

NWAM, LLC dba

RIA INNOVATIONS

Choice Solutions Wrap Fee Program Brochure Form ADV: Part 2 Appendix 1

This wrap fee program brochure provides information about the qualifications and business practices of NWAM, LLC dba RIA Innovations ("RIA Innovations"), an SEC registered investment advisory firm. Being registered is neither an endorsement nor an indication of expertise. If you have any questions about the contents of this brochure, please contact us at (206) 838-3680. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any states securities authority.

Additional information about NWAM, LLC dba RIA Innovations also is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 1 – COVER PAGE

March 30, 2018

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ITEM 2 – MATERIAL CHANGES

The following material changes as of March 30, 2018 are listed below:

No Changes.

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ITEM 4 – SERVICES, FEES AND COMPENSATION

4a: Services and Fees

NWAM, LLC dba RIA Innovations and Northwest Asset Management is an SEC registered investment adviser. NWAM, LLC was established in July 2008 by managing member Gregory Allen Headrick, CFP®, Chief Compliance Officer. The firm's Chief Operations Officer is Nelly Mubashi, CRPS®. The main office is located at 2835 82nd Avenue SE, Suite 300, Mercer Island, Washington 98040.

RIA Innovations was established to provide back office services to registered investment advisory firms and other affiliated businesses including:

- Front Office support
- Back Office support
- Technology
- Compliance
- Non-Discretionary Asset Management
- Succession Planning

RIA Innovations participates in the NWAM, LLC's Choice Solutions Wrap Fee Program ("Program"). This program is made available to select Registered Investment Advisory firms and may include RIA Innovation's sub-advisory, portfolio management services. This brochure describes the Choice solutions Wrap Fee Program. A wrap fee program allows clients to pay a specified fee for investment advisory services and the execution of transactions. The fee is not based directly upon transactions in their account.

The Program is offered only through accounts held at one of our partner custodians as mutually agreed upon by your Advisory firm (Advisor) or your individual investment advisor representative and yourself. You work with your advisor representative on the investment strategies used to manage your account, including current financial situation, financial goals and attitudes toward risk, which will allow your advisor representative to advise appropriate asset allocations and/or advice concerning selection of other Advisors.

The Program consists of discretionary managed accounts that utilize portfolios designed to meet the wide variety of goals, risk exposure and time horizons. Our portfolios span the range of client needs, ranging from conservative to aggressive growth.

RIA Innovations receives compensation paid from the overall advisory service fees paid to your Advisor. The overall fee is set forth in your agreement with your Advisor and is discussed in their ADV Part 2 Firm Brochure which you should also receive. These charges include the cost of executing securities transactions. There is no separate charge for brokerage commissions; however, clients normally will be charged any mark-ups or mark-downs with respect to fixed income securities and certain other securities. The fees charged for the Program are paid out of your overall advisory fees charged by your Advisor to us for sub-advisory, wrap and portfolio management services provided by RIA Innovations. Fees to outside portfolio managers may be charged in addition to Program fees. The specific fees and other terms and conditions under which a client engages an outside portfolio manager will be set forth in a separate written agreement with the designated outside portfolio manager.

Fees are paid quarterly in advance or arrears, as specified in the client contract between yourself and your Advisor. In cases where we are paid in advance, when an agreement is terminated, at the request of your Advisor, we will refund any pre-paid, unearned fees based on the number of days remaining in the quarter after termination. Refunds will be made in the month following the end of the quarter in which the contract was terminated.

When an agreement is terminated, all assets may need to be transferred from the current custodian. You will be responsible for paying all fees including full quarterly custodial administrative fees, account closure fees, mutual fund fees and all trading costs due to the termination. Custodian may assess additional fees for transfer of illiquid investments. If there is insufficient cash in the account, the liquidation of some securities may be used to pay the fees. Prior to termination of an agreement, your RIA can provide a good faith estimate of costs.

Other Investment Compensation

RIA Innovations may receive other compensation from your Advisor for other back office services provided.

4b: Relative Cost of Services

A wrap fee programs allows clients to pay a specified fixed fee for the execution of transactions. Your fee is bundled with costs for executing transactions in your account(s). By participating in a wrap fee program, you may end up paying more or less than you would through a non-wrap fee program where a lower total advisory fee is charged, but trade execution costs are passed directly through to you by the executing broker.

