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**Wrap Fee Program Brochure  
January, 2017**

**This wrap fee program brochure provides information about the qualifications and business practices of Seasons of Advice Wealth Management. If you have any questions about the contents of this brochure, please contact us at [telephone number and/or email address to be added].**

**The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information Reliant Wealth Planning is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

## Item 2 Material Changes

Not Applicable.

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## Item 4 Services, Fees and Compensation

The Reliant Wealth Management Program (the “Wealth Management Program”) is a “wrap fee” investment advisory program. This Wrap Fee Brochure describes the business of Reliant as it relates to clients receiving services through the Wealth Management Program. Certain sections also describe the activities of the Firm’s Supervised Persons, which refer to any officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees, or other persons who provide investment advice on behalf of Reliant.

The Reliant Wealth Management Program combines discretionary asset management and transaction expenses into a single fee. Reliant currently maintains multiple model portfolios that are used as the basis for implementing a client’s investment plan in the Wealth Management Program. The models range from conservative, moderately conservative, moderate, moderately aggressive and aggressive and include taxable and non-taxable strategies. Each portfolio has varying degrees of asset categories and is reviewed with the client prior to implementation and periodically thereafter.

Reliant will periodically rebalance investments in the Reliant Wealth Management Program by buying and selling portfolio securities if the client’s asset allocation deviates from the desired model. Reliant will also periodically revise the model portfolios and make corresponding adjustments to client portfolios.

### **What is a “wrap fee” Program?**

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A wrap fee program allows our clients to pay a specified fee for investment advisory services and the execution of transactions. The advisory services includes portfolio management and the fee is not based directly upon transactions in your account. Your fee is bundled with our costs for executing transactions in your account(s). This results in a higher advisory fee to you. We do not charge our clients higher advisory fees based on their trading activity, but you should be aware that we may have an incentive to limit our trading activities in your account(s) because we are charged for executed trades. By participating in a wrap fee program, you may end up paying more or less than you would through a non-wrap fee program where a lower advisory fee is charged, but trade execution costs are passed directly through to you by the executing broker.

### **Investment Strategy**

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Reliant’s investment strategy for the Wealth Management Program is set forth in Item 6 Portfolio Manager Selection and Evaluation.

### **Asset-based Tiered Household Fee**

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Reliant offers services for a fee based upon the value of assets under management or advisement. Additionally, certain of the Firm’s Supervised Persons may offer insurance or brokerage products, when appropriate, under a separate commission-based arrangement.

An asset-based fee is calculated on a quarterly basis. The fee is payable in advance and will be debited directly from the client’s account(s). The fee will be calculated based upon the client’s account asset value on the last business day of each calendar quarter and will be debited from the client’s account in the following quarter. Quarters are defined as actual calendar quarters ending on Dec. 31, March 31, June 30 and Sept. 30. If a quarter ends on a Saturday, Sunday or market holiday, the quarter-end will be the last market business day of the calendar quarter. If the client has multiple accounts in their household, the asset-based fee will be based on the market value of assets in the client’s household.

An initial fee will be charged for new accounts that are not open a full quarter. The initial billing period begins when the client signs the Reliant fee agreement and Reliant accepts the fee agreement. The initial billing period is adjusted for the number of days remaining in the initial quarter and will run from the date the fee agreement is accepted through the last business day of the initial quarter.

Fees will be first debited from any free credit cash balance or money market in the client's account and if there is not enough available, Reliant has the discretion to sell securities in order to make cash available for the fee.

To calculate the tiered household fee, Reliant will use the market value of all assets under management in the client's household and will multiply the asset value at each tier by the fee % applicable to that tier according to the following chart:

Household Asset Under Management		Fee %
0.00	249,999.99	1.38
250,000.00	499,999.99	1.24
500,000.00	999,999.99	1.10
1,000,000.00	1,999,999.99	0.96
2,000,000.00	2,999,999.99	0.83
3,000,000.00	4,999,999.99	0.70
5,000,000.00	Above	Negotiable

The result will be divided by 4 to calculate the quarterly fee per tier. All applicable tiers will be added together to result in the total quarterly fee.

The following chart shows an example of the fee billing calculation for a hypothetical portfolio with household assets under management of \$2,100,000.

Household Asset Under Management		Fee %	Client's Asset Value per Tier	Client's Quarterly Fee
0.00	249,999.99	1.38	249,999.99	\$862.50
250,000.00	499,999.99	1.24	249,999.99	\$775.00
500,000.00	999,999.99	1.10	499,999.99	\$1,375.00
1,000,000.00	1,999,999.99	0.96	999,999.99	\$2,400.00
2,000,000.00	2,999,999.99	0.83	100,000.04	\$207.50
3,000,000.00	4,999,999.99	0.70	0.00	\$0.00
5,000,000.00	Above	Negotiable	0.00	\$0.00
<b>TOTAL</b>		<b>1.07% Effective Rate</b>	<b>2,100,000.00</b>	<b>\$5,620.00</b>

Arrangements can be made to deduct one account's fee portion from another account (i.e. pay the fee for a retirement account from a non-retirement account).

