



**Form ADV Part 2A
Firm Brochure
March 20,
2024**

This Brochure provides information about the qualifications and business practices of Fort Advisors Inc. If you have any questions about the contents of this Brochure, please contact us at 512.433.6492. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Fort Advisors Inc. is a registered investment advisory firm. Registration of an investment advisory firm does not imply a particular level of skill or training.

Additional information about Fort Advisors Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

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ITEM 2 **Material Changes**

Material Changes since the Last Update

Since our last amendment filing on March 31, 2023, the following material changes were made to the brochure:

- We became registered with the U.S. Securities and Exchange Commission in July 2023.
- In September 2023, Charles Schwab & Co., Inc. completed its purchase of TD Ameritrade. Charles Schwab & Co., Inc. is now our recommended custodian.

Full Brochure and Additional Information

Full Brochure and additional information about Fort Advisors Inc. are available via the SEC's website, www.adviserinfo.sec.gov. The SEC's website also provides information about any persons affiliated with us who are registered or are required to be registered as investment adviser representatives ("IAR").

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Advisory Business

FIRM INFORMATION

Fort Advisors Inc. ("Fort Advisors," "we," "us," "our"), a corporation formed in September 2018, is a registered investment advisory firm located in Austin, Texas. We became registered with the U.S. Securities and Exchange Commission in July 2023.

PRINCIPAL OWNERS

Fort Advisors is owned and controlled by its President, Justin Lee Fort, who also serves as the Chief Compliance Officer.

INVESTMENT ADVISORY SERVICES

Asset Management Services:

We provide asset management services on a discretionary and non-discretionary basis in which investment advisers manage your accounts. Our services provide additional investment opportunities among stocks, bonds, mutual funds, exchange-traded funds (ETFs), Real Estate Investment Trusts (REITs), options, and additional securities. Our asset management services involve providing you with the continuous and ongoing supervision of your custodial accounts. Where appropriate, Fort Advisors also provides advice about legacy positions and/or other investments held in client portfolios which may be held away from the client's primary custodian.

Financial Planning and Consulting Services:

We provide financial planning services that find ways to help you understand your overall financial situation and help you set financial objectives. We accomplish this by helping you review your financial goals, tax planning strategies, asset allocation, risk management, retirement planning, and other areas and objectives and then providing you with a written plan which will typically include general recommendations for a course of action or specific actions. Implementation of the recommendations will be at your discretion.

Third-Party Money Management Services:

We may recommend third-party money managers ("TPMMs") to manage part or the client's entire portfolio. TPMMs may be recommended when the TPMMs' philosophy, investment strategy, and style meets the client's financial situation, investment objectives, and risk tolerance. The asset management services provided by the TPMMs, the compensation to be paid, and other terms of the relationship between the client and the TPMMs will be described in the TPMMs' disclosure documents and its managed account agreement. We will pay a portion of the investment advisory fee paid by the client to the TPMMs.

Private Investment Due Diligence

Fort Advisors will recommend selected private investment funds for certain high net worth clients and for whom such investments are suitable and appropriate. Our role will be limited to initial and ongoing due diligence and investment monitoring services. If a client chooses to become a private fund investor, the client will enter into a separate subscription agreement with the relevant private investment fund(s) and will incur separate fees that vary based upon the specifics of the fund(s). Assets invested in the private fund(s) are included in the calculation of Fort Advisors' investment advisory fees. We do not receive any commissions or other forms of remuneration for recommending any investment with a private investment fund. Private funds are recommended only to clients that meet certain investor sophistication standards that are defined in the federal securities laws and

regulations and within the issuer's offering documents. Each fund manager will have a sophistication standard that a client must meet to invest in a fund.