4c: Additional Fees

The program's fee does not include: (i) fees charged by outside portfolio managers (ii) annual account fees or other administrative fees, such as wire fees, charged by custodians; (iii) underwriting or dealer concessions or related compensation in connection with securities acquired in underwritten offerings; (iv) certain odd-lot differentials, transfer taxes, transaction fees mandated by the Securities Act of 1934, postage and handling fees, and charges imposed by law with regard to transaction in the client's account; and (v) advisory fees and expenses of mutual funds (including money market funds), ETFs, closed-end investment companies or other managed investments, if any are held in client's accounts.

The quarterly fee does not cover certain cost associated with securities transactions in the over-the-counter market where we must approach a dealer or market maker to purchase or sell the security. Such cost includes a mark-up, mark-down or spread and odd lot differentials or transfer taxes imposed by law. Because the Program will be paying to the Custodian the transaction and execution costs of securities transactions a potential conflict of interest may arise creating a disincentive for us to trade securities in client accounts.

4d: Referrals and Compensation

The client has a direct agreement with their Advisor as to the total fees paid for advisory services. Those fees could be more or less as a result of the Advisor's participation in the Program. The amount of compensation the client's Advisor receives may be more or less than what the Advisor would receive if the client participated in another wrap fee program, or if the client paid separately for investment advice, brokerage and other services.

ITEM 5 – ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

The Program caters primarily to individuals, including high net worth individuals and their retirement accounts, family offices and family investment vehicles who seek an approach to capital appreciation by investing in established stocks, exchange traded funds, mutual funds and fixed income. It is also suitable for institutional investors such as pension and profit sharing plans, trust, estates and/or charitable organizations and corporations. There is no account size minimum.

ITEM 6 – PORTFOLIO MANAGER SELECTION AND EVALUATION

6a: Selection of Managers

Your Advisor may use its in-house professional to act as portfolio manager. Your Advisor may utilize RIA Innovations in-house professionals to act as portfolio managers.

You may also engage an outside portfolio manager, the specific terms and conditions of which may be set forth in a separate written agreement with the designated outside portfolio manager. In addition to this brochure, clients may

also receive the written disclosure documents of the respective outside portfolio manager engaged to manage their assets.

RIA Innovations does not select or review outside portfolio managers for Advisors. Review with your Advisor the selection and evaluation process. You should be aware that our firm cannot actively monitor outside portfolio managers conflicts of interest, daily trading activity and other operational issues.

Since our firm and its in-house professionals also act as portfolio managers, this may create a conflict of interest in that other investment advisory firms may charge the same or lower fees than our firm for similar services.

6b: Related Persons

Where we provide our own portfolio managers, we do use related persons to act as portfolio managers.

6c: Additional Information

Types of Advisory Services

NWAM, LLC dba RIA Innovations and Northwest Asset Management offers a wide range of advisory, portfolio and consulting services. This brochure is specific to the services we provide to select Advisors that participate on the RIA Innovations platform.

Client Tailored Relationships and Restrictions

As a fiduciary, we always act in the client's best interests. Where RIA Innovations acts as portfolio manager, each client's portfolio is customized based on the client's investment objectives. You should speak to your advisor representative regarding requests or suggestions on the investments made in your portfolio. Restrictions on trading that, in either the Advisors' or Programs expert opinion, are not in your best interest cannot be honored.

Performance Based Fees and Side-by-Side Management

RIA Innovations does not charge advisory fees on the performance of funds or securities in your account.

Methods of Analysis, Investment Strategies and Risk of Loss

Strategies and Analysis

Where RIA Innovations acts as portfolio manager for the Program, RIA Innovations uses multiple strategies in order to best meet the diverse needs of clients. We use multiple sources of information in performing our research, including sources such as reports and articles in financial media, financial magazines, research prepared by others, industry publications, corporate rating services, prospectuses, company press releases and annual reports and filings with the SEC. We generally use fundamental analysis to evaluate securities and market conditions. Fundamental analysis does not attempt to anticipate market movements. Using this method of analysis presents a potential risk as prices of securities can move up or down due to company-specific circumstances as well as in line with the overall market regardless of the economic factors considered in evaluation.

We believe it is important that each client know that our strategy is tailored to best meet their goals and needs. Each client presents a unique profile, and we may employ one or more strategies or methods to meet their goals.

Modern Portfolio Theory

We generally adhere to the principles of Modern Portfolio Theory, which advocates investing across different asset classes to increase diversity and reduce risk. Based on our research and the research of others, we can build portfolios that collect assets among similar risk and growth profiles, like cash equivalents (money market funds); high-quality, short-term bonds; large and small company stocks; and growth (higher-priced) and value (lower-priced) stocks in the U.S. and foreign developed markets. In certain circumstances, large, small, growth, and value stocks in select emerging markets and/or shares of real estate investment trusts (REITs) and commodity indexes will be included in diversified portfolios.

