiduciary” within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code as applicable. The way that the firm makes money creates conflicts with your interests so the firm operates under a special rule that requires that firm to act in your best interest and not put our interests ahead of yours.

Under this special rule’s provisions, the firm must act as a fiduciary to a retirement plan account or IRA under ERISA/the Internal Revenue Code by:

- Meeting a professional standard of care when making investment recommendations (i.e., give prudent advice);
- Never putting the interests of the firm ahead of you when making recommendations (i.e., give loyal advice);
- Avoiding misleading statements about conflicts of interest, fees, and investments;
- Following policies and procedures designed to ensure that the firm gives advice that is in your best interest;
- Charging no more than is reasonable for the services of the firm; and
- Giving you basic information about any conflicts of interest.

To the extent that we recommend that you roll over your account to an account managed by the firm, please know that the firm and its investment advisor representatives have an inherent conflict of interest. Increased investment advisory fees may be earned by recommending that you roll over your account to an account managed by the firm. We will earn fewer investment advisory fees if you do not roll over the funds to an account managed by the firm. Thus, our investment advisor representatives have an economic incentive to recommend a rollover of funds to an account managed by the firm which is a conflict of interest because our recommendation that you open the account to be managed by the firm can be based on our economic incentive and not based exclusively on whether or not moving the funds is in your overall best interest.

We have taken steps to manage this conflict of interest. We have adopted an impartial conduct standard whereby our investment adviser representatives will (i) provide investment advice to a retirement plan participant regarding a rollover of funds from the retirement plan in accordance with the fiduciary status described below, (ii) not recommend investments which result in the firm receiving unreasonable

compensation related to the rollover of funds, and (iii) fully disclose compensation received by the firm and our supervised persons and any material conflicts of interest related to recommending the rollover of funds and refrain from making any materially misleading statements regarding such rollover.

When providing advice to you regarding a rollover, our investment adviser representatives will act with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims, based on the investment objectives, risk, tolerance, financial circumstances, and a client's needs, without regard to the financial or other interests of the firm or our affiliated personnel.

Some of our investment adviser representatives are also registered representatives with a broker-dealer. In their capacity as registered representatives, these persons will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by these persons in their capacities as registered representatives is separate from our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on your needs.

In addition, some of our investment adviser representatives are also licensed as insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate from our advisory fees. See the Fees and Compensation section in this brochure for more information on the compensation received by insurance agents who are affiliated with our firm.

In addition to these commissions/fees, opening an investment account carries with it costs beyond the advisory fee(s) the firm charges. When placing a transaction order to buy or sell securities, advisory clients may have to pay any or all of the following charges in addition to the advisory fees charged by this firm:

- Brokerage commissions
- Custodian fees
- Postage charges
- Processing charges
- Ticket charges
- Early surrender fees
- Transfer fees
- Administrative fees for investments in mutual funds;
- Account maintenance fees charged by a broker dealer for an account, especially if inactive;
- Third party administrator ("TPA") and record keeping fees

Use of Independent Managers

As mentioned above, FourStar may select certain Independent Managers to actively manage a portion of its clients' assets. The specific terms and conditions under which a client engages an Independent Manager may be set forth in a separate written agreement with the designated Independent Manager. In addition to this brochure, clients may also receive the written disclosure documents of the respective Independent Managers engaged to manage their assets.

FourStar evaluates a variety of information about Independent Managers, which may include the Independent Managers' public disclosure documents, materials supplied by the Independent Managers themselves and other third-party analyses it believes are reputable. To the extent possible, the Firm seeks to assess the Independent Managers' investment strategies, past performance, and risk results in relation to its clients' individual portfolio allocations and risk exposure. FourStar also takes into consideration each Independent Manager's management style, returns, reputation, financial strength, reporting, pricing and research capabilities, among other factors.

FourStar continues to provide services relative to the discretionary selection of the Independent Managers. On an ongoing basis, the Firm monitors the performance of those accounts being managed by Independent Managers. FourStar seeks to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests.

Firm Assets as of 12/31/2023	U.S. Dollar Amount	Total Number of Accounts
Discretionary:	(a) \$1,018,874,410	(d) 2940
Non-Discretionary:	(c) \$0.00	(e) 0
Total:	(f) \$1,018,874,410	(g) 2940

Private Fund Management

FourStar provides management services for private funds. In doing so, we exercise discretion over assets placed in the fund(s). In exercising this discretion, we are obligated to adhere to the stated investment objectives including any restrictions on investments as outlined in the fund documents. From time to time, our advisors may recommend the purchase of interests in a fund managed by our firm. In such instances, any assets placed in the fund will be charged a management fee through the fund, and you will not be charged a separate advisory fee. Any recommendation to purchase interests in a fund managed by the firm must be in the client's best interest.

Item 5. Fees and Compensation

FourStar offers services on a fee basis, which may include fixed and/or hourly fees, as well as fees based upon assets under management or advisement. Additionally, certain of the Firm's Supervised Persons, in their individual capacities, may offer insurance products under a separate commission-based arrangement.

Financial Planning Fees

FourStar may charge different fees, under a stand-alone agreement, depending upon the scope and complexity of the financial plan. A standard fixed fee will commensurate based on the financial planning services provided. Additional planning modules may have fees in aggregate for the financial plan. If the client engages the Firm for additional investment advisory services, FourStar may offset all or a portion of its fees for those services based upon the amount paid for the financial planning services.

The terms and conditions of the financial planning engagement are set forth in the Advisory Agreement and FourStar generally requires one-half of the fee (estimated hourly or fixed) payable upon execution of the Advisory Agreement. The outstanding balance is generally due upon delivery of the financial plan or completion of the agreed upon services. The Firm does not, however, take receipt of \$500 or more in prepaid fees in excess of six months in advance of services rendered.

Investment Management Fees

FourStar offers investment management services for an annual fee based on the amount of assets under the Firm's management. This management fee is based upon a graduated scale or a flat fee program or a combination of the two, based on client needs. Such flat fees are based on the complexity of the client's needs.

Fees may also be charged based on hourly rates, which vary from \$200 to \$500 per hour. Alternatively, fees may be charged on a project basis. Project fees may apply to all client types and may be negotiated for each unique engagement prior to beginning project work.

The annual fee is prorated and charged quarterly, in advance, based upon the market value of the assets being managed by FourStar on the last day of the previous billing period.

Where FourStar provides wealth management services which generally include a broad range of comprehensive financial planning services as well as management of investment portfolios, the Firm may offer these services on a fixed fee basis. Fees will be individually negotiated and may vary based on the scope of services to be rendered.

If assets are deposited into (\$25,000 min) or withdrawn (\$100,000 min) from an account after the inception of a billing period, the fee payable with respect to such assets is adjusted to reflect the interim change in portfolio value. For the initial period of an engagement, the fee is calculated on a *pro rata* basis. In the event the advisory agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding or unearned portion of the fee is charged or refunded to the client, as appropriate.

Additionally, for asset management services the Firm provides with respect to certain client holdings (e.g., held-away assets, accommodation accounts, alternative investments, etc.), FourStar may negotiate a fee rate that differs from the range set forth above.

Retirement Plan Consulting Fees

FourStar charges an annual asset-based fee to provide clients with retirement plan consulting services in conjunction with managing a plan's assets. Fees range between 25 basis points (0.25%) and 200 basis points (2.0%). We may charge a separate fee for additional consulting projects beyond the specific plan engaged. Each engagement is individually negotiated and tailored to accommodate the needs of the individual plan sponsor, as memorialized in the Agreement.

