



E Six Thirteen, LLC d/b/a Dunavant Wealth Strategies

Form ADV Part 2A – Disclosure Brochure for Wealth Management Services provided by the Dunavant Wealth Division

Effective: June 29, 2017

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of E Six Thirteen, LLC d/b/a Dunavant Wealth Strategies (herein “Dunavant Wealth” or the “Advisor”). Dunavant Wealth is the Wealth Management division of E Six Thirteen, LLC.

If you have any questions about the contents of this Disclosure Brochure or require information regarding E Six Thirteen, LLC, please contact us at (985) 727-0775.

Dunavant Wealth is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Dunavant Wealth to assist you in determining whether to retain the Advisor.

Additional information about Dunavant Wealth and its advisory persons are available on the SEC’s website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 158200.

E Six Thirteen, LLC d/b/a Dunavant Wealth Strategies
2895 Highway 190, Suite 232
Mandeville, LA 70471
Phone: (985) 727-0775 Fax: (985) 727-0740
www.dunavantwealth.com

Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A* and *Part 2B*. *Part 2A* (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. *Part 2B* (the “Brochure Supplement”) provides information about advisory personnel of Dunavant Wealth.

Dunavant Wealth believes that communication and transparency are the foundation of its relationship and continually strive to provide our Clients with complete and accurate information at all times. Dunavant Wealth encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

- The fee breakdown for the Model Wealth Portfolio has been updated, please refer to Item 5 for additional information.
- The Advisor is transitioning as a state registered advisor to an SEC registered advisor.
- Eric Dunavant will be replacing Sandra Tackett as the Chief Compliance Officer of the Advisor.
- Eric Dunavant is no longer registered as a Registered Representative with LPL Financial LLC

Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 158200. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (985) 727-0775.

Item 3 – Table of Contents

Item 1 – Cover Page.....	1
Item 2 – Material Changes.....	2
Item 3 – Table of Contents.....	3
Item 4 – Advisory Services	4
Item 5 – Fees and Compensation.....	5
Item 6 – Performance-Based Fees and Side-By-Side Management.....	7
Item 7 – Types of Clients	7
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	7
Item 9 – Disciplinary Information	9
Item 10 – Other Financial Industry Activities and Affiliations	9
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	9
Item 12 – Brokerage Practices.....	10
Item 13 – Review of Accounts.....	11
Item 14 - Client Referrals and Other Compensation.....	11
Item 15 – Custody	11
Item 16 – Investment Discretion	12
Item 17 – Voting Client Securities	12
Item 18 – Financial Information	12
Form ADV 2B - Dunavant, Eric	13
Form ADV 2B - Tackett, Sandra	15
Form ADV 2B - Stoner, William.....	17
Privacy Policy.....	19

Item 4 – Advisory Services

E Six Thirteen, LLC d/b/a Dunavant Wealth Strategies (herein “Dunavant Wealth” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”), which is organized as a limited liability company (“LLC”) under the laws of Louisiana. The Advisor was established as a registered investment advisor in 2011 and is owned and operated by Eric L. Dunavant (President and Chief Compliance Officer). Dunavant Wealth is the wealth management division of E Six Thirteen, LLC.

This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Dunavant Wealth, including comprehensive wealth planning, asset management and targeted financial planning services.

Dunavant Wealth offers comprehensive wealth planning, asset management and financial consulting services to individuals and families in Louisiana and other states (each referred to as a “Client”). Wealth Management Clients receive initial and ongoing financial planning and investment management services.

Investment Management Services

Dunavant Wealth provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. Dunavant Wealth works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Dunavant Wealth provides unique asset management services to high net worth families and individuals.

Dunavant Wealth constructs portfolios with individual equity securities, exchange-traded funds (“ETFs”), individual fixed income securities and mutual funds to achieve the Client’s investment goals. The Advisor may also utilize publically traded real estate investments to meet the needs of its Clients. Clients will establish accounts in the Strategic Wealth Management (“SWM”) platform or the SWM II platform (In the SWM II platform, the Advisor absorbs securities transaction fees as detailed in Item 5.B). Smaller Client relationships may also be invested in a mutual fund wrap program called the Optimum Market Portfolio (“OMP”). Portfolio allocations to managed futures, if applicable, are typically implemented through unaffiliated managers in a managed accounts program (See below). Portfolio allocations to publically traded real estate if applicable, may be implemented along with other portfolio investments or by Mr. Dunavant in his separate capacity as a registered representative (See Item 10).