CLIENT INVESTMENT OBJECTIVES/RESTRICTIONS

Fort Advisors offers the same suite of services to all our clients. However, specific client financial plans and their implementation are dependent upon the individual client's Investment Policy Statement, which outlines a client's current financial situation such as income, net worth, and risk tolerance levels. This information is essential in the development of a client-specific plan in the selection of investments that matches restrictions, needs, and targets. On a case-by-case basis, our clients may impose restrictions on investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent us from properly servicing the client's account, or if the restrictions would require us to deviate from our standard suite of services, we reserve the right to end the relationship. We may request additional information and documentation such as current investments, tax returns, insurance policies, and estate plan. We will discuss your investment objectives, needs, and goals, but you must inform us of any changes. Unless directed by you, we do not independently verify any information provided to us by you or your attorney, accountant, or other professionals.

WRAP FEE PROGRAMS

Fort Advisors does not participate in, recommend, or offer wrap fee programs.

ASSETS UNDER MANAGEMENT

As of December 31, 2023, Fort Advisors managed \$111,399,767 on a discretionary basis only.

ITEM 5 Fees and Compensation

ANNUAL FEES FOR ADVISORY SERVICES

Fort Advisors is compensated for providing asset management services by charging an asset management fee. The asset management fee is based on the total assets under management calculated using the average daily balance of the client's account(s).

The fees charged for financial planning services are negotiable and vary depending on the complexity of the process undertaken, the types of issues addressed, the scope of services provided, and the frequency with which the services are rendered. All fees are agreed upon before entering into the Financial Planning and Consulting Agreement you sign.

The below ranges are the standard fee ranges that are typically charged. We may waive the agreed-upon financial planning fees if you engage our asset management services.

Asset Management Fee Schedule

All Assets	0 - 2.50%
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Financial Planning and Consulting Fee Schedule

Hourly	Up to \$500 per hour
Fixed Fee	\$500 - \$20,000

FEE BILLING & PAYMENT

Asset management fees may either be invoiced and billed directly to you or directly deducted from your account. Payments are due by the end of the month. The fee billing will be pre-determined in writing in the investment advisory agreement that is executed by you and Fort Advisors. We will deduct our asset management fee only when in receipt of your written authorization by executing an investment advisory agreement permitting the fees to be paid directly from your account. We will send a copy of your invoice to the custodian. The qualified custodian will deliver an account statement to you at least quarterly, which will show all disbursements from your account. We urge you to review all statements for accuracy.

Financial planning and consulting fees may be assessed on an hourly basis or as a one-time project fee. An estimate for total hours will be determined at the start of the relationship in order to determine whether hourly planning or a project-based plan is in the Client's best interest. The Client will pay half of the fee upon signing the agreement and the remaining upon delivery of the plan. In no case will Fort Advisors require a fee of \$500 or more to be paid 6 months or more in advance. Financial planning and consulting fees are paid via check or payment processing service.

In TPMM accounts, Fort Advisors is responsible for calculating and deducting the advisory fee from the client's account and then will forward a portion of the advisory fee to TPMM. We urge our clients to refer to the selected TPMM's disclosure documents for exact fees and expenses charged by each such TPMM, as well as minimum account requirements, refund, and termination provisions. A complete description of each program can be found in disclosure materials prepared by the TPMM, which we will provide to the client at the time we recommend the program.

Clients receiving our private investment due diligence services will be charged a fee ranging from 0.50% to 1.00% of the total assets Fort Advisors recommends that the client invest and be payable in advance via check or payment processing service. These fees are separate from our asset management fee and the private investment fund's fees. Fees assessed for the private investments will be outlined in the investment's private placement memorandum.

You are responsible for all third-party fees (i.e., custodian fees, mutual fund fees, transaction fees, etc.). These fees are separate and distinct from the fees and expenses charged by Fort Advisors.

Our receipt of an asset-based fee presents a conflict of interest. This is because the more assets there are in the client's account, the more the client will pay in fees. Therefore, we have an incentive to encourage clients to increase the assets in their accounts. We address this conflict of interest by ensuring any such recommendations are in the client's best interest.

TERMINATION OF AGREEMENT

Either party may terminate the investment advisory agreement by providing 30-day advance written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable up to and including the effective date of termination.

Notwithstanding the above, if we do not deliver the appropriate disclosure statement to you at least 48 hours prior to you entering into any written or oral advisory contract with us, then you have the right to terminate the contract without penalty within five (5) business days after entering into the contract.

OTHER EXPENSES AND FEES

The fees discussed above include payment solely for our asset management and financial planning services provided by us and are separate to certain fees or charges that are imposed by third parties

in connection with investments made on your behalf for your account. Third-party fees may include markdowns, markups, brokerage commissions, other transaction costs, and/or custodial fees.

Also, all fees paid to us for asset management services are separate from the expenses charged by exchange-traded funds and mutual funds to their shareholders. These fees and expenses will be used to pay management fees for the funds, other fund expenses, account administration, and a possible distribution fee. Exchanged traded funds and mutual funds can be invested in directly by you without our services. However, you would not receive our services to assist you in determining which products or services are most suitable for your financial situation and objectives. You should review both the fees we charge and the fees charged by the fund(s) to understand the total fees to be paid fully.

OTHER COMPENSATION AND POTENTIAL CONFLICTS OF INTEREST

Please note that the Firm's investment adviser representatives ("IARs") may be licensed to sell insurance products. In such cases, the Firm's IARs may earn a typical and customary commission for the sale of insurance products. This represents a conflict of interest in that Our IARs have an incentive to recommend insurance products that may pay them a commission. Insurance products offered by our IARs may be available through other channels, and as a client, you are not obligated to purchase insurance products recommended by our IARs.

Retirement Plan Rollovers And Transfers – A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) rollover to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could depending upon the client's age, result in adverse tax consequences). If we are asked by a client or potential client to make a recommendation from among these choices, we have a conflict of interest in that we have an incentive to recommend that a client rollover their retirement plan assets into an account to be managed by the Firm. Such a recommendation creates a conflict of interest as we will earn Advisory Fee(s) and or commission(s) from insurance product sale(s). We address this conflict of interest by reviewing any such recommendation to ensure it is in the best interest of the client. No client is under any obligation to rollover or transfer retirement plan assets to an account managed by us or to an insurance company we recommend.

ITEM 6 Performance-Based Fees

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

ITEM 7 Types of Clients Description

We provide our investment advisory services to:

- Individuals
- High Net Worth Individuals

We do not have a minimum account size for our asset management services.

Methods of Analysis, Investment Strategies, and Risk of Loss

METHODS OF ANALYSIS

We use various methods of analysis and investment strategies, including the following:

Fundamental Analysis – We evaluate economic and financial factors to determine if a security may be underpriced, overpriced, or fairly priced. This method entails assessing a security by attempting to determine its intrinsic value by examining related financial, economic, and other qualitative and quantitative factors. Fundamental analysis requires an in-depth look at all factors that can affect the security's value, from macroeconomic factors (like the overall economy and industry conditions) to individually specific factors (like the financial situation and management of companies). The overall objective of performing the fundamental analysis is to determine a value that an investor can use to determine what sort of position to take with that security. This method of security analysis is contrary to technical analysis. Fundamental analysis involves using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

Technical Analysis – This method involves the evaluation of securities by performing an analysis of static information that is generated by market activity, such as past prices and volume. Technical analysis does not attempt to measure a security's intrinsic value but instead uses charts and other tools to determine the patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

Charting - This is a type of technical analysis where we review various charts of market and security activity in an attempt to identify when the market is moving up or down and predicting how long trends may last and when that trends might reverse.

Modern Portfolio Theory - Modern portfolio theory (MPT) is a risk-averse theory that involves the construction of portfolios to maximize and optimize expected return based on a given level of market risk, emphasizing that risk is an inherent part of higher reward. According to the theory, it's possible to construct an "efficient frontier" of optimal portfolios offering the maximum possible expected return for a given level of risk.