Private Fund Management

When FourStar manages private funds, we are entitled to charge a management fee. Such fees are always disclosed in the fund offering documents and are charged as a percentage of assets invested in the fund. While the percentage varies, it is typically between 1.50%-2.00%. Importantly, client assets invested in the fund are used to calculate this management fee, but you will not be charged a separate advisory fee with respect to such assets.

Fee Discretion

FourStar may, in its sole discretion, negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship, account retention and pro bono activities.

Additional Fees and Expenses

In addition to the advisory fees paid to FourStar, clients may also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks, and other financial institutions (collectively “Financial Institutions”). These additional charges may include securities brokerage commissions, transaction fees, custodial fees, fees attributable to alternative assets, reporting charges, fees charged by the Independent Managers, charges imposed directly by a mutual fund or ETF in a client’s account, as disclosed in the fund’s prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Additionally, for certain held- away assets outside the Firm’s management, FourStar may elect to charge a management fee based upon a graduated scale or a flat fee program or a combination of the two, based on providing certain administrative and consolidated reporting functions as accommodation to clients. The Firm’s brokerage practices are described at length in Item 12, below.

Direct Fee Debit

Clients generally provide FourStar and/or certain Independent Managers with the authority to directly debit their accounts for payment of the investment advisory fees. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to FourStar.

Account Additions and Withdrawals

Clients may make additions to and withdrawals from their account at any time, subject to FourStar’s right to terminate an account. Additions may be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or declines to accept particular securities into a client’s account. Clients may withdraw account assets on notice to FourStar, subject to the usual and customary securities settlement procedures. However, Firm generally designs its portfolios as long-term investments, and the withdrawal of assets may impair the achievement of a client’s investment objectives. FourStar may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, short- term redemption fees, fees assessed at the mutual fund level (e.g., contingent deferred sales charges) and/ or tax ramifications.

Receipt of Written Disclosure Statements

Clients who have not received FourStar's written disclosure statements as required under the Advisers Act within 48 hours prior to entering into an advisory agreement have the right to terminate the advisory agreement within 5 business days without penalty.

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

FourStar does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client's assets).

Item 7. Types of Clients

FourStar offers services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and business entities.

Minimum Account Requirements

FourStar does not impose a stated minimum fee or minimum portfolio value for starting and maintaining an investment management relationship. Certain Independent Managers may, however, impose more restrictive account requirements and billing practices from the Firm. In these instances, FourStar may alter its corresponding account requirements and/or billing practices to accommodate those of the Independent Managers.

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

Methods of Analysis and Investment Strategies

FourStar utilizes a combination of fundamental and technical methods of analysis.

Fundamental analysis involves an evaluation of the fundamental financial condition and competitive position of a particular fund or issuer. For FourStar, this process typically involves an analysis of an issuer's management team, investment strategies, style drift, past performance, reputation, and financial strength in relation to the asset class concentrations and risk exposures of the Firm's model asset allocations. A substantial risk in relying upon fundamental analysis is that while the overall health and position of a company may be good, evolving market conditions may negatively impact the security.

Technical analysis involves the examination of past market data rather than specific issuer information in determining the recommendations made to clients. Technical analysis may involve the use of mathematical based indicators and charts, such as moving averages and price correlations, to identify market patterns and trends which may be based on investor sentiment rather than the fundamentals of the company. A substantial risk in relying upon technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that FourStar will be able to accurately predict such a reoccurrence.

Risk of Loss

Market Risks

Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The profitability of a significant portion of FourStar's recommendations and/or investment decisions may depend to a great extent upon correctly assessing the future course of price movements of stocks, bonds and other asset classes. There can be no assurance that FourStar will be able to predict those price movements accurately or capitalize on any such assumptions.

Mutual Funds and ETFs

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per-share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed based ETFs and potentially more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 20,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

Use of Independent Managers

As stated above, FourStar may select certain Independent Managers to manage a portion of its clients' assets. In these situations, FourStar continues to conduct ongoing due diligence of such managers, but such recommendations rely to a great extent on the Independent Managers' ability to successfully implement their investment strategies. In addition, FourStar generally may not have the ability to supervise the Independent Managers on a day-to-day basis.

Item 9. Disciplinary Information

FourStar has not been involved in any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of its management.

Item 10. Other Financial Industry Activities and Affiliations

Licensed Insurance Agents

A number of the Firm's Supervised Persons are licensed insurance agents and may offer certain insurance products on a fully disclosed commissionable basis. A conflict of interest exists to the extent that FourStar recommends the purchase of insurance products where its Supervised Persons may be entitled to insurance commissions or other additional compensation. The Firm has procedures in place whereby it seeks to ensure that all recommendations are made in its clients' best interest regardless of any such affiliations.

Craig and Peggy Martin, are also registered with another investment adviser, Family Wealth Consulting, through which they provide private fund management services. When Mr. and Mrs. Martin recommend clients of FourStar Wealth Advisors invest in those managed funds, neither Mr. or Mrs. Martin are permitted to charge a separate asset management fee for any assets placed in these funds at their recommendation. However, Mr. and Mrs. Martin still receive compensation from such investments in the form of fund management fees. As such a conflict of interest exists with respect to such activities, we mitigate this conflict through disclosure in this document, review of all recommendations to invest in the private funds managed through Family Wealth Consulting, and a general prohibition on the recommendation of such investments unless they are in the best interest of the client. **Of note, recommendations to invest in these funds by other investment adviser representatives of the firm will still be charged asset management fees, as neither the firm nor our other investment adviser representatives receive any compensation through management of the funds.**

James Watkins, Jr., another of our investment adviser representatives, is also registered with another investment adviser, Watkins Financial Limited. Mr. Watkins maintains this registration for the sole purpose of providing advisory services to his own family trust, and he does not provide services to customers of FourStar through this entity. As such, there is no conflict with regard to his advisory activities through that entity. As a matter of routine compliance, Mr. Watkins' trust account is reviewed in conjunction with routine review of all FourStar personnel investment accounts to help ensure that Mr. Watkins adheres to the firm's Code of Ethics.

Two additional investment adviser representatives, Mitchell and Amy Bloom, are also dually registered with another registered investment adviser, Bloom Financial, LLC. Customers of Bloom Financial, LLC are being transitioned to services through FourStar Wealth Advisors, LLC. However, as a result of this transitional period, there could be instances wherein customers receive some portion of their services through both entities. FourStar monitors all recommendations and fees assessed to our customers for advisory services, regardless of whether such services are provided through FourStar Wealth Advisors, LLC or Bloom Financial, LLC in order to ensure that the services provided are in the best interest of the customer and that fees are not assessed inappropriately, and to ensure that, to the extent applicable, all such services are provided within the requirements of our Code of Ethics.

Item 11. Code of Ethics

FourStar has adopted a code of ethics in compliance with applicable securities laws ("Code of Ethics") that sets forth the standards of conduct expected of its Supervised Persons. FourStar's Code of Ethics contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by the Firm or any of its Supervised Persons and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

The Code of Ethics also requires certain of FourStar's personnel to report their personal securities holdings and transactions and obtain pre-approval of certain investments (*e.g.*, initial public offerings, limited offerings). However, the Firm's Supervised Persons are permitted to buy or sell securities that it also recommends to clients if done in a fair and equitable manner that is consistent with the Firm's policies and procedures. This Code of Ethics has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by certain personnel to be completed without any appreciable impact on the markets of such securities. Therefore, under limited circumstances, exceptions may be made to the policies stated below.

When the Firm is engaging in or considering a transaction in any security on behalf of a client, no Supervised Person will access to this information may knowingly effect for themselves or for their immediate family (*i.e.*, spouse, minor children and adults living in the same household) a transaction in that security unless:

- the transaction has been completed.
- the transaction for the Supervised Person is completed as part of a batch trade with clients; or

- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

Clients and prospective clients may contact FourStar to request a copy of its Code of Ethics.

