



Bellwether Advisors, LLC

dba Bellwether Wealth
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This brochure provides information about the qualifications and business practices of Bellwether Advisors, LLC dba Bellwether Wealth ("Bellwether Wealth"). If you have any questions about the contents of this brochure, please contact us at the number listed above or by email at info@bellww.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Bellwether Wealth is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Bellwether Wealth also is available on the SEC's website at WWW.ADVISERINFO.SEC.GOV. You can search this site by a unique identifying number, known as a CRD number. Bellwether Wealth's CRD number is 300012.

ITEM 2 – SUMMARY OF MATERIAL CHANGES

There are no material changes since the March 4, 2020 Form ADV filing on the IARD system.

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ITEM 4 – ADVISORY BUSINESS

Bellwether Advisors, LLC dba Bellwether Wealth (“Bellwether Wealth”) is a registered investment adviser as of January 2019. Bellwether Wealth’s sole member is Clark Bellin, who wholly owns us. We provide investment advice to individuals, retirement plans, trusts, estates, charitable organizations, corporations and other business entities. We also provide advice to clients on financial planning, retirement planning, estate planning, tax planning and on matters that include, but are not limited to, life insurance, long-term care insurance, 529 plans and other similar financial matters. We are a fiduciary and are required to act in a client’s best interest at all times. As of December 31, 2019, we manage a total of assets under management of \$234,348,334 with \$230,687,879 on a discretionary basis and \$3,660,455 on a non-discretionary basis.

Investment Management

We use a time-tested, disciplined approach to investing. We are a “total portfolio” manager using active and passive, diversified investment approaches. We believe that a portfolio should be diversified, and excess returns can be achieved by overweighting undervalued asset classes and investment styles. Typically, we use model portfolios that meet the individual needs and risk tolerances of our clients. If you desire, you may impose restrictions on the securities or types of securities you would like us to invest in.

Financial Planning

Sound financial planning services can help clients identify the strengths and weaknesses of their long-term financial health. We have years of experience in this area and sophisticated software tools available to assist our clients in developing comprehensive financial plans that guide them toward the accomplishment of their goals.

Retirement Planning

Retirement planning and financial planning are not one and the same. We have worked with many clients through their earning years and into the distribution phase of their lives. We assist clients with the management of their portfolios to ensure longevity through retirement while at the same time providing needed income. We have experience working with clients on a range of retirement planning issues, including rollover of 401(k) plans, level of income needed for retirement and tax-efficient distribution of after-tax and before-tax assets.

Estate Planning

Good estate planning advice can save a client thousands of dollars in probate fees and estate taxes. We provide a full range of estate planning services, all of which are designed to help clients achieve their personal and financial goals. These services generally include, but are not limited to, advice regarding the accumulation, retention and transfer of assets. Consideration also is given to the income, gift and estate tax consequences of a situation.

Tax Planning

Whether it’s the sale of a security, the exercise of a stock option, the transfer of real estate or the gifting of appreciated securities, advance planning regarding the tax impact of a transaction is critical. Our team has many years of experience in assisting clients with tax issues.

Our goal is to help our clients minimize their lifetime tax liability so they can hold onto the hard-earned dollars they work their entire careers to amass.

As part of our investment strategy, we may recommend allocating portions of a client's assets to mutual funds, Exchange Traded Funds, or publicly traded REITs. We annually conduct due diligence and monitor the performance on an ongoing basis of the investment vehicles.

ITEM 5 – FEES AND COMPENSATION

We are a fee-based advisor. This means we get paid a fee for our investment management services based on the average daily market value of your assets under management in the preceding month. We typically bill for our fees monthly, payable in advance. Our minimum account size and fees are negotiable in certain circumstances. Fees can be paid by having them deducted directly from your account or by check. The choice is yours. In either case, we provide you with a fee statement. Our annual fee schedule is as follows:

Total Assets Under Management	Annual Fee*
Up to \$500,000	1.25%
\$500,001 to \$1,000,000	1.00%
\$1,000,001- \$2,500,000	0.90%
\$2,500,000- \$5,000,000	0.825%
\$5,000,001-\$10,000,000	0.750%
\$10,000,001-\$25,000,000	0.625%
\$25,000,001-\$50,000,000	0.500%
\$50,000,001 and up	0.375%

*Our minimum fee is \$3125 based on assets, but we may also negotiate additional fixed fees for planning/projects for smaller accounts and we, in our sole discretion, may negotiate to reduce any fee. AUM excludes any non-managed assets held in a managed account. A non-managed asset includes any asset that you have directed us to hold and not trade.

Asset Management Fee Calculation Example

A client with \$3,000,000 in Assets Under Management would annually be billed as follows: The first \$500,000 is billed at a 1.25% annual rate (Tier 1), the next \$500,000 is billed at a 1.00% annual rate (Tier 2), the next \$1,500,000 is billed at a 0.90% annual rate (Tier 3), and the next \$500,000 is billed at a 0.825% annual rate (Tier 4). The chart below further illustrates the manner in which the fee is calculated:

	AUM	Annual Fee %	Annual Fee \$
Tier 1	\$ 500,000	1.25%	<u>\$ 6,250</u>
Tier 2	\$ 500,000	1.00%	<u>\$ 5,000</u>
Tier 3	\$ 1,500,000	0.90%	\$13,500
Tier 4	<u>\$ 500,000</u>	<u>0.825%</u>	<u>\$ 4,125</u>
Total	\$3,000,000	0.96%	\$28,875

Our minimum account size is \$250,000

We do not currently charge a fee to an investment client for a financial plan. For non-investment clients, we charge a fee of \$3,000 for a financial plan billed at the completion of the plan.

We will also bill an hourly rate of \$300 per hour for certain projects. An estimate of the project completion time will be discussed with the client.

In investing your portfolio, we will likely use one or more mutual funds. If we do, you will incur mutual fund fees and expenses that are in addition to the fees we charge you. Mutual funds pass these fees and expenses on to investors directly - they are not charged nor billed by us.

We use Charles Schwab & Co., Inc. ("Schwab"), a registered broker-dealer and member of the Securities Investor Protection Corporation, as our custodian. Through our use of Schwab's services, you will incur certain trading costs in addition to our fees. These costs are further explained in Item 12 below.

Commissionable Securities Sales

Representatives of our firm are registered representatives of Purshe Kaplan Sterling ("PKS"), member FINRA/SIPC. As such they are able to accept compensation for the sale of securities or other investment products, including distribution or service ("trail") fees from the sale of mutual funds and variable annuities, variable life and variable universal life. Clients should be aware that the practice of accepting commissions for the sale of securities presents a conflict of interest and gives our firm and/or our representatives an incentive to recommend investment products based on the compensation received. Our firm generally addresses commissionable sales conflicts that arise when explaining to clients these sales create an incentive to recommend based on the compensation to be earned and/or when recommending commissionable mutual funds, explaining that "no-load" funds are also available. Our firm does not prohibit clients from purchasing recommended investment products through other unaffiliated brokers or agents.

Termination and Refund of Fees

The Discretionary Investment Management Agreement may be terminated at any time upon receipt of notice to terminate by either party to the other. If you terminate the Agreement after the commencement of a calendar billing period, the unearned portion of the Management Fee will be promptly refunded.

ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

We do not charge performance-based fees nor do we engage in side-by-side management.

ITEM 7 – TYPES OF CLIENTS

We provide investment advice to individuals, retirement plans, trusts, estates, charitable organizations, corporations and other business entities. Minimum account size is \$250,000, but we reserve the right to manage smaller accounts.

ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Please remember that any time you invest in securities of any type, there is risk of loss of principal that you should be prepared to bear.

Methods of Analysis

Our disciplined, diversified investment approach is designed to achieve excess returns by overweighting undervalued asset classes and investment styles. Our approach incorporates a number of different methods of analysis. In order to determine undervalued asset classes, we use fundamental, technical and cyclical analysis. Fundamental analysis helps us determine how cheap or expensive an asset class or security is by itself. Technical analysis is a study of the supply and demand of investors and where they are investing their money at a particular time. Cyclical analysis is a study of where the economy is in the business cycle and which asset classes should perform best over the next several months. We use fundamental, technical and cyclical analysis and a proprietary model to assist in the determination of which investment styles to overweight. Our proprietary model is based on the concept of reversion to the mean – this means that investment styles that are overvalued will fall in value and undervalued styles will rise in value to revert to the mean performance over time. Our investment committee uses these methods to determine the appropriate weightings for asset classes, investment styles and appropriate investment vehicles. There is a risk of loss of principal due to the fact that these methods may not prove successful at times, especially during unexpected market events or catastrophic events.

Investment Strategies

We use several investment strategies for our clients' portfolios depending on the risk tolerance and return objectives for each of our clients. Bellwether Wealth's investment committee determines the appropriate asset class allocation, investment vehicles and appropriate risk levels for each investment strategy. Bellwether Wealth's core investment strategies are: aggressive growth, growth, growth and income and conservative. Each of these core strategies may invest in mutual funds, exchange traded funds, individual equities, fixed income, alternatives and/or cash. The level of equities in a clients' portfolio will be highest for someone invested in our aggressive growth strategy and lowest for someone invested in our conservative strategy.

Fixed Income Strategy: We have a few clients that have a portfolio invested solely in fixed income investments. Bellwether Wealth's approach in these situations is to overweight styles and maturity lengths we believe will outperform the market going forward. This approach is based primarily on our cyclical analysis. We may use both mutual funds and individual bonds depending on client goals as outlined in their respective investment policy statements. Our fixed income strategy is subject to risk of loss of principal through rising interest rates, bond market dislocation, lack of liquidity in the bond market and security downgrades. We also use high yield bond mutual funds which are subject to a higher default rate than traditional bonds.

Alternative Investment Strategies

At certain times, we have the ability to invest in what we consider to be alternative investments. Our exposure to alternative investments is done through mutual funds, partnerships, and ETF's in our core strategies. Examples of alternative investments that we may invest in, but are not limited to, are a mutual fund or ETF (either short or long) that owns commodities, currencies or country funds. We may also use financial leverage in these funds. If applicable, the amount of alternative investments allowed in a client's portfolio is outlined in each client's notes. There is a risk of loss of principal in alternative investments because they may be undiversified and this risk of loss is compounded by any alternative that uses leverage.

ITEM 9 – DISCIPLINARY INFORMATION

We, nor anyone on our management team, have been, or is currently, subject to any criminal, civil or disciplinary action.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Several representatives of our firm are registered representatives of PKS, member FINRA/SIPC, and licensed insurance agents. As a result of these transactions, they receive normal and customary commissions. A conflict of interest exists as these commissionable securities sales create an incentive to recommend products based on the compensation earned. To mitigate this potential conflict, our firm will act in the client's best interest.

ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

We have adopted a Code of Ethics, the full text of which is available to clients upon request. We have several goals in adopting this Code. First, we desire to comply with all applicable laws and regulations governing its practice, and our management has determined to set forth guidelines for professional standards, under which all of our associated persons are to conduct themselves. We have set high standards, the intention of which is to protect client interests at all times and to demonstrate its commitment to its fiduciary duties of honesty, good faith and fair dealing with Clients. All associated persons are expected to adhere strictly to these guidelines, as well as the procedures for approval and reporting established in the Code of Ethics primarily related to personal securities transactions, and violations of the Code. In addition, we maintain and enforce written policies reasonably designed to prevent the misuse of material non-public information by us or any person associated with us. Please contact our Chief Compliance Officer at (402) 476-8844 to obtain a complete copy of our Code of Ethics.

ITEM 12 – BROKERAGE PRACTICES

We do not maintain physical custody of the assets we manage on your behalf. Your assets must be maintained in an account at a "qualified custodian," generally defined as a broker-dealer or bank. We typically recommend that our clients use Schwab as our qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab holds your assets in a brokerage account and buys and sells securities when we instruct them to. You will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we usually assist you in doing so. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below.

How We Select Brokers/Custodians

We seek to use a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services
- Capability to execute, clear and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.).
- Reputation, financial strength and stability
- Prior service to us and our clients
- Availability of other products and services that benefit us, as discussed below (see *"Products and Services Available to Us From Schwab"*)

Your Brokerage and Custody Costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Schwab also receives a portion of the management fees charged by any mutual fund we invest your assets in. Schwab's commission rates applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. This commitment benefits you because the overall commission rates you pay are lower than they would be otherwise. In lieu of commissions, Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above.

Products and Services Available to Us From Schwab

Schwab Advisor Services™ is Schwab's division that serves independent investment advisory firms like us. They provide us and you with access to its institutional brokerage services - trading, custody, reporting and other related services - many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer your accounts, while others help us manage and grow our business. Schwab's support services are available to us on an unsolicited basis and at no charge

to us as long as our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. Following is a more detailed description of Schwab's support services:

Services That Benefit You.

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you.

Services That May Not Directly Benefit You.

Schwab also makes available to us other products and services that benefit us but may not directly benefit you. These products and services assist us in managing and administering your accounts. They include investment research, both from Schwab and that of third parties. We may use this research to service all or a substantial number of our clients' accounts. In addition to investment research, Schwab also makes available software, including Schwablink and Portfolio Center, and other technology that:

- Provides access to client account data (such as duplicate trade confirmations and account statements)
- Facilitates trade execution and allocates aggregated trade orders for multiple client accounts
- Provides pricing and other market data
- Facilitates payment of our fees from our clients' accounts
- Assists with back-office functions, recordkeeping and client reporting

Services That Generally Benefit Only Us.

Schwab also offers other services intended to help us manage and further develop our business. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefit providers, human capital consultants and insurance providers

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab, or other third party vendors, may also provide us with other benefits, such as occasional business entertainment of our personnel or clients.

Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services so long as our clients collectively keep a total of at least \$10 million of their assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The \$10 million minimum gives us an incentive to

recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of you, our client. Our selection is primarily supported by the scope, quality, and price of Schwab's services and not Schwab's services that benefit only us. We do not believe that recommending our clients to collectively maintain at least \$10 million of assets at Schwab in order to avoid paying Schwab quarterly service fees of \$1,200 presents a material conflict of interest.

We do not refer clients to particular broker-dealers in exchange for client referrals from those broker-dealers. We do not recommend or require that clients direct their brokerage business to any particular broker-dealer.

On occasions when the Firm deems the purchase and sale of a security to be in the best interests of more than one of its clients, the Firm may aggregate multiple contemporaneous client purchase or sell orders into a block order for execution. Executed orders are allocated among participating accounts according to each account's pre-determined participation in the transaction. Clients' accounts for which orders are aggregated receive the average price of such transaction, which could be higher or lower than the price that would otherwise be paid by a client absent the aggregation. Any transaction costs incurred in the transaction will be assessed to each client based on each client's level of participation in the transaction.

If we make a trade error that results in a loss to a client, we will make the client whole. If we make a trade error that results in a gain to a client, and the gain can be attributed to a client, the client is entitled to keep the gain. If Bellwether Wealth makes a trade error that results in a gain to a client and the gain cannot be attributable to a particular client, Schwab, and not Bellwether Wealth, keeps the gain. In that case, if the gain is more than \$100, Schwab will donate the gain to charity. If the gain is less than \$100, Schwab will keep the gain to minimize and offset its administrative time and expense.

ITEM 13 – REVIEW OF ACCOUNTS

Your accounts are under continuous review by our investment professionals. Portfolio reviews are conducted frequently to judge the appropriateness of securities held in your account. Accounts are reviewed if there is an extraordinary event such as abnormal performance of a mutual fund or individual equity, if there is a change in a mutual fund manager or if there is a significant market swing. Clark Bellin, Marvin Brinkman, and Larry Freie review all accounts and are assigned all accounts under management. In addition to the monthly written statements that our clients receive from their custodian through the mail or via email, our clients receive quarterly, semiannual or annual reviews that include, but are not limited to, evaluation and review of securities currently held in an account, performance review and review of activity in the account since the last review.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients

maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above in Item 12. The availability to us of Schwab's products and services is not based on us giving particular investment advice to you, our client.

For accounts of our clients maintained in custody at Schwab, Schwab will not charge the client separately for custody but will receive compensation from our clients in the form of commissions or other transaction-related compensation on securities trades executed through Schwab. Schwab also will receive a fee (generally lower than the applicable commission on trades it executes) for clearance and settlement of trades executed through broker-dealers other than Schwab. Schwab's fees for trades executed at other broker-dealers are in addition to the other broker-dealer's fees. Thus, we have an incentive to cause trades to be executed through Schwab rather than another broker-dealer. We nevertheless, acknowledge our duty to seek best execution of trades in clients' accounts. Trades for client accounts held in custody at Schwab may be executed through a different broker-dealer than trades for our other clients.

We have entered into a solicitation agreement with Brian Beaulieu ("Brian"), an individual. We have agreed to pay Brian a portion of the advisory fee that we receive under the investment management agreement entered into by us and each client referred to us by Brian. We have also agreed not to charge costs greater than the fees or costs we charge our advisory clients who were not introduced to us by Brian, and who have similar portfolios under management with us.

We have entered into a solicitation agreement with Alan Beaulieu ("Alan"), an individual. We have agreed to pay Alan a portion of the advisory fee that we receive under the investment management agreement entered into by us and each client referred to us by Alan. We have also agreed not to charge costs greater than the fees or costs we charge our advisory clients who were not introduced to us by Alan, and who have similar portfolios under management with us.

In addition, we have agreed that if a client is generally referred by Institute for Trend Research (ITR) Economics, meaning that the client mentions that they have read ITR Economics' book, *Prosperity in the Age of Decline*, that Brian and Alan will receive a portion of the advisory fee that we receive under the investment management agreement entered into by us and each client referred to us in this method.

We have entered into a solicitation agreement with Greg Dynek ("Greg"), an individual. We have agreed to pay Greg a portion of the advisory fee that we receive under the investment management agreement entered into by us and each client referred to us by Greg. We have also agreed not to charge costs greater than the fees or costs we charge our advisory clients who were not introduced to us by Greg, and who have similar portfolios under management with us.

ITEM 15 – CUSTODY

We do not have physical custody of client assets as Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab monthly. The statements will be sent to the email or postal mailing address you provide to Schwab. You should carefully review those statements promptly when you receive them. We also urge you to compare

Schwab's account statements to the portfolio reports you receive from us. Clients may have standing letters of authorization on their accounts. We have reviewed those relationships and determined that they meet the IAA no action letter seven conditions and do not trigger the surprise custody audit.

ITEM 16 – INVESTMENT DISCRETION

Typically, we manage our accounts on a discretionary basis. This means that you give us full and complete discretion and authority with respect to the management of your assets, including the authority to purchase, sell, exchange, convert and trade your assets, and to choose broker-dealers. If you desire, you may impose restrictions on the securities or types of securities you would like us to invest in.

ITEM 17 – VOTING CLIENT SECURITIES

We do not accept authority to vote proxies on behalf of clients as a matter of policy. Clients will receive their proxy information directly from their custodian. Clients may contact the Adviser with questions about a particular solicitation by telephone at (402) 817-4504.

ITEM 18 – FINANCIAL INFORMATION

We do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. As an advisory firm that maintains discretionary authority for client accounts and is deemed to have custody of some assets, we are also required to disclose any financial condition that is reasonably likely to impair our ability to meet our contractual obligations. We have no additional financial circumstances to report.

We have received a loan through the U.S. Small Business Administration ("SBA") Paycheck Protection Program ("PPP"), which allowed eligible individuals and small businesses to obtain loans during the COVID-19 crisis. A PPP loan is eligible for forgiveness, provided the terms of the loan forgiveness are satisfied. We certified to the SBA that the receipt of the loan was necessary to support our ongoing operations. The SBA has subsequently advised all PPP borrowers that they were required to make this certification in good faith, taking into account their current business activity and their ability to access other sources of liquidity sufficient to support their ongoing operations in a manner that is not significantly detrimental to their business. We received a \$21,300 PPP loan to assist with the payment of salaries for our employees, including those who are primarily responsible for performing advisory functions for our clients. We believe that the PPP Loan was necessary to support our existing operations without layoffs or reductions of employee compensation. However, we do not believe we would have been unable to meet any contractual commitment absent our receipt of the PPP loan.

Confidentiality

Protecting client privacy is very important to us. We view protecting our clients' private information as a top priority. Pursuant to the requirements of the Gramm-Leach-Bliley Act, we have instituted policies and procedures to ensure that customer information is kept private and secure. We do not disclose any non-public personal information about its clients or former clients to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client

account, we may share some information with its service providers, such as, but not limited to, transfer agents, custodians, broker/dealers, accountants, and lawyers.

We restrict internal access to non-public personal information about our clients to those employees who need to know that information in order to provide products or services to the client. We maintain physical and procedural safeguards that comply with federal standards to guard a client's non-public personal information and ensure its integrity and confidentiality. As emphasized above, it has always been and will always be our policy never to sell information about current or former customers or their accounts to anyone. It is also our policy not to share information unless required to process a transaction, at the request of our customer, or as required by law.

A copy of our privacy policy notice will be provided to each client prior to, or contemporaneously with, the execution of the advisory agreement. Thereafter, we will deliver a copy of the current privacy policy notice to our clients prior to changing our sharing practices.



SCHEDULE 2B - BROCHURE SUPPLEMENT

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Lincoln, NE 68058**

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August 31, 2020

This Brochure Supplement provides information about Clark Bellin that supplements the Bellwether Advisors, LLC dba Bellwether Wealth ("Bellwether Wealth") brochure. You should have received a copy of that brochure. Please contact Clark Bellin at info@bellww.com if you did not receive the Bellwether Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Clark Bellin (CRD Number 2879015) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Clark Bellin

Year of birth: 1973

Educational Background and Business Experience:

Nebraska Wesleyan, Lincoln, Nebraska, BA Business Administration, 1996

Professional Designations:

Certified Exit Planning Advisor

Issued by: Exit Planning Institute

Prerequisites/Experience Required: Candidate must meet the following requirements:

Five-day educational program; Five years of full-time or equivalent experience working directly with business owners as a financial advisor, attorney, CPA, business broker, investment banker, commercial lender, estate planner, insurance professional, business consultant or in a related capacity; Exit Planning; and Institute member in good standing

Educational Requirements: Undergraduate degree from a qualifying institution; if no qualifying degree must submit additional professional work experience (two years of relevant professional experience may be substituted for each year of required undergraduate studies)

Examination Type: None

Continuing Education/Experience Requirements: 40 hours every three years

Certified Investment Management Consultant

Issued by: Investment Management Consultants Association

Prerequisites/Experience Required: Candidate must meet the following requirements: None

Educational Requirements: None

Examination Type: None

Continuing Education/Experience Requirements: 40 hours every two years

Certified Investment Management Analyst

Issued by: Investment Management Consultants Association

Prerequisites/Experience Required: Candidate must meet the following requirements:

Successful completion of prequalification exam, course of study, and background check

Must comply with code of ethics

Educational Requirements: None

Examination Type: final examination

Continuing Education/Experience Requirements: 40 hours every two years

Chartered Private Wealth Advisor

Issued by: Investment Management Consultants Association

Prerequisites/Experience Required: Candidate must meet the following requirements:

Successful completion of a combination of 6 month self-study and classroom course and exam program;

Five years relevant work experience; Meet minimum degree/credential/licensing requirements; Must comply with code of ethics

Educational Requirements: None

Examination Type: None

Continuing Education/Experience Requirements: 40 hours every two years

Business Experience:

Bellwether Advisors, LLC dba Bellwether Wealth, Lincoln, Nebraska, Investment Adviser Representative, 03/2019 - Present

PKS Investments, Albany, New York, Registered Representative, 03/2019 - Present

Kestra Financial Services, Inc., Austin, Texas, Registered Representative/Investment Adviser Representative 04/2016 – 03/2019
NFP Securities, Austin, Texas, Registered Representative, 09/2003 – 04/2016
Ameritas Life Insurance Corp, Lincoln, Nebraska, Associate, 06/2000 – 04/2016

Item 3 Disciplinary Information

There are no legal or disciplinary events that are related to the above listed supervised person.

ITEM 4 Other Business Activities

Registered Representative of PKS Investments

Clark Bellin is a Registered Representative of PKS Investments, a FINRA member broker-dealer. Clients may choose to engage Clark Bellin as a Registered Representative of PKS, to implement investment recommendations on a commission basis. Thus, a potential conflict of interest may exist between the interests of Mr. Bellin and those of the advisory clients. However, clients are under no obligation to act upon any recommendations of Mr. Bellin or affect any transactions through Mr. Bellin if they decide to follow the recommendations. The Investment Adviser Representative's PKS affiliation is an outside business activity and is not monitored, endorsed, or supervised by the Adviser.

Other Outside Business Activity

Bellin Inc.

Nature of Business: S-Corp

Hours spent on this activity per month: 1%-4% (113 – 128 hours)

Bellwether Wealth

Nature of Business: Registered Representative activities through PKS Investments using a DBA name

Hours spent on this activity per month: 71% - 80% (113 – 128 hours)

Clark Bellin

Nature of Business: Insurance

Hours spent on this activity per month: 21% - 30% (33 - 48 hours)

NAVIX

Nature of Business: Consulting

Hours spent on this activity per month: 11% - 20% (17 – 32 hours)

Insurance Statement

Advisors may also act as insurance agents independent from our firm. Some of our Advisors, in their individual capacities as insurance agents, may recommend you purchase fixed or general account insurance products or annuities on a commission basis. Although some of these insurance agencies may be affiliated with our firm, we are not responsible for sales and services conducted through these other companies. The recommendation to purchase a commission-based product presents a conflict of interest because commission amounts vary and Advisors may be incentivized to recommend products paying higher commissions.

Bellwether Wealth does not supervise and does not receive any compensation from these Other Outside Business Activity.

ITEM 5 Additional Compensation

Please see Item 4. Clark Bellin may offer a wide variety of securities products and financial services

through the firm. The commissions, fees and other forms of compensation paid to an Advisor in connection with the purchase or sale of products will be in addition to the fees paid by you for investment advice.

ITEM 6 Supervision

Clark Bellin, Chief Compliance Officer, is responsible for monitoring the activities of the Adviser's supervised persons. Mr. Bellin's telephone number is 402-817-4504. Mr. Bellin continuously reviews investment strategies and market conditions. Mr. Bellin supervises all Investment Adviser Representatives that conduct client contact. The Adviser has an Investment Adviser Supervisory Manual and Code of Ethics that are annually reviewed. Supervision for Clark Bellin is conducted by the Chief Compliance Officer Designee, who also reviews Mr. Bellin's personal securities transactions.



SCHEDULE 2B - BROCHURE SUPPLEMENT

**Marvin George Brinkman
140 North 8th Street Suite 210
Lincoln, NE 68058**

Telephone: 402-261-2570

website: www.bellww.com

August 31, 2020

This Brochure Supplement provides information about Marvin Brinkman that supplements the Bellwether Advisors, LLC dba Bellwether Wealth ("Bellwether Wealth") brochure. You should have received a copy of that brochure. Please contact Clark Bellin at info@bellww.com if you did not receive the Bellwether Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Marvin Brinkman (CRD Number 2992201) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Marvin Brinkman

Year of birth: 1961

Educational Background and Business Experience:

Luther Northwestern Theological Seminar, Saint Paul, Minnesota, MA Divinity, 1990

University of Nebraska, Lincoln, Nebraska, BA English, 1984

Professional Designations:

Retirement Income Certified Professional

Issued by: The American College

Prerequisites/Experience Required: Candidate must meet the following requirements:

Three years experience

Educational Requirements: None

Examination Type: None

Continuing Education/Experience Requirements: 15 hours every two years

Certified Financial Planner®

In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP® Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP® Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years.

See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements-sthash.qwXJz3yF.dpuf>.

Chartered Life Underwriter

Issued by: The American College

Prerequisites/Experience Required: Candidate must meet the following requirements:

Successful completion of a self-study course and examination program; three years of relevant work experience; and must comply with code of ethics

Educational Requirements: None

Examination Type: Final exam

Continuing Education/Experience Requirements: 30 hours every two years

Business Experience:

Bellwether Advisors, LLC dba Bellwether Wealth, Lincoln, Nebraska, Investment Adviser Representative, 03/2019 - Present

PKS Investments, Albany, New York, Registered Representative, 03/2019 - Present

Kestra Financial Services, Inc., Austin, Texas, Registered Representative/Investment Adviser Representative, 04/2016 – 03/2019

NFP Securities, Austin, Texas, Registered Representative, 10/2012 – 04/2016

MML Investors Services, Inc., Omaha, Nebraska, Registered Representative, 03/2009 – 10/2012

MassMutual Financial Group, Omaha, Nebraska, Agent, 03/2009 – 10/2012

Item 3 Disciplinary Information

There are no legal or disciplinary events that are related to the above listed supervised person.

ITEM 4 Other Business Activities

Registered Representative of PKS Investments

Marvin Brinkman is a Registered Representative of PKS Investments, a FINRA member broker-dealer. Clients may choose to engage Marvin Brinkman as a Registered Representative of PKS, to implement investment recommendations on a commission basis. Thus, a potential conflict of interest may exist between the interests of Mr. Brinkman and those of the advisory clients. However, clients are under no obligation to act upon any recommendations of Mr. Brinkman or affect any transactions through Mr. Brinkman if they decide to follow the recommendations. The Investment Adviser Representative's PKS affiliation is an outside business activity and is not monitored, endorsed, or supervised by the Adviser.

Other Outside Business Activity

Simple Rental Property 2

Nature of Business: Real Estate

Hours spent on this activity per month: 0% - 10% (0 – 16 hours)

Insurance Statement

Advisors may also act as insurance agents independent from our firm. Some of our Advisors, in their individual capacities as insurance agents, may recommend you purchase fixed or general account insurance products or annuities on a commission basis. Although some of these insurance agencies may be affiliated with our firm, we are not responsible for sales and services conducted through these other companies. The recommendation to purchase a commission-based product presents a conflict of interest because commission amounts vary and Advisors may be incentivized to recommend products paying higher commissions.

Bellwether Wealth does not supervise and does not receive any compensation from these Other Outside Business Activity.

Item 5 Additional Compensation

Please see Item 4. Marvin Brinkman may offer a wide variety of securities products and financial services through the firm. The commissions, fees and other forms of compensation paid to an Advisor in connection with the purchase or sale of products will be in addition to the fees paid by you for investment advice.

Item 6 Supervision

Clark Bellin, Chief Compliance Officer, is responsible for monitoring the activities of the Adviser's supervised persons. Mr. Bellin's telephone number is 402-817-4504. Mr. Bellin continuously reviews investment strategies and market conditions. Mr. Bellin supervises all Investment Adviser Representatives that conduct client contact. The Adviser has an Investment Adviser Supervisory Manual and Code of Ethics that are annually reviewed.



SCHEDULE 2B - BROCHURE SUPPLEMENT

**Larry Dean Freie
140 North 8th Street Suite 210
Lincoln, NE 68058**

Telephone: 402-817-4504

website: www.bellww.com

August 31, 2020

This Brochure Supplement provides information about Larry Freie that supplements the Bellwether Advisors, LLC dba Bellwether Wealth ("Bellwether Wealth") brochure. You should have received a copy of that brochure. Please contact Clark Bellin at info@bellww.com if you did not receive the Bellwether Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Larry Freie (CRD Number 1236742) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Larry Freie

Year of birth: 1949

Educational Background and Business Experience

Professional Designations:

Chartered Financial Consultant

Issued by: The American College

Prerequisites/Experience Required: Candidate must meet the following requirements:

Successful completion of a self-study course and examination program; three years of relevant work experience; and must comply with code of ethics.

Educational Requirements: None

Examination Type: Final exam

Continuing Education/Experience Requirements: 30 hours every two years

Chartered Life Underwriter

Issued by: The American College

Prerequisites/Experience Required: Candidate must meet the following requirements:

Successful completion of a self-study course and examination program; three years of relevant work experience; and must comply with code of ethics

Educational Requirements: None

Examination Type: Final exam

Continuing Education/Experience Requirements: 30 hours every two years

Business Experience:

Bellwether Advisors, LLC dba Bellwether Wealth, Lincoln, Nebraska, Investment Adviser Representative, 03/2019 - Present

Kestra Investment Services, LLC, Austin, Texas, Registered Representative/Investment Adviser Representative, 01/2017 – 03/2019

Sunset Financial Services, Kansas City, Missouri, Registered Representative, 12/2006 – 02/2014

Kansas City Life Insurance Co, Kansas City, Missouri, Insurance Agent, 08/2005 – 02/2014

Unico Midlands, LLC, Lincoln, Nebraska, Agent, 03/2014 – 01/2017

Midlands Financial Benefits, Lincoln, Nebraska, Salesman, 03/2014 – 01/2017

Ameritas Life Insurance Corp, Lincoln, Nebraska, Agent, 02/2014 – 01/2017

Ameritas Investment Corp, Lincoln, Nebