



## **Form ADV Part 2 – Disclosure Brochure**

**Effective: January 20, 2011**

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

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

Additional information about Allos and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2 - Material Changes

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

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

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

### Initial Filing

Allos is a new registered investment advisor. This is the initial filing of the Firm Brochure.

### Future Changes

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

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

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

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

### **Item 3 – Table of Contents**

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<b>ITEM 2 - MATERIAL CHANGES</b>	<b>2</b>
<b>ITEM 4 - ADVISORY SERVICES</b>	<b>4</b>
<b>ITEM 4 - ADVISORY SERVICES - CONTINUED</b>	<b>4</b>
<b>ITEM 5 - FEES AND COMPENSATION</b>	<b>5</b>
<b>ITEM 5 - FEES AND COMPENSATION - CONTINUED</b>	<b>7</b>
<b>ITEM 6 - PERFORMANCE-BASED FEES</b>	<b>7</b>
<b>ITEM 7 - TYPES OF CLIENTS</b>	<b>7</b>
<b>ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS</b>	<b>7</b>
<b>ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS - CONTINUED</b>	<b>8</b>
<b>ITEM 9 - DISCIPLINARY INFORMATION</b>	<b>8</b>
<b>ITEM 10 - OTHER FINANCIAL ACTIVITIES AND AFFILIATIONS</b>	<b>8</b>
<b>ITEM 11 - CODE OF ETHICS, PARTICIPATION IN CLIENT TRANSACTIONS AND PERSONAL TRADING</b>	<b>9</b>
<b>ITEM 12 - BROKERAGE PRACTICES</b>	<b>9</b>
<b>ITEM 13 - REVIEW OF ACCOUNTS</b>	<b>10</b>
<b>ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION</b>	<b>11</b>
<b>ITEM 15 - CUSTODY</b>	<b>11</b>
<b>ITEM 16 - INVESTMENT DISCRETION</b>	<b>11</b>
<b>ITEM 17 - VOTING CLIENT SECURITIES</b>	<b>12</b>
<b>ITEM 18 - FINANCIAL INFORMATION</b>	<b>12</b>

## Item 4 - Advisory Services

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### A. Firm Information

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

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

### B. Advisory Services Offered

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

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

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

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

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

## Item 4 - Advisory Services - continued

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## **B. Advisory Services Offered - continued**

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

## **C. Client Account Management**

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

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

## **D. Wrap Fee Programs**

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

## **E. Assets Under Management**

Allos was registered with the SEC in January 2011. Updated asset figures are calculated annually following the December 31, 2011 fiscal year end of the Advisor.

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## **Item 5 - Fees and Compensation**

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

#### **A. Fees for Advisory Services**

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

<b>Assets Under Management</b>	<b>Annual Rate (%)</b>
Up to \$25,000	2.00%
\$25,000 to \$99,999	1.50%
\$100,000 to \$499,999	1.35%
\$500,000 to \$999,999	1.15%
\$1,000,000 to \$1,999,999	1.00%
\$2,000,000 to \$3,999,999	0.75%
\$4,000,000 to \$5,999,999	0.60%
\$6,000,000 to \$9,999,999	0.50%
\$10,000,000 and over	0.40%

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

#### **B. Fee Billing**

Investment Management Fees will be automatically deducted from the Client Account by the Custodian. The Advisor shall send a quarterly invoice to the Custodian indicating the amount of the fees to be deducted from the Client Account. The amount due is calculated by applying the annual rate in the table above to the total assets under management with Allos at the end of each quarter. Each billing will be for a single quarter, paid in advance of the quarter. Clients will receive independent statements from the Custodian no less frequently than quarterly. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility.

#### **C. Other Fees and Expenses**

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

## **Item 5 - Fees and Compensation - continued**

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### **D. Advance Payment of Fees and Termination**

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

### **E. Compensation for Sales of Securities**

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

## **Item 6 - Performance-Based Fees**

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

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

## **Item 7 - Types of Clients**

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

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

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### **A. Methods of Analysis**

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

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



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

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### B. Risk of Loss

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

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

Allos generally employs investment strategies that do not involve any significant or unusual risk other than domestic equity and international market risks. The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts.

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

## Item 9 – Disciplinary Information

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

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

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

## Item 10 – Other Financial Activities and Affiliations

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

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

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



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

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### **A. Code of Ethics**

Allos has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Allos. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Allos and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Allos associates to adhere not only to the specific provisions of the Code but to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principals, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures.

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

### **B. Personal Trading and Conflicts of Interest**

Allos allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures.

We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

**At no time, will Allos or any associated person of Allos, transact in any security to the detriment of any Client.**

Allos is a Fee-Only advisor, who, in all circumstances, is **compensated solely by the Client**, with neither the advisor nor any related party receiving compensation that is contingent on the purchase or sale of any financial product. Allos does not engage in any transactions where it has a financial interest, including, but not limited to commissionable securities transactions, buying securities from or selling securities to its Clients.

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

## **Item 12 - Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

Allos does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services. The Client will select the broker-dealer or custodian (herein the "Custodian") to safeguard Client assets and authorize Allos to direct trades to this Custodian as agreed in the Investment Management Agreement. Further, Allos does not have the discretionary authority negotiate commissions on behalf of our Clients on a trade-by-trade basis.

## A. Recommendation of Custodian[s] - continued

Where Allos does not exercise discretion over the selection of the Custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended Custodian and will not incur any extra fee or cost associated with using a broker not recommended by Allos. Allos may recommend a Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the Custodian's offices. Allos does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

Allos participates in the TD Ameritrade Institutional program and typically recommends to Clients that they established their brokerage account[s] at TD Ameritrade Institutional ("TD Ameritrade"). TD Ameritrade is a division of TD Ameritrade, Inc., member FINRA/SIPC/NFA. TD Ameritrade is an independent and 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. Allos receives some benefits from TD Ameritrade through its participation in the program. Allos considers a number of factors in selecting and/or recommending brokers and custodians for its Clients' accounts, including, but not limited to, execution capability, experience and financial stability, reputation and the quality of services provided. Allos is not affiliated with, or related to, TD Ameritrade.

**1. *Soft Dollars*** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **Allos does not participate in soft dollar programs sponsored or offered by any broker-dealer.**

**2. *Brokerage Referrals*** - Allos does not receive any compensation from TD Ameritrade or any other entity in connection with the recommendation for establishing a brokerage account.

**3. *Directed Brokerage*** - All Clients are serviced on a "directed brokerage basis", where Allos and/or its parent, Searcy will place trades within the established account[s] at the Custodian designated by the Client. Further all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the Custodian, Allos will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated Custodian.

## B. Aggregating and Allocating Trades

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

## Item 13 - Review of Accounts

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### A. Frequency of Reviews

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

#### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify Allos if changes occur in his/her personal financial situation that might adversely affect his/her investment plan.

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

#### **C. Review Reports**

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

### **Item 14 - Client Referrals and Other Compensation**

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#### **A. Compensation Received by Allos**

Allos is a Fee-Only advisor, who, in all circumstances, is **compensated solely by the Client**. Allos does not receive commissions or other compensation from product sponsors, broker dealers or any un-related third party. Allos may refer Clients to various third-parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Allos may receive referrals of new Clients from a third-party.

#### **B. Client Referrals from Solicitors**

If a Client is introduced to Allos by either an unaffiliated party or by Searcy, Allos may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Any such referral fee shall be paid solely from the investment management fees earned by Allos, and shall not result in any additional charge to the Client. If the Client is introduced to Allos by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of his/her/its solicitor relationship. If Allos subsequently contacts or is contacted by the prospective Client, Allos shall provide each prospective Client with a copy of Allos' Form ADV 2 (the written disclosure statement also known as the "Brochure") and a copy of the solicitor's written disclosure document and a statement to the Client disclosing the terms of the solicitation arrangement between Allos and the solicitor, including the compensation to be received by the solicitor from Allos.

### **Item 15 - Custody**

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Allos does not accept or maintain custody of any Client accounts. All Clients must place their assets in a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct Allos to utilize that custodian for the Client's security transactions. For more information custodians and brokerage practices, see Item 12. Brokerage Practices.

### **Item 16 - Investment Discretion**

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Allos generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Allos. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Management Agreement containing all applicable limitations to such authority. All discretionary trades made by Allos will be in accordance with each Client's investment objectives and goals.

## **Item 17 - Voting Client Securities**

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Allos does not accept proxy voting responsibility for any Client. Therefore, although Allos may provide investment advisory services relative to Client investment assets, Allos Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the Client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Allos and/or the Client shall correspondingly instruct the Custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

## **Item 18 - Financial Information**

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