Cyclical Analysis: Cyclical analysis is the statistical analysis of specific events occurring at a sufficient number of relatively predictable intervals that they can be forecasted into the future. Cyclical analysis asserts that cyclical forces drive price movements in the financial markets. Risks include that cycles may invert or disappear, and there is no expectation that this type of analysis will pinpoint turning points, instead be used in conjunction with other methods of analysis.

Quantitative Analysis – Quantitative analysis is the use of mathematical models or algorithms to model risks or to evaluate assets in an attempt to obtain a more accurate measurement of a company's data (i.e., share price, earnings per share, etc.). Risks include using inaccurate or out-of-date data or utilizing models that include inaccurate assumptions or formulas.

INVESTMENT STRATEGIES

When formulating investment advice or managing client assets, we will use the following investment strategies. There are inherent risks associated with each of these strategies.

Long Term Trading - A long-term strategy may not take advantage of short-term gains or may experience more volatility over the life of the portfolio.

Short Term Trading - a short-term strategy may incur more trading and brokerage costs and runs the risk that certain anticipated market movements do not occur, resulting in the client holding security for longer than intended.

Short Sales - This strategy usually, but not always, involves the sale of securities that are not owned by the seller in anticipation of profiting from a decline in the price of the securities. The risk is that the underlying security may go up in value and cannot be bought at a price lower than for which it was sold, thus resulting in a loss to the Client.

Margin Transactions - This strategy involves using one's current holdings as collateral to buy additional securities. Clients must complete specific paperwork to allow for such trading to occur in their account(s). The major risks involving the use of margin transactions include market and interest rate risks.

Option Writing - Writing an option refers to the act of selling an option. An option is the right, but not obligation, to buy or sell a particular trading instrument at a specified price, on or before its expiration. When someone writes an option, they must deliver to the buyer a specified number of shares if the option is exercised. The writer has an obligation to perform a duty while the buyer has the option to take action. In the case of writing covered options, the writer owns the security in advance of having to deliver should the buyer exercise the option. In the case of writing an uncovered option, the seller does not own the security and would be subject to additional market risk should the option be executed. Spread strategies involve multiple options trading. Clients must complete additional documents in order to qualify for options trading. Market risk is the primary risk associated with trading options.

Your accounts are managed separately with your underlying investment strategies, restrictions, or investment limitations defined within the investment advisory agreement.

POTENTIAL RISKS

Investing involves different levels of risk that can result in the loss of any profits and/or principal you have not realized. We manage your account in a manner consistent with your pre-determined risk tolerance and suitability profile. However, we cannot guarantee that our efforts will be successful. Investing in securities involves the risk of loss clients should be prepared to bear.

Investing involves the assumption of risk, including:

Financial Risk: which is the risk that the companies we recommend to you perform poorly, which affect the price of your investment.

Market Risk: which is the risk that the stock market will decline, decreasing the value of the securities we recommend to you with it.

Inflation Risk: which is the risk that the rate of price increases in the economy deteriorates the returns associated with the stock.

Liquidity Risk: which is the risk that certain assets may not be readily converted into cash or may have a very limited market in which they trade.

Political and Governmental Risk: which is the risk that the value of your investment will be affected by the introduction of new laws or regulations.

Interest Rate Risk: which is the risk that the value of the investments we recommend to you will fall if interest rates rise.

Call Risk: which is the risk that your investment will be called or purchased back from you when conditions are favorable to the bond issuer and unfavorable to you.

Default Risk: which is the risk that the issuer is unable to pay the contractual interest or principal on the investment promptly or at all.

Manager Risk: which is the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.

Industry Risk: which is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.

Alternative Investments: Private placements, hedge funds, private equity, Real Estate Investment Trusts ("REITs"), Business Development Companies ("BDCs"), and other alternative investments involve a high degree of risk and can be illiquid due to restrictions on transfer and lack of a secondary trading market. They can be highly leveraged, speculative, and volatile, and an investor could lose all or a substantial amount of investment. Alternative investments may lack transparency as to share price, valuation, and portfolio holdings. Complex tax structures often result in delayed tax reporting. Compared to mutual funds, hedge funds and commodity pools are subject to less regulation and often charge higher fees. Alternative investment managers typically exercise broad investment discretion and may apply similar strategies across multiple investment vehicles, resulting in less diversification.

In addition, there is no assurance that a mutual fund, an ETF, or any security will achieve its investment objective. The principal risks of investing in any mutual fund or ETF are market risk, diversification risk, and style risk (growth investing risk and mid-cap company risk). To the extent that a mutual fund or ETF invests in foreign securities or debt securities, a fund would be subject to foreign exposure risk, interest rate risk, and credit risk. A fund may invest in derivative instruments that carry derivative instruments risk. A principal risk is a risk that the value of equity securities may decline. Although a mutual fund or ETF may be a diversified fund, it may invest in securities of a limited number of issuers to achieve a potentially greater investment return than a fund that invests in a larger number of issuers. As a result, price movements of a single issuer's securities will have a greater impact on this fund's net asset value, causing it to fluctuate more than that of a more widely diversified fund. These and other risk considerations are discussed in a fund's prospectus. Past performance of investments is no guarantee of future results.

Mutual fund investing involves risk, including the possible loss of principal. Non-diversified funds are more susceptible to financial, market, and economic events affecting the particular issuers and industry sectors in which they invest and, therefore, may be more volatile or risky than less concentrated investments. There can be no assurance that any fund will be able to achieve its investment objective. For more information on a particular fund's associated risks, please refer to that fund's prospectus or equivalent disclosure document.

Due to the volatile nature and risks involved when investing in certain types of strategies and/or securities, clients should be aware that the actual return and value of their account(s) may fluctuate and at any point in time be worth more or less than the amount originally invested. Fort Advisors does not represent, guarantee, or imply that the services or methods of analysis employed by Us can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines.

ITEM 9 Disciplinary Information

As of the date of this brochure, we have not been subject to any disciplinary, legal, or regulatory events related to past or present investment clients. There has been no disciplinary, legal, or regulatory events related to us or any of our management persons.

ITEM 10 Other Financial Activities and Affiliations

FINANCIAL INDUSTRY ACTIVITIES

Neither Fort Advisors nor its management persons are registered or has an application pending to register as a broker-dealer or a registered representative of a broker-dealer.

Neither Fort Advisors nor its management persons are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or commodity trading advisor.

AFFILIATIONS

Justin Lee Fort owns Amicord LLC and is an independent insurance agent licensed to sell insurance products. A conflict of interest exists in that these services pay a commission which conflicts with the IAR's fiduciary duties. Fort Advisors does not require its IARs to encourage clients to implement investment advice through their insurance product recommendations. Clients have the right to implement insurance product recommendations through the insurance agency and agent of their choice. We require that all IARs disclose this conflict of interest when such recommendations are made. We also require IARs to disclose that the client has the right to purchase recommended products from individuals not affiliated with us.

SELECTION OF THIRD-PARTY MONEY MANAGERS (TPMM)

We may recommend or select TPMM(s) for our client(s) and their respective account(s). We may share a portion of our advisory fee with the TPMM(s) for money management services provided by TPMM(s). Fort Advisors will always act in the best interest of our clients when making recommendations or selecting TPMM(s). Client(s) always have the right to decide whether or not to utilize the services of any recommended TPMM(s). All TPMM(s) must be properly licensed and registered as required by law. The fees shared will not exceed any limit(s) imposed by regulatory requirements.

We can only recommend TPMM(s) that we have a relationship with and have met the conditions of our due diligence process. Other TPMM(s) may exist that may be more or less competitive than our recommended TPMM(s).