Asset Allocations

Working with your advisor representative, they will recommend a general strategy that will allocate your assets into different portfolios. This mix of portfolios is based on an assessment of your long-term financial objectives, risk exposure and current financial needs and plans. Your advisor representative will also review your account on a regular basis and may rebalance your assets as financial markets rise and fall and the specific assets of different parts of your portfolio change. Additionally, we will review and rebalance your account as needed, but no less than annually. This creates the opportunity to selectively rebalance your portfolio in order to bring asset class percentages back to your policy targets. Asset classes that have risen beyond predetermined limits are sold by an amount that brings the allocation back in line with policy targets, and those that have fallen in value are purchased in the same way. This is a method of buying low and selling high that is not based on trying to predict the direction of markets or asset returns. This rebalancing has the effect of enhancing portfolio returns while maintaining the agreed-upon risk.

Rebalancing

Asset allocations for your portfolio will change as financial markets rise and fall and the specific assets of different parts of your portfolio change. This creates the opportunity to selectively rebalance your portfolio in order to bring asset class percentages back to your policy targets. Asset classes that have risen beyond predetermined limits are sold by an amount that brings the allocation back in line with policy targets, and those that have fallen in value are purchased in the same way. This is a method of buying low and selling high that is not based on trying to predict the direction of markets or asset returns.

This rebalancing has the effect of enhancing portfolio returns while maintaining the agreed-upon risk. In order to limit rebalancing transactions and the costs associated with buying and selling mutual funds through the chosen custodian, Your Advisor or RIA Innovations has pre-determined ranges in which allocations may vary and at which rebalancing is initiated.

Specific Investments

While we generally select ETFs, mutual funds or similar securities, your advisor representative may, or we may at times select individual securities for client portfolios. In cases where we select an individual security, we examine each securities management, financial condition, and market position and ensure that any purchases of individual securities work towards the client's portfolio goals, investment horizons and exposure to risk.

Investment Strategy

As recent global and domestic economic events have indicated, performance of any asset or asset class is not guaranteed, and can indeed be unpredictable. As a result, there is a risk of loss of the assets we manage as a result of both allocation and the status of the markets when we rebalance.

While all current research, academia and data allow us to understand and map asset classes and their risk and return, there is a risk that they, or our analysis, are wrong and will lead to losses. Additionally, correlations among asset classes may be judged incorrectly, which also may incur risk of loss as diversification may not be properly balanced. Additionally, minor or severe market conditions may significantly drive gains or losses in one asset class over another, causing unexpected losses. There is a risk that rebalancing at any moment in time will not match current market directions, leading to risk of loss.

Risk of Loss

All investments include a risk of loss. In addition, as recent global and domestic economic events have indicated, performance of any investment is not guaranteed. As a result, there is a risk of loss of the assets we manage that may be out of our control. We use our best efforts as fiduciary to manage your assets. However, we cannot guarantee any level of performance or that you will not experience financial loss.

We will use our best judgment and act as fiduciary in rendering services to you. We cannot warrant or guarantee any particular level of account performance, or that the account will be profitable over time. Not every investment decision or recommendation made by us will be profitable. You assume all market risk involved in the investment of account assets under the agreement and understand that investment decisions made for any accounts are subject to various market, currency, economic, political and business risks. Except as may otherwise be provided by law, we will not be liable to you for (a) any loss that you may suffer by reason of any investment decision made or other action taken or omitted in good faith by us with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; (b) any loss arising from our adherence to your instructions; or (c) any act or failure to act by a custodian of your account. Nothing in this document shall relieve us from any responsibility or liability we may have under state or federal statutes.

Sales Aggregation

We have adopted policies and procedures for aggregating and allocating client securities transactions. If each client participating in an aggregate order receives its full allocation, then each participating client generally receives the average price per share paid or received for the purchased or sold securities. If each client participating in an aggregated order receives less than its full allocation, then each participating client generally receives its pro rata share of the executed order.

Voting Client Securities

We do not vote proxy for any of our clients or accounts. Each client is responsible for receiving and voting proxies for any and all securities maintained in their account. Clients may delegate proxy voting authority to a third-party representative (non-advisory personnel) by filing the appropriate custodial form(s). However, do not hesitate to contact your registered investment advisor if you need any help or clarification regarding proxies.

ITEM 7 – CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

Your Advisor is responsible for providing information to the portfolio manager.