Dunavant Wealth’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Dunavant Wealth will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

Dunavant Wealth evaluates and selects ETFs and mutual funds for inclusion in Client portfolios only after applying their internal due diligence process. Dunavant Wealth may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Dunavant Wealth 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. Dunavant Wealth 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, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

Prior to rendering investment advisory services, Dunavant Wealth will ascertain, in conjunction with the Client, the Client’s financial situation, risk tolerance, and investment objective[s]. Dunavant Wealth will provide investment advisory and related services. At no time will Dunavant Wealth accept or maintain custody of a Client’s funds or securities except for the authorized deduction of the Advisor’s fees. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client investment advisory agreement.

Use of Independent Managers

Dunavant Wealth may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) for all or a portfolio of a Client’s investment portfolio. In such instances, the Client may be required to authorize enter into an advisory agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide investment management and related services. The Advisor may also assist in the development of the initial policy recommendations and managing the ongoing Client relationship. The Advisor will perform initial and ongoing oversight and due diligence over the selected Independent Manager[s] to ensure the Independent Managers’ strategies and target allocations remain aligned with its clients’ investment objectives and overall best interests. The Client, prior to entering into an agreement with unaffiliated investment manager[s] or investment platform[s], will be provided with the Independent Manager’s Form ADV 2A (or a brochure that makes the appropriate disclosures).

Prior to engaging Dunavant Wealth to provide investment advisory services, each Client is required to enter into one or more advisory agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client.

These services may include:

- Establishing an Investment Strategy – Dunavant Wealth, in connection with the Client, will develop an investment strategy to assist in achieving the Client’s investment goals and objectives.
- Asset Allocation – Dunavant Wealth will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance of risk for each Client.
- Portfolio Construction – Dunavant Wealth will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Dunavant Wealth will provide investment management and ongoing oversight of the Client’s investment portfolio.

Dunavant Wealth does not manage a wrap fee program. For certain Clients, the Advisor may include the securities transaction fees as part of its investment advisory fees above for discretionary trading following the Advisor’s strategies (See SWM II above). Further, at times, Dunavant Wealth may allocate all or a portion of a Client’s account[s] into a managed accounts program (See MWP above), which is structured similar to a wrap fee program (advisory fees, platform fees and transaction costs are rolled into a single fee). Lastly, smaller relationships may be invested in the OMP program, a wrap fee program. Please see Item 4.A above as well as Item 5. Fees and Compensation.

As of June 23, 2017, the Dunavant Wealth division manages \$102,383,507 in assets, all of which are on a discretionary basis. In addition, as of June 23, 2017, the Advisor also has \$102,889,642 in assets under advisement. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign one or more agreements that detail the responsibilities of Dunavant Wealth and the Client.

Investment Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the last business day of the preceding calendar quarter.

Investment advisory fees are based on investment program[s] in which the Client’s account[s] are invested and are based on the following schedule:

Assets Under Management	Annual Rate (%)	
	SWM/SWM II/MWP	OMP
Up to \$1,000,000	1.25%	1.40%
\$1,000,001 to \$3,000,000	1.00%	1.15%
\$3,000,001 to \$5,000,000	0.80%	0.95%
\$5,000,001 to \$15,000,000	0.60%	0.75%
\$15,000,001 and over	0.40%	0.55%

The investment advisory fee in the first quarter of service is prorated to the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Dunavant Wealth will be independently valued by the Custodian. Dunavant Wealth will not have the authority or responsibility to value portfolio securities.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Use of Independent Managers

For Clients referred by the Advisor to an Independent Manager, the Client's fee may be separately billed or deducted from the Client's account[s] by the Independent Manager.

Investment Management Services

Investment advisory fees are calculated by the Custodian and deducted from the Client's account[s]. The Client shall instruct the Custodian to automatically deduct the investment advisory fee from the Client's account[s] for each billing period and pay the investment advisory fee[s] to the Advisor. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Dunavant Wealth at the beginning of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. In addition, the Advisor will provide the Client an invoice itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. 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. Clients provide written authorization permitting Dunavant Wealth to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Use of Independent Managers

For Clients referred by the Advisor to an Independent Manager, the Client's fee may be separately billed or deducted from the Client's account[s] with the respective manager and a portion of the investment advisory fee may be provided to Dunavant Wealth.

Clients may incur certain fees or charges imposed by third parties, other than Dunavant Wealth, in connection with investment made on behalf of the Client's account[s]. For certain Clients, the Advisor may include the securities transaction fees as part of its investment advisory fees above for discretionary trading following the Advisor's strategy. Unless otherwise specified in the investment advisory agreement or other forms with the custodian, the Client shall be responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The investment advisory fee charged by Dunavant Wealth is separate and distinct from these custodian and execution fees. In addition, all fees paid to Dunavant Wealth for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. 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.

Investment Management Services

Dunavant Wealth is compensated for its services in advance of the quarter in which investment advisory services are rendered. Either party may request to terminate the investment advisory agreement with Dunavant Wealth, at any time, by providing advance written notice to the other party. In addition, the Client may terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the

Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

Use of Independent Managers

In the event that a Client should wish to terminate their relationship with the Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and that Independent Manager. Dunavant Wealth will assist the Client with the termination and transition as appropriate.

Dunavant Wealth does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Advisory Persons of Dunavant Wealth are also registered representatives of LPL Financial LLC ("LPL Financial"), a securities broker-dealer, and a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). In one's separate capacity as a registered representative of LPL Financial, an Advisory Person may implement securities transactions under LPL Financial and not through Dunavant Wealth. In such instances, an Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by an Advisory Person in one's capacity as a registered representative is separate and in addition to Dunavant Wealth's advisory fees. This practice presents a conflict of interest because Advisory Persons who are registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. We mitigate this conflict in two ways. First, Clients always have the right to choose whether to purchase securities products through one of our Advisory Persons. Second, Dunavant Wealth will not charge an ongoing investment advisory fee on any assets implemented in the separate capacity of one of our Advisory Persons. Please see Item 10.

Advisory Persons may also be licensed as independent insurance professionals. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, to mitigate this conflict, Clients always have the right to choose whether to purchase insurance products through any person affiliated with our firm.

Item 6 – Performance-Based Fees and Side-By-Side Management

Dunavant Wealth does not charge performance-based fees for its investment advisory services. The fees charged by Dunavant Wealth 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. Dunavant Wealth 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 to its Clients.

Item 7 – Types of Clients

Dunavant Wealth offers comprehensive wealth planning, asset management and financial consulting services to individuals and families in Louisiana and other states. The relative percentage of each type of Client is available on the Advisor's Form ADV Part 1. These percentages will change over time. Dunavant Wealth generally does not impose a minimum account size for establishing an asset management. For Principled Planning Complex, Dunavant Wealth requires a minimum initial wealth-planning fee of \$3,000. Dunavant Wealth has a minimum account size of \$250,000 per household, this minimum may be waived at the sole discretion of the Advisor.

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

Dunavant Wealth primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from Dunavant Wealth is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate.

As noted above, Dunavant Wealth generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Dunavant Wealth will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Dunavant Wealth 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.

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the risk of loss. Dunavant Wealth 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. Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating an investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process is included in Item 13.

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.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. **Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

Real Estate Investment Trusts ("REITs")

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. Equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving Dunavant Wealth or any of its Supervised Persons. Dunavant Wealth and its Supervised Persons 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 www.adviserinfo.sec.gov by searching with our firm name or our CRD# 158200.

Item 10 – Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

Certain Advisory Persons are also registered representatives of LPL Financial LLC. In an Advisory Person's separate capacity as a registered representative, the Advisory Person will typically receive commissions for the implementation of recommendations for commissionable transactions, this causes a conflict of interest. To mitigate this conflict Clients always have the right to choose whether to implement any recommendation provided by an Advisory Person of Dunavant Wealth, with any broker-dealer. The Advisor ensures that the implementation of recommendations to the Client is done in the best interest of the Client. In addition, neither Dunavant Wealth nor an Advisory Person will earn ongoing investment advisory fees in connection with any services implemented in the Advisory Person's separate capacity as a registered representative. Under supervision by LPL Financial, LPL Financial may have access to certain confidential information of the Client, including, but not limited to financial information, investment objectives, transactions and holdings information. Please see our Privacy Policy, which is included with this Disclosure Brochure.

Insurance Agency Affiliations

Certain Advisory Persons are also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from one's role with Dunavant Wealth. As an insurance professional, the Advisory Persons may receive customary commissions and other related revenues from the various insurance companies whose products are sold. The Advisor ensures that the implementation of recommendations to the Client is done in the best interest of the Client. The Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This causes a conflict of interest in recommending certain products of the insurance companies. Clients always have the right to choose whether to implement any recommendations made by an Advisory Persons an Advisory Person of Dunavant Wealth, with any insurance professional.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Dunavant Wealth has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Dunavant Wealth (our "Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Dunavant Wealth and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Dunavant Wealth associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (985) 727-0775.

Dunavant Wealth allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Dunavant Wealth does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advice an investment company. Dunavant Wealth does not have a material interest in any securities traded in Client accounts.

Dunavant Wealth allows our Supervised Persons 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 conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest when trading in the

same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Dunavant Wealth requiring reporting of personal securities trades in order to determine that the Advisory Persons is not putting the Client into a disadvantage and adhering to the policies and procedures by its Supervised Persons for review by the CCO, pursuant to its Code of Ethics. We have also adopted written policies and procedures to detect the misuse of material, non-public information. In addition, the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

Dunavant Wealth allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. The Advisor and its affiliated persons often trade alongside its Clients and will often include trades for the accounts of affiliated persons at the same time as its Clients. **At no time, will Dunavant Wealth or any Supervised Persons of Dunavant Wealth, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

Dunavant Wealth does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. As its Advisory Persons are also registered representatives of LPL Financial, Dunavant Wealth and its Advisory Persons are limited in the custodian[s] in which they can recommend to Clients. Typically, Dunavant Wealth will recommend that Clients establish their accounts at LPL Financial, where Dunavant Wealth has access to LPL Financial's systems, back office support, research and other benefits.

While Dunavant Wealth receives these economic benefits from LPL Financial, we believe LPL Financial provides quality execution and related services for our Clients at competitive prices. Price is not the sole factor Dunavant Wealth considers in evaluating best execution and the recommendation of a custodian. Dunavant Wealth also considers the quality of the brokerage services provided by LPL Financial, including the firm's reputation, execution capabilities, commission rates, and responsiveness to our Clients and our firm. Clients are free to use whatever Custodian they choose to implement financial planning recommendations. For additional information, please see Item 14.

Following are additional details regarding the brokerage practices of the Advisor:

- 1. Soft Dollars** - Soft dollars are programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. Dunavant Wealth receives soft dollar economic benefits from LPL Financial (Please see Item 14). Clients should be aware that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of the Custodian over one that does not furnish similar software, systems support, or services. To mitigate this conflict of interest the benefits received by the Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to LPL Financial. As part of its fiduciary duties to clients, the Advisor at all times puts the interests of its Clients first.
- 2. Brokerage Referrals** - Dunavant Wealth does not receive any compensation from any third party in connection with the recommendation for establishing an account.
- 3. Directed Brokerage** - The Advisor does not utilize directed brokerage and the Client has the ability to choose whom they utilize for a Custodian. If a client selects a custodian other than LPL the Advisor's ability to aggregate a trade may be negated.

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 Custodian. Dunavant Wealth will execute its transactions through the Custodian as directed by the Client. Dunavant Wealth may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian 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

Securities in Client accounts are monitored on a regular and continuous basis, at least monthly by Mr. Dunavant, President of the Advisor. Formal reviews are generally conducted at least annually.

In addition to the investment monitoring each Client account shall be internally 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 Dunavant Wealth 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.

The Client will receive brokerage statements no less than quarterly from the 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]. The Advisor or the Custodian may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 - Client Referrals and Other Compensation

Dunavant Wealth may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Dunavant Wealth does not receive compensation for these referrals. Likewise, Dunavant Wealth may receive non-compensated referrals of new Clients from various third-parties.

Participation in Institutional Advisor Platform

Dunavant Wealth has established an institutional relationship with LPL Financial to assist the Advisor in managing Client account[s]. The Advisor receives access to software and related support as part of its relationship with LPL Financial. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of the Custodian over one that does not furnish similar software, systems support, or services. Additionally, the Advisor receives the following benefits from LPL Financial: financial start-up support; reimbursement to Clients for transfer costs to the platform/custodian; financing services; receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

Dunavant Wealth does not engage paid solicitors for Client referrals.

Item 15 – Custody

Dunavant Wealth does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees, from the Client account at the Custodian. All Clients must place their assets with a qualified custodian. While Dunavant Wealth recommends LPL to be the Custodian, Clients are allowed to engage their own custodian to retain their funds and securities and direct Dunavant Wealth to utilize that Custodian for the Client's security transactions. Dunavant Wealth would be required to obtain permission to use a custodian other than LPL Financial due to the oversight role LPL Financial assumes over the Advisory Persons. Clients should review statements provided by the account custodian and compare to any invoices or reports provided by Dunavant Wealth to ensure accuracy, as the custodian does not perform this review. For more information about custodians and brokerage practices, see "Item 12".

Item 16 – Investment Discretion

Dunavant Wealth 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. These purchases or sales are subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Dunavant Wealth. 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 advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Dunavant Wealth will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Dunavant Wealth does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements and supporting information directly from the Custodian. If questions arise, Dunavant Wealth may assist in answering questions, but cannot accept proxy-voting responsibility.

Item 18 – Financial Information

Neither Dunavant Wealth, nor its management, have any adverse financial situations that would reasonably impair the ability of Dunavant Wealth to meet all obligations to its Clients. Neither Dunavant Wealth, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Dunavant Wealth is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 for services to be performed six months or more in advance.



Form ADV Part 2B – Brochure Supplement

for

Eric L. Dunavant
President and Chief Compliance Officer

Effective: June 29, 2017

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Eric L. Dunavant (CRD# 3255295) in addition to the information contained in the E Six Thirteen, LLC d/b/a Dunavant Wealth Strategies (“Dunavant Wealth” or the “Advisor”) Disclosure Brochure (contained herein). If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or Dunavant Wealth’s Disclosure Brochure, please contact us at (985) 727-0775.

Additional information about Eric L. Dunavant is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

The President and Chief Compliance Officer of Dunavant Wealth is Eric L. Dunavant. Mr. Dunavant, born in 1973. Mr. Dunavant earned a B.S. - Agribusiness from Texas A&M University in College Station, TX in 1996. Additional information regarding Mr. Dunavant's employment history is included below.

Employment History:

President and Chief Compliance Officer, E Six Thirteen, LLC	06/2011 to Present
Registered Representative, LPL Financial LLC	11/2007 to 05/2017
Investment Advisor Representative, LPL Financial LLC	11/2007 to 10/2011
Registered Representative, Charles Schwab & Co, Inc.	06/1999 to 11/2007

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Dunavant. Mr. Dunavant has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Dunavant. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. **As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Dunavant.** However, we do encourage you to independently view the background of Mr. Dunavant on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his CRD# 3255295.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Dunavant is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from one's role with Dunavant Wealth. As an insurance professional, Mr. Dunavant may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Dunavant is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This causes a conflict of interest in recommending certain products of the insurance companies. Clients are always have the right to choose whether to implement any recommendations made by Mr. Dunavant or the Advisor.

Item 5 – Additional Compensation

Mr. Dunavant has additional business activities were compensation is received, which are detailed in Item 4 above.

Item 6 – Supervision

Mr. Dunavant serves as the President and the Chief Compliance Officer of E Six Thirteen. Mr. Dunavant can be reached at (985) 727-0775.

Dunavant Wealth has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Dunavant Wealth. Further, Dunavant Wealth is subject to regulatory oversight by various agencies. These agencies require registration by Dunavant Wealth and its Supervised Persons. As a registered entity, Dunavant Wealth is subject to examinations by regulators, which may be announced or unannounced. Dunavant Wealth is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



Form ADV Part 2B – Brochure Supplement

for

**Sandra E. Tackett
Executive Operations Manager**

Effective: June 29, 2017

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Sandra E. Tackett (CRD# 5477280) in addition to the information contained in the E Six Thirteen, LLC d/b/a Dunavant Wealth Strategies ("Dunavant Wealth" or the "Advisor") (CRD # 158200) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Dunavant Wealth Disclosure Brochure or this Brochure Supplement, please contact us at (985) 727-0775.

Additional information about Ms. Tackett is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Sandra E. Tackett is the Executive Operations Manager of Dunavant Wealth. Ms. Tackett, born in 1967, is dedicated to advising Clients of Dunavant Wealth. Ms. Tackett earned a Bachelor of Science in Business Administration from McNeese State University in 1992. Additional information regarding Ms. Tackett's employment history is included below.

Employment History:

Executive Operations Manager, E Six Thirteen, LLC (06/2017 to Present) Chief Compliance Officer and Executive Operations Manager, E Six Thirteen, LLC (06/2014 to 06/2017) Executive Operations Manager, E Six Thirteen, LLC (01/2008 to Present)	01/2008 to Present
Registered Representative, LPL Financial LLC	01/2008 to 06/2017
Administrative Assistant, First Baptist Church	08/2004 to 01/2008

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Tackett. Ms. Tackett has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Tackett. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. **As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Tackett.** However, we do encourage you to independently view the background of Ms. Tackett on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her CRD# 5477280.

Item 4 – Other Business Activities

Notary Public

Ms. Tackett, in her separate capacity, is licensed as a notary public in the State of Louisiana. Clients may engage Ms. Tackett as a notary public and will be charged a separate fee from her role with Dunavant Wealth.

Item 5 – Additional Compensation

Ms. Tackett has additional business activities where compensation is received, which are detailed in Item 4 above.

Item 6 – Supervision

Ms. Tackett serves as the Executive Operations Manager of E Six Thirteen and is supervised by Eric Dunavant, the President and Chief Compliance Officer. Mr. Dunavant can be reached at (985) 727-0775.

Dunavant Wealth has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Dunavant Wealth. Further, Dunavant Wealth is subject to regulatory oversight by various agencies. These agencies require registration by Dunavant Wealth and its Supervised Persons. As a registered entity, Dunavant Wealth is subject to examinations by regulators, which may be announced or unannounced. Dunavant Wealth is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



Form ADV Part 2B – Brochure Supplement

for

**William A. Stoner
Financial Analyst**

Effective: June 29, 2017

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of William A. Stoner (CRD# 6384145) in addition to the information contained in the E Six Thirteen, LLC (“E Six Thirteen” or the “Advisor”, CRD# 158200) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the E Six Thirteen Disclosure Brochure or this Brochure Supplement, please contact us at (985) 727-0775.

Additional information about Mr. Stoner is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6384145.

Item 2 – Educational Background and Business Experience

William A. Stoner, born in 1991, is dedicated to advising Clients of E Six Thirteen as a Financial Analyst. Mr. Stoner also earned a Bachelor of Arts in Business Administration w/ Economic Concentration from Southeastern Louisiana University in 2013. Additional information regarding Mr. Stoner's employment history is included below.

Employment History:

Financial Analyst, E Six Thirteen, LLC	11/2016 to Present
Registered Representative, LPL Financial LLC	05/2015 to Present
Youth/College Associate, First Baptist Church Covington	05/2010 to 08/2014
Custodian, First Baptist Church Covington	05/2008 to 05/2010

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Stoner. Mr. Stoner has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Stoner. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Stoner.* However, we do encourage you to independently view the background of Mr. Stoner on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6384145.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Stoner is also a registered representative of LPL Financial LLC ("LPL"). LPL is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In Mr. Stoner's separate capacity as a registered representative, Mr. Stoner will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Stoner. Neither the Advisor nor Mr. Stoner will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Stoner's separate capacity as a registered representative.

Item 5 – Additional Compensation

Mr. Stoner has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Stoner serves as a Financial Analyst of E Six Thirteen and is supervised by Eric Dunavant, the President and Chief Compliance Officer. Mr. Dunavant can be reached at (985) 727-0775.

E Six Thirteen has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of E Six Thirteen. Further, E Six Thirteen is subject to regulatory oversight by various agencies. These agencies require registration by E Six Thirteen and its Supervised Persons. As a registered entity, E Six Thirteen is subject to examinations by regulators, which may be announced or unannounced. E Six Thirteen is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective: June 29, 2017

Our Commitment to You

E Six Thirteen, LLC d/b/a Dunavant Wealth ("Dunavant Wealth" or the "Advisor") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. Dunavant Wealth (referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does Dunavant Wealth provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

• Name and address	• Assets
• E-mail address	• Income
• Phone number	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

Information About You That Dunavant Wealth Shares

Dunavant Wealth works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy Dunavant Wealth's regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

To repeat, we do not sell your non-public personal information to anyone.

Information About Former Clients

Dunavant Wealth does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

Confidentiality and Security

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

We'll Keep You Informed

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at (985) 727-0775.