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

CODE OF ETHICS

Fort Advisors has developed a code of ethics that will apply to all of our supervised persons. We and our IARs must act in a fiduciary capacity when providing investment advisory services to you. 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. Fort Advisors has a

fiduciary duty to all clients. This fiduciary duty is considered the core underlying principle of our code of ethics, which also covers our insider trading, and personal securities transactions policies and procedures. We require 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 acknowledge that they have read, understand, and agree to comply with our Code of Ethics.

Our Code of Ethics is available to clients and prospective clients upon request.

RECOMMENDATIONS INVOLVING A MATERIAL FINANCIAL INTEREST

Neither we nor any related person recommend to clients or buys or sells for clients' accounts securities in which we or a related person has a material financial interest.

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

There may be instances where an IAR will recommend to investment advisory clients or prospective clients the purchase or sale of securities in which an IAR, its affiliates, or other clients may also have a position or interest. Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis. Generally, in such circumstances, the affiliated and client accounts will share execution costs equally. Completed trade orders will be allocated according to the instructions from the initial trade order. Partially filled trade orders will be allocated on a pro-rata basis. Any exceptions will be explained in the trade order.

PERSONAL TRADING

Employees are permitted to have personal securities accounts as long as personal investing practices are in line with fiduciary standards and regulatory requirements and do not conflict with their duty to Fort Advisors and our clients. Fort Advisors monitors and controls personal trading through pre-approval of all personal securities transactions or blackout periods imposed upon employees trading in the same securities as Fort Advisors. We forbid any officer or employee, either personally or on behalf of others, to trade on material, nonpublic information, or to communicate such information to others in violation of the law.

ITEM 12 Brokerage Practices

We recommend broker/dealers for our clients to use in order to custody their accounts. The firms we recommend will be independent SEC-registered broker-dealers and members of FINRA and SIPC. We currently recommend Charles Schwab & Co., Inc.

As a fiduciary, we are obligated to seek out the best execution of client transactions for the accounts that we manage. In general, the execution of securities transactions is at a total cost or proceeds in each transaction and are the most favorable under the circumstances. However, we do not limit the best execution to the lowest available price. Additional factors are taken into consideration when determining the arrangement and services in the selection of a broker-dealer or qualified custodian. Our review consists of reviewing the commission and fee structures of various broker/dealers, research platforms, and execution services. Accordingly, while we do consider competitive rates, we do not necessarily obtain the lowest possible commission rates for account transactions. Therefore, the overall services provided by the unaffiliated broker-dealers and qualified custodians are evaluated to determine the best execution.

RESEARCH AND OTHER SOFT DOLLAR BENEFITS

We may receive soft dollar benefits in that certain custodians may make available to us other products and services such as trade execution software, investment research, pricing information, market data, recordkeeping, publications, and conferences. These types of services will be consistent with the safe harbor requirements in Section 28(e) of the Securities and Exchange Act of 1934. Acceptance of such services may result in higher commissions paid by the client.

BROKERAGE FOR CLIENT REFERRALS

We do not receive client referrals from broker/dealers.

DIRECTED BROKERAGE

Clients will be permitted to select any broker/dealer of their choosing. In these situations, we may be unable to achieve the most favorable execution for client transactions. Directing brokerage may cost clients more money in that the client may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or the client may receive less favorable prices.

TRADE AGGREGATION

We attempt to allocate trade executions in the most equitable manner possible, taking into consideration current asset allocation and availability of funds using price averaging, proration, and consistently non-arbitrary methods of allocation. We may aggregate orders in order to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among our clients' differences in prices and commission or other transaction costs. In aggregated orders, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

ITEM 13 **Review of Accounts**

PERIODIC REVIEWS

The Chief Compliance Officer will review asset management accounts no less than quarterly. Accounts are reviewed to evaluate asset allocation, investment strategy and objectives, cash balance, and performance, as well as the general economic outlook and current investment trends.