If Reliant Wealth Planning or the client terminates the fee arrangement, a pro-rated refund from the date of termination through the end of the applicable billing period will be credited to the client's account.

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**Fee Discretion**

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Reliant may, in its sole discretion, negotiate to charge a lesser fee based upon certain factors, such as the length of relationship or the fact it is pre-existing, pro bono activities, or anticipated future additional assets.

Reliant may also charge a fixed rate dollar amount as a fee for certain consulting and project work done for the client. The scope of work and fee will be agreed upon before work commences, with half the fee being paid in advance and the remaining remitted upon project delivery.

The minimum fixed rate fee is: \$500

The maximum fixed rate fee is: \$10,000

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**Other Types of Fees and Expenses**

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Clients do not pay brokerage commissions or other fees to their Custodian in connection with the Reliant Wealth Management Program (as described in the Wealth Management Program Disclosure Brochure). However, clients may incur charges imposed directly by a mutual fund, index fund, or exchange traded fund, which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, step-out fees, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions. These fees are not included within the wrap-fee you are charged by our firm. Brokerage arrangements are further described in Item 12 Brokerage Practices, of the Firm's General Disclosure Brochure.

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**Other Compensation**

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As described in Item 12 Brokerage Practices, of the Firm's General Disclosure Brochure, RJFS provides Reliant products and services that benefit us but may not directly benefit the client or its account. RJFS may discount or waive its fees for some services or pay all or a part of a third party's fees. RJFS also provides us with other benefits such as occasional business entertainment of our personnel and forgivable and non-forgivable loans to assist our business operations.

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**Account Additions and Withdrawals**

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

## Item 5 Account Requirements and Types of Clients

Clients eligible to enroll in the Program include individuals, IRAs and revocable and irrevocable trusts. There is no minimum investment required to open an account in the Program.

## Item 6 Portfolio Manager Selection and Evaluation

### **Reliant Wealth Management Program**

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Reliant acts as the sponsor and sole portfolio manager of the Wealth Management Program. Clients' investment portfolios are managed directly by Reliant on a discretionary basis and nondiscretionary basis. As Reliant is the sole portfolio manager a conflict of interest exists because Reliant receives the entire management fee and is therefore has an incentive to manage the client's entire portfolio rather than utilize the services of one or more sub-advisors. Reliant, however, believes it can provide overall portfolio management services at a lower price than if it were to utilize the services of one or more sub-advisors.

### **Investment Strategies**

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Reliant begins the portfolio building process by using various techniques to gauge both a client's Risk Aversion (emotional ability to handle risk) and Risk Capacity (financial ability to withstand risk). This information is considered along with information gained through any financial planning completed to construct a portfolio structure of one or more investment layers. This creates a portfolio with the goal of achieving a client's stated financial goals, while attempting to utilize an amount of risk which is emotionally and situationally appropriate. Reliant primarily allocates client investments into pooled investments (such as but not restricted to mutual funds and exchange traded funds), and cash flow vehicles (such as but not restricted to variable or index annuities). As appropriate, individual fixed income or equity securities will also be used.

The client's individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned securities. Each portfolio will be initially designed to meet a particular investment goal, which we determine to be suitable to the client's circumstances. Once the appropriate portfolio has been determined, we review the portfolio at least quarterly and if necessary, rebalance the portfolio based upon the client's individual needs, stated goals, and objectives.

Clients may impose reasonable restrictions or mandates on the management of their accounts if we determine, in our sole discretion, the conditions will not materially impact the performance of a portfolio strategy or prove overly burdensome to the Firm's management efforts.

Portfolio Manager Selection and Evaluation analyzes each recommended investment using a variety of tools and services including, but not limited to, MoneyGuidePro, Morningstar, Lipper, and RJFS's institutional research tools. The investments are benchmarked for comparison to an appropriate category index, assigned a fiduciary score as determined by Fiduciary Analytics and monitored with star ranking based on Morningstar analysis.

### **Risk of Loss**

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Past performance is not indicative of future results. Therefore, current and prospective clients should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, bonds, and pooled investment vehicles) involves risk

of loss. Further, depending on the different types of investments there may be varying degrees of risk. Clients and prospective clients should be prepared to bear investment loss including loss of original principal.

We do not represent to any client, either directly or indirectly, any level of performance or any representation that our professional services will not result in a loss to the Client's invested assets. We do our very best as an investment adviser to manage risk exposures and to prevent losses; however, losses cannot be prevented in all cases. Below are certain additional risks associated when investing in securities through our investment management program.

- **Market Risk** – Any market, whether stocks, bonds, or other asset classes goes up and down as a result of overall market conditions. When markets go down, this can result in a decrease in the value of client investments. This is also referred to as systemic risk.
- **Equity (stock) market risk** – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- **Fixed Income Risk** – When investing in bonds, there is the risk that issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- **ETF and Mutual Fund Risk** – When our firm invests in an ETF or mutual fund, it will bear additional expenses based on its pro rata share of the ETFs or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities held by the ETF or mutual fund, including equities, fixed income, commodities, and derivatives on such securities. In addition, ETFs and closed-end mutual funds may trade at a premium or discount to the net asset value of their underlying portfolio securities. As a result, there is a risk that an investment in an ETF or a closed end mutual fund may result in the client paying more for, or selling for less, the portfolio securities, than a direct investment in the underlying securities. This risk, however, is offset by the additional costs of investing directly in the underlying securities.
- **Liquidity Risk** – High volatility and/or the lack of deep and active liquid markets for a security may prevent a Client from selling their securities at all, or at an advantageous time or price because Reliant and the Client's broker may have difficulty finding a buyer and may be forced to sell at a significant discount to market value. Some securities (including ETFs) that hold or trade financial instruments may be adversely affected by liquidity issues as they manage their portfolios.
- **Concentration Risk** – Portfolios managed by Reliant may from time to time be concentrated in a single security, geographic region, or asset class. The value of Client accounts will vary considerably in response to changes in the market value of that individual security, region or asset class. This may result in higher volatility.
- **Foreign Investing and Emerging Markets Risk** – Foreign investing involves risks not typically associated with U.S. investments, and the risks may be exacerbated further in emerging market



countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social and economic developments affecting one or more foreign countries. In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.

- **Inflation, Currency, and Interest Rate Risks** – Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline. In addition, the relative value of the U.S. dollar-denominated assets primarily managed by Reliant may be affected by the risk that currency devaluations affect Client purchasing power.
- **Legislative and Tax Risk** – Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment advisor or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities; and changes in the tax code that could affect interest income, income characterization and/or tax reporting obligations (particularly for ETF securities dealing in natural resources). In certain circumstances a Client may incur taxable income on their investments without a cash distribution to pay the tax due.
- **Counterparty Risk** – Counterparty risk is the risk to Reliant that the counterparty to a services contract will not fulfill its contractual obligations. Should the counterparty fail to fulfill its obligations to Reliant, clients could potentially incur significant losses and may have access to their accounts and investments limited or restricted.
- **Advisory Risk** – There is no guarantee that Reliant's judgment or investment decisions about particular securities or asset classes will necessarily produce the intended results. Reliant's judgment may prove to be incorrect, and a Client might not achieve her investment objectives. In addition, it is possible that we fail to manage our business such that Reliant remains a going concern which would be disruptive to our Clients as they would need to find a new investment advisor.

**The foregoing list of risk factors does not purport to be a complete enumeration or explanation of the risks involved in an investment in any or all of the strategies managed by Reliant. Prospective Clients should read this entire Form ADV and all accompanying materials provided by Reliant before deciding whether to invest with us. In addition, as our investment philosophy develops and changes over time, an investment with Reliant may be subject to additional and different risk factors. Reliant will promptly amend this Brochure if and when any information regarding its investment risks becomes materially inaccurate.**

## **Methods of Analysis**

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Reliant generally utilizes a combination of fundamental and technical methods of analysis. Fundamental analysis involves an evaluation of an issuer's fundamental financial condition and competitive position. Reliant generally analyzes the financial condition, capabilities of management, earnings capacity, new products and services, as well as the company's markets and position amongst its industry competitors in order to determine the recommendations made to clients. A substantial risk in relying upon fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.

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

## **Performance-Based Fees and Side-By-Side Management**

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

## **Voting of Client Securities**

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Reliant does not accept the authority to vote clients' securities (i.e., proxies) on their behalves. Clients receive proxies directly from their custodian and may contact the Reliant with any questions by calling the number on the cover of this Wrap Fee Brochure.

## **Item 7 Client Information Provided to Portfolio Managers**

We are required to describe the information about you that we communicate to your portfolio manager(s), and how often or under what circumstances we provide updated information.

Reliant, as the portfolio manager, for the Wealth Management Program, encourages clients to promptly notify the firm if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Reliant communicates with clients on a regular basis as needed to ensure your most current investment goals and objectives are understood and reflected in your portfolio. In most cases, we will communicate such information as part of our regular investment management meetings, which are scheduled quarterly for clients in the Reliant Wealth Management Program.

## **Item 8 Client Contact with Portfolio Managers**

Clients are always free to directly contact Reliant, their portfolio manager, with any questions or concerns they have about their portfolios or other matters.

## Item 9 Additional Information

### **Disciplinary Information**

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Reliant is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management. Reliant does not have any required disclosures for this Item.

### **Other Financial Industry Activities and Affiliations**

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Clients can engage certain persons associated with Reliant (but not the Firm directly) to render securities brokerage services under a separate commission-based arrangement. Clients are under no obligation to engage such persons and may choose brokers or agents not affiliated with Reliant.

Under this arrangement, the Firm's Supervised Persons, in their individual capacities as registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS"), may provide securities brokerage services and implement securities transactions under a separate commission based arrangement. Supervised Persons may be entitled to a portion of the brokerage commissions paid to PKS, as well as a share of any ongoing distribution or service (trail) fees from the sale of variable annuities and mutual funds. Reliant may also recommend no-load or load-waived funds, where no sales charges are assessed. Prior to effecting any transactions, clients are required to enter into a separate account agreement with PKS.

The Firm's Supervised Persons may receive commissions for transactions that are executed through their PKS registered representative relationship, but held with the issuer of a variable annuity. In such circumstance, the assets purchased or sold with a commission relationship will be in accounts separate, or otherwise tracked separately, from those assets over which the Firm provides management services and charges management fees.

A conflict of interest exists to the extent that Reliant recommends the purchase or sale of securities where its Supervised Persons receive commissions or other additional compensation as a result of the Firm's recommendation. The Firm has procedures in place to ensure that any recommendations made by such Supervised Persons are in the best interest of clients. For certain accounts covered by the Employee Retirement Income Security Act of 1974 ("ERISA") and such others that Reliant, in its sole discretion, deems appropriate, Reliant may provide its investment advisory services on a fee-offset basis. In this scenario, Reliant may offset its fees by an amount equal to the aggregate commissions and 12b-1 fees earned by the Firm's Supervised Persons in their individual capacities as registered representatives of PKS.

### **Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

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Reliant and persons associated with Reliant ("Associated Persons") are permitted to buy or sell securities that it also recommends to clients consistent with Reliant's policies and procedures.

Reliant has adopted a code of ethics that sets forth the standards of conduct expected of its associated persons and requires compliance with applicable securities laws ("Code of Ethics"). Reliant's Code of Ethics contains written policies reasonably designed to prevent the unlawful use of material non-public information by Reliant or any of its associated persons. The Code of Ethics also requires that certain Reliant personnel (called "Access Persons") report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings.

When Reliant is engaging in or considering a transaction in any security on behalf of a client, no Access Person may affect for themselves or for their immediate family (i.e., spouse, minor children, and adults living in the same household as the Access Person) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the Access Person is completed as part of a batch trade with clients; or
- a decision has been made not to engage in the transaction for the client.

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

This Code of Ethics has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by Access Persons to be completed without any appreciable impact on the markets of such securities. Therefore, under certain limited circumstances, exceptions may be made to the policies stated above.

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

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#### **Account Reviews**

Accounts are formally reviewed with each client quarterly, semi-annually or annually as may be agreed upon with the client. A special review of a Client's account may be triggered by changes in tax law, economic climate, or market conditions. A review may be initiated by a Client inquiry due to personal changes in his/her financial affairs.

Reports to clients are individualized, therefore the nature and frequency are determined by client need and the services offered. Clients will also receive monthly, quarterly, and/or annual statements from investment companies, product sponsors, broker-dealers, and custodians, as applicable. Financial planning clients receive no reports other than the financial plan and any other mutually agreed upon reports.

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#### **Account Statements and General Reports**

Clients are provided with transaction confirmation notices and regular summary account statements directly from RJFS or the custodian for their accounts.

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#### **Client Referrals and Other Compensation**

Reliant is required to disclose any relationship or arrangement where it receives an economic benefit from a third party (non-client) for providing advisory services. In addition, Reliant is required to disclose any direct or indirect compensation that it provides for client referrals. Reliant does not have any required disclosures to this item.

Reliant generally recommends that clients utilize the custody, brokerage and clearing services of Raymond James Financial Services ("RJFS"). The factors which Reliant considers includes the respective financial strength, reputation, execution, pricing, research and overall service provided by RJFS.

Reliant receives an economic benefit from RJFS in the form of forgivable and non-forgivable loans and support products and services. These loans, products and services, how they benefit us, and the related

conflicts of interest are described in the Part 2 of the Firm's ADV Brochure under Item 12 Brokerage Practices. The availability to us of RJFS's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

#### **Financial Information**

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Reliant is not required to disclose any financial information pursuant to this Item due to the following:

- The firm does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance;
- The firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The firm has not been the subject of a bankruptcy petition at any time during the past ten years.