ITEM 8 – CLIENT CONTACT WITH PORTFOLIO MANAGERS

You should speak directly with your advisor representative or Advisor with any questions about the contents of your accounts.

ITEM 9 – ADDITIONAL INFORMATION

9.a: Disciplinary information

We do not have any legal, financial or other “disciplinary” items to report to you. We are obligated to disclose any disciplinary event that would be material to you when evaluating our Firm and its associated persons.

9.b: Broker Dealers, Registered Representatives and other Relationships

Broker Dealers and Registered Representatives

Some employees of NWAM, LLC dba Northwest Asset Management are registered representatives of Purshe Kaplan Sterling Investments (PKS), a FINRA broker-dealer firm. Employees who are registered representatives are paid fees/commissions based on sales of securities, which may include 12b-1 fees. NWAM, LLC dba RIA Innovations employees acting as portfolio managers for RIA Innovations advisory firms do not act in the capacity of registered representatives and do not receive commissions or fees on the product that the Advisors’ client purchases.

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

Neither RIA Innovations nor our employees hold any of the above registrations.

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

Our primary business is that of a registered investment adviser and provider of portfolio management services.

Some of the principals and associated persons of the firm may be licensed as insurance agents and consultants.

When acting in the capacity of an insurance agent, they may receive the usual and customary commissions or fees associated with the insurance products that the client purchases. NWAM, LLC dba RIA Innovations employees acting as portfolio managers for RIA Innovations advisory firms do not act in the capacity of an insurance agent and do not provide insurance advice or recommendations to RIA Innovations advisory firms or their clients.

Selection of Other Advisors and How this Adviser is Compensated for those Selections

RIA Innovations does not select outside money managers or sub-advisors for RIA Innovations advisory firms or their clients.

9c: Code of Ethics, Participation or Interest in Client Transactions

Code of Ethics Description

We have adopted a Code of Ethics to which all employees are bound to adhere. The key component of our Code of Ethics states that we and our employees shall always:

- Act with integrity, competence, dignity, and ethically when dealing with the public, clients, prospects, employers, and employees.
- Exercise its authority and responsibility for the benefit and interest of its clients first and to refrain from having outside interests that conflict with the interests of its clients. We must avoid any circumstances that might adversely affect or appear to affect its duty of complete loyalty to its clients.
- Refrain from disclosing any nonpublic personal information about a client to any nonaffiliated third party unless the client expressly gives permission to us to do so. All client information will otherwise be treated as confidential.
- Maintain the physical security of nonpublic information, including information stored on computers.

This Code of Ethics is in place to guide the personal conduct of our team and embodies our fiduciary duties and responsibilities to you and sets forth our practice of supervising the personal securities transactions of employees with prior or concurrent access to client trade information. A copy of our Code of Ethics is available upon request from your advisor representative.

Securities in Which We May Have a Financial Interest

We will not recommend securities or other investment products to our clients in which our firm, employee or any related person has an ownership or proprietary interest.

Types of Personal Trading

RIA Innovations, or its employees, may buy and sell some of the same securities for our own accounts that we buy and sell for your account. We will buy or sell from clients' accounts before we buy or sell from our accounts. Additionally, we may buy or sell specific securities that it does not buy or sell for its clients' accounts, as the strategies defined for the clients account may not warrant it. RIA Innovations does not buy or sell between our, our employee or our clients' accounts.

Personal Trading and Timing

RIA Innovations always tries to get the best price for the client. There are possible conflicts of interest, which our Code of Ethics addresses. We have in place internal controls and processes to allow contemporaneous trading (submitting RIA Innovations or employee orders at the same time as client order) in block or aggregate trades. In other cases, except in the case of unaffiliated mutual funds, we will always trade individual securities in a client account before we trade RIA Innovations or employee accounts.

9d: Review of Accounts

Periodic Reviews

We are constantly reviewing the contents of our portfolios to ensure they contain the best matched and suitable securities and assets. Your advisor representative will work with you to determine the frequency and depth of reviews

of your account. You should refer to your Advisors ADV Part 2 A or advisory contract or talk to your advisor representative for additional information.

Regular Reports

You will receive reports as agreed upon with your advisor representative. Please refer to their ADV Part 2 A or advisory contract for details on reports. You will receive quarterly or monthly reports from your custodian, as agreed to with them.

9.e: Client Referrals and Other Compensation

Economic Benefits Provided by Third Parties for Advice Rendered to Clients

You will work with your Advisor to select which of our brokerage custodians will be used for account custody and transactions. NWAM, LLC dba RIA Innovations and Northwest Asset Management may receive from broker-dealers certain additional economic benefits (“Additional Services”) that may or may not be offered to any other independent investment Advisers participating in the program.