The Chief Compliance Officer will review financial plans and the financial planning process. Clients will not receive additional reviews or reports once the plan is delivered.

REVIEW TRIGGERS

We conduct periodic reviews to evaluate the current market, economic and political events and how these may affect client accounts. Additional reviews may be triggered by these events or by events in the client's financial or personal status.

REGULAR REPORTS

Asset management clients will receive advisory account reports no less than quarterly. These reports show asset value by cash balances, security, unit cost, total cost, current per share values, etc. Clients are urged to review the quarterly reports provided by us with those provided by their custodian and notify us of any differences. Clients are encouraged to phone or email us as often as they deem necessary to receive information regarding the investment tactics and strategies being followed.

Financial planning and consulting clients are provided a one-time written financial plan concerning their financial situation. Clients will not receive additional reviews or reports once the plan is delivered.

ITEM 14 Client Referrals and Other Compensation

We will receive compensation from TPMM's when they are engaged. Any such compensation arrangement will be formalized in an agreement and disclosed to our clients.

Please see Item 12 Brokerage Practices for information regarding benefits we receive from our custodian.

From time to time, we may engage in referral relationships and pay a referral fee to third-party solicitors. However, no fee is paid unless we have a signed and executed solicitor agreement. You must sign a disclosure form that contains the details of the referral agreement. Our fiduciary duties still apply to referral relationships, and we must put the interest of our clients first and see the best execution of securities transactions on behalf of our clients.

ITEM 15 Custody

We are deemed to have custody of client funds and securities due to our ability to deduct management fees from clients' accounts. We will not take physical custody of clients' funds and will not assign or transfer trading authorization to another advisor. Clients will receive account statements from the qualified custodian(s) holding their funds and securities at least quarterly. The custodian's account statements will indicate the amount of our advisory fees deducted from the clients' account(s) each billing period. These statements should be carefully reviewed by the client for accuracy. Item 5 – Fees and Compensation has additional information regarding our ability to deduct management fees from clients' accounts.

ITEM 16 Investment Discretion

DISCRETIONARY AUTHORITY FOR TRADING

If you are participating in our asset management services, upon receiving your written authorization via our executed investment advisory agreement, we will maintain trading authorization over your designated account and may also implement trades on a discretionary basis.

When discretionary authority is granted, we will have the limited authority to determine the type of securities to be purchased, sold, or exchanged and a number of securities that can be bought, sold, or exchanged for your portfolio without obtaining your consent for each transaction.

If you do not grant this limited investment discretion, your IAR will be required to contact you and get affirmation regarding our investment recommendations, such as the security being recommended, the number of shares, whether the security should be bought or sold before implementing changes in your account.

Once the above factors are agreed upon, we will be responsible for making decisions regarding the timing of buying or selling an investment and the price at which the investment is bought or sold. If your accounts are managed on a non-discretionary basis, it is critical that you respond promptly. If we do not receive a response to our request immediately, the timing of trade implementation may lead to an adverse impact where we may not achieve the optimal trading price.

On a case-by-case basis, you may place reasonable restrictions on the types of investments that may be purchased or sold in your account so long as the restrictions are explicitly set forth or included as an attachment to the investment advisory agreement.

ITEM 17 **Voting Client Securities**

We do not have the authority to vote proxies as it pertains to the issuers of securities held in your account. The responsibility for voting your securities places increased liability to us and does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting your securities.

Therefore, you are responsible for voting all proxies for securities held in accounts managed by us. Typically, our qualified custodian will forward you your proxy information. Although we do not vote your proxies, you can contact us if you have a question about a particular proxy.

ITEM 18 **Financial Information**

We do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, therefore we are not required to include a balance sheet for our most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

We are currently not in, nor have been historically in a financially precarious situation or the subject of a bankruptcy petition.