Item 12. Custody Practices

Recommendation of Custodians for Client Transactions

FourStar generally recommends that clients utilize the custody, brokerage and clearing services for investment management accounts.

Factors which FourStar considers in recommending custodians or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research, and service. Custodians may enable the Firm to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by custodians may be higher or lower than those charged by other Financial Institutions.

The commissions paid by FourStar's clients to custodians comply with the Firm's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction where FourStar determines that the commissions are reasonable in relation to the value of the brokerage and research services received. 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 Financial Institution's services, including among others, the value of research provided, execution capability, commission rates and responsiveness. FourStar seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker/dealers in return for investment research products and/or services which assist FourStar in its investment decision-making process. Such research generally will be used to service all the Firm's clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because FourStar does not have to produce or pay for the products or services.

FourStar periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions considering its duty to obtain best execution.

FourStar uses additional firms for custody of alternative investments.

Software and Support Provided by Financial Institutions

FourStar may receive from the main custodian, without cost, computer software and related systems support, which allow FourStar to better monitor client accounts maintained at custodians. FourStar may receive the software and related support without cost because the Firm renders investment management services to clients that maintain assets at custodians. The software and support are not provided in connection with securities transactions of clients (i.e., not “soft dollars”). The software and related systems support may benefit FourStar, but not its clients directly. In fulfilling its duties to its clients, FourStar endeavors at all times to put the interests of its clients first. Clients should be aware, however, that FourStar’s receipt of economic benefits from a broker/dealer creates a conflict of interest since these benefits may influence the Firm’s choice of broker/dealer over another that does not furnish similar software, systems support or services.

Specifically, FourStar may receive the following benefits from the custodians:

- Receipt of duplicate client confirmations and bundled duplicate statements;
 - Access to a trading desk that exclusively services its institutional traders;
 - Access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts;
 - Access to an electronic communication network for client order entry and account information;
- and

Brokerage for Client Referrals

FourStar does not consider, in selecting or recommending broker/dealers, whether the Firm receives client referrals from the Financial Institutions or other third parties.

Directed Brokerage

The client may direct FourStar in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution and the Firm will not seek better execution services or prices from other Financial Institutions or be able to “batch” client transactions for execution through other Financial Institutions with orders for other accounts managed by FourStar (as described above). As a result, the client may pay higher commissions or other transaction costs, greater spreads or may receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, FourStar may decline a client’s request to direct brokerage if, in the Firm’s sole discretion, such directed brokerage arrangements would result in additional operational difficulties or violate restrictions imposed by other broker-dealers (as further discussed below).

Trade Aggregation

Transactions for each client generally will be affected independently, unless FourStar decides to purchase or sell the same securities for several clients at approximately the same time. FourStar may (but is not obligated to) combine or “batch” such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Firm’s client’s differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among FourStar’s clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that the Firm determines to aggregate client orders for the purchase or sale of securities, including securities in which FourStar’s Supervised Persons may invest, the Firm generally does so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. FourStar does not receive any additional compensation or remuneration because of the aggregation.

If the Firm determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account’s assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, the Firm may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis. The commissions that an advisory representative earns in her or his capacity as a broker dealer creates an incentive to recommend that broker, which inherently is a conflict of interests, which we address by disclosing here to our clients.

Trade Error Policy

We disclose trade error policy because there is the potential for conflicts of interest. It is the Firm’s policy to minimize the occurrence of trade errors and should they occur, detect such trade errors, and take steps to resolve the error in the best interest of the Firm’s clients. FourStar will place any error trades, whether gains or losses into the firm’s error account at the custodian and be responsible for any result of those errors. It is the Chief Investment Officer's responsibility to minimize any errors in trade processing.

Item 13. Review of Accounts -Account Reviews

FourStar monitors client portfolios on a continuous and ongoing basis while regular account reviews are conducted on at least a semi-annual basis. Such reviews are conducted by one of the Firm's investment adviser representatives. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with FourStar and to keep the Firm informed of any changes thereto. The Firm contacts ongoing investment advisory clients at least annually to review its previous services and/or recommendations and semi-annually to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Account Statements and Reports

Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions where their assets are custodied. From time-to-time or as otherwise requested, clients may also receive written or electronic reports from FourStar and/or an outside service provider, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. Clients should compare the account statements they receive from their custodian with any documents or reports they receive from FourStar or an outside service provider.

Item 14. Client Referrals and Other Compensation

Client Referrals

The Firm does not currently provide compensation to any third-party solicitors for client referrals. In the event a client is introduced to FourStar by either an unaffiliated or an affiliated solicitor, the Firm may pay that solicitor a referral fee in accordance with applicable state securities laws. Unless otherwise disclosed, any such referral fee is paid solely from FourStar's investment management fee and does not result in any additional charge to the client. If the client is introduced to the Firm by an unaffiliated solicitor, the solicitor is required to provide the client with FourStar's written brochure(s) and a copy of a solicitor's disclosure statement containing the terms and conditions of the solicitation arrangement. Any affiliated solicitor of FourStar is required to disclose the nature of his or her relationship to prospective clients at the time of the solicitation and will provide all prospective clients with a copy of the Firm's written brochure(s) at the time of the solicitation.

Other Economic Benefits

In addition, FourStar is required to disclose any relationship or arrangement where it receives an economic benefit from a third party (non-client) for providing advisory services. This type of relationship poses a conflict of interest, and any such relationship is disclosed in response to Item 12, above.

Financial Partners Disclosure

The Firm works with many providers ("Fund Families") of open-ended mutual funds, exchange traded funds and other investment products, in creating portfolio models for client accounts. Some of these Fund Families may sponsor marketing or other client events for the Firm by paying a portion of the expenses for the events

("Sponsorships"). These Sponsorships could potentially create a conflict of interest because a firm may have an incentive to invest client assets in financial products provided by the Fund Families. However, Sponsorships from any of the Fund Families are not tied in any way to the Firm's decision-making process of investing client assets into the financial products provided by the Fund Families. The Firm addresses this potential conflict of interest by disclosing which Fund Families the Firm works with and by only making such investments in the best interest of its clients without consideration of any Sponsorships.

Recent Fund Families the Firm has worked with include: 7e Investments, APX Energy, ARB Investment Solutions, ARC Trust, Ares Management, ARI - Applied Real Intelligence, Ashford Securities, BAM, Barrow Shaver, Baseline Partners, LLC, BC Partners, Blackstone REIT, BONAVENTURE, Bourne Financial Group, Burlington Capital, CAIS, Cantor Fitzgerald, Cantor Silverstein, Capital Square, Carter Family Funds, Carter Funds, Carter MultiFamily Fund Mgt Co., Cedar St. Companies, Cerebras (Linqto), CIM Group, CION Investments, Cliffwater, CNL Securities, Concept Capital Markets, Croatan, Cygnus Capital, Deal Point Merrill, Dempsey Lord Smith, Donovan Ventures, e2jdj, Eagle Point Credit, Empire Group LLC, Entoro Capital, EpiBone, Exchange Right, Exchange Right Real Estate, Forum Group, Four Springs Capital Markets, FS Investments, GH FitLab Partnership, Gladstone Securities, Graham Capital Management (Mgd Assets), Gray Harbor Capital Trust, Great Oak Funding, Greenbacker Capital, Griffin Capital, Hamilton Lane, Hamilton Point Investments, Hartman Investment, Hines Securities, Humanetics, HLD Fund Inc., IGF Partners, LLC, IGRE, Imedgeboards, Inception Financial, INLAND - Securities, Inland Securities, Invest X, Iron Gate Global, ISelect, John Henry Oil Corporation, Jones Lang LaSalle, JP Morgan, JVM Securities, Kelly Park Capital, Keystone National Properties (KNPRE), Laganza Capital, Lateral Investment Management, Learning Experience (Southlake TX), Legendary Capital, Lighthouse Life Capital, Lighthouse Life Capital (LHL Strategies), Lowndes Square, Madison Capital Group, Manufactured Housing Properties, MDS Energy Development, Megatel Capital (MCI), Mewbourne, Militello Capital, Mill Green, Montego Minerals/Midland, Morgan Creek, Nelson Partners, NexPoint Securities, Orchard Securities, Origin Investments, Outstanding Foods, Parsonex Capital Partners, Patrick Capital Markets, Peachtree (StoneHill), Peachtree Hotel Group, Peak 7 Holdings, Peak Capital Solutions, Phoenix American Hospitality, Pinnacle Capital Group, Pinnacle Partners, Pravati Capital, Preferred Capital Securities, PREP Securities, Prospect Capital, Rastegar Property Group, Reagan Capital, RealSource Properties Inc, Red Oak Capital, Red Oak Capital Group, Resolute Capital Partners, Resource Royalty, Rising Star Distributions, Roers Companies, S2K Financial LLC, Sandlot Partners, SC Distributors (Strategic Capital), Sealy Investment Securities, Sebago Lake, Seedbrite, Sequence Financial Specialists, ShopOff Realty Investments, Skyway Capital Markets, Socotra Capital, Southwestern Asset Mgt, Sovereign Partners LLC, Stonecrest, Strategic Capital Distributors, Strategic Capital Distributors (SC), Time Equities, Tractus Corp, TradeBacked, Triland Properties, Trilogy Cos, Triton Pacific Securities, TrueLife, United Growth, Urban Catalyst Funds, US Energy Development Corp., Varsity Invest, VisionWise Capital, Inc., Walton Global, Waveland Resources LLC, Waypoint Real Estate Investments, West Loop Ventures, White River Private Capital, White River Private, Windlass, Wishbone, Y-refy, Goldman Sachs, Wisdom Tree, InvestX Turo, Mu Reva, Palmer Square - Guilford Capital, PredxBio, Relavo, SmartRX, Invesco, SPDR Funds, American Funds, DFA - Dimensional Fund Advisors, O Shares, iShares, Schwab, Raymond James, Proshares, Sprott, Profit Score, Pacer Funds, Vanguard, First Trust

Item 15. Custody

The Advisory Agreement and/or the separate agreement with any Financial Institution generally authorize FourStar and/or the Independent Managers to debit client accounts for payment of the Firm's fees and to directly remit that those funds to the Firm in accordance with applicable custody rules. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to FourStar.

In addition, as discussed in Item 13, FourStar may also send periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the Financial Institutions and compare them to those received from FourStar.

Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

Through two of our investment adviser representatives, we have access to pooled investment vehicles' funds and securities, and therefore we are deemed to have indirect custody over the assets of FourStar customers placed in such funds and securities. As required, those assets are subject to surprise examination by an independent accountant on annual basis.

Item 16. Investment Discretion

FourStar may be given the authority to exercise discretion on behalf of clients. FourStar is considered to exercise investment discretion over a client's account if it can effect and/or direct transactions in client accounts without first seeking their consent. FourStar is given this authority through a power-of-attorney included in the agreement between FourStar and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). FourStar takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold;
- When transactions are made; and
- The Independent Managers to be hired or fired.

Item 17. Voting Client Securities

Declination of Proxy Voting Authority

FourStar generally does not accept the authority to vote a client's securities (i.e., proxies) on their behalf. Clients receive proxies directly from the Financial Institutions where their assets are custodied and may contact the Firm at the contact information on the cover of this brochure with questions about any such issuer solicitations.

Item 18. Financial Information

FourStar is not required to disclose any financial information due to the following:

- The Firm does not require or solicit the prepayment of more than \$500 in fees six months or more in advance of services rendered.
- The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.