The custodian may provide Additional Services to us in its sole discretion and at its own expense, and we do not pay any fees for the Additional Services. We may have entered into a separate agreement (“Additional Services Addendum”) to govern the terms of the provision of the Additional Services. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving RIA Innovations and Northwest Asset Management participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to RIA Innovations and Northwest Asset Management by third party vendors.

Our receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to us, custodian most likely considers the amount and profitability of the assets in, and trades placed for, client accounts. The custodian or broker dealer always has the right to terminate the Additional Services Addendum with us, in its sole discretion, provided certain conditions are or are not met. Consequently, in order to continue to obtain the Additional Services, we may have an incentive to recommend to its Clients that the assets under management by us be held in custody with the custodian and to place transactions for Client accounts with the custodian. Our receipt of Additional Services does not diminish our duty to act in the best interests of Clients, including seeking best execution of trades for Client accounts.

Broker-dealers may also have paid for business consulting and professional services received by our related persons. Some of the products and services made available by broker-dealers through the program may benefit us but may not benefit Client accounts. These products or services may assist us in managing and administering client accounts, including accounts not maintained at the broker-dealer. Other services made available are intended to help us manage and further develop our business enterprise.

The benefits received by us or our personnel through participation in the program does not depend on the amount of brokerage transactions directed. As part of our fiduciary duties to clients, we endeavor at all times to put the interests of clients first. Clients should be aware, however, that the receipt of economic benefits by us or our related persons in and of itself creates a potential conflict of interest and may indirectly influence the our choice of broker-dealer for custody and brokerage services.

RIA Innovations will always act in accordance with all applicable federal and state regulations governing registered investment advisory practices.

Services that Benefit You.

You gain access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through some brokers include some to which might not otherwise be available or would require a significantly higher minimum initial investment by our clients.

Services that May Not Directly Benefit You.

Other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both from the broker and that of third parties. We may use this research to service all or some substantial number of clients' accounts, including accounts not maintained at the broker from which we received benefit. In addition to investment research, brokers may also make available software or other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts;
- assist with back-office functions, recordkeeping and client reporting;
- reports, publications and data on matters such as the economy, industries, sectors and individual companies or issuers, statistical information, account and law interpretations, technical market actions, credit analyses, risk management and analyses of corporate responsibility issues; and
- on-line news services and financial and market database services.

Services that Generally Benefit Only Us.

Some services intended to help us manage and further develop our business enterprise. These services include:

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

These services may come directly from a custodian/broker or in other cases, it will be arranged by third-party vendors. The broker may also discount or waive its fees for some of these services or pay all or a part of a third party's fees or us with other benefits such as occasional business entertainment of our personnel.

The availability of these services benefits us because we do not have to produce or purchase them, which may be a conflict of interest. We believe, however, that our selection of our custodians and brokers is in the best interests of our clients. It is primarily supported by the scope, quality and price of services and not just those services that benefit only us. In cases where minimum asset balances are required, we believe we will have no difficulties maintaining minimum valuation in order to avoid paying service fees or that maintaining them presents a material conflict of interest.

Charles Schwab

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at Schwab. The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

TD Ameritrade

We participate in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services

which include custody of securities, trade execution, clearance and settlement of transactions. We receive some benefits from TD Ameritrade through its participation in the Program.

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

We also receive from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment advisors participating in the program. Specifically, the Additional Services include Tamarac. TD Ameritrade provides the Additional Services to us in its sole discretion and at its own expense, and we do not pay any fees to TD Ameritrade for the Additional Services. NWAM, LLC and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services.

Our receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to us, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with us, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, we may have an incentive to recommend to Clients that the assets under management by us be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. Our receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including to seek best execution of trades for Client accounts.

Your Custody and Brokerage Costs

To provide this wrap program, we are charged a percentage of the dollar amount of assets or a transaction fee per trade in the account in lieu of commissions. These rates may be determined by committing a certain value of assets at a particular custodian/broker. This commitment benefits you because the overall rates you pay may be lower than they would be if we had not made the commitment.

Compensation to Non-Advisory Personnel for Client Referrals

We do not compensate anyone for client referrals.

Investment Discretion

RIA Innovation provides services on a non-discretionary basis.

9.f: Financial Information

We do not solicit prepayment from any RIA Innovations advisory firm nor its clients. RIA Innovations has no financial issues that could impair our ability to carry out our fiduciary duty to our clients. We have not been the subject of a bankruptcy petition in the last ten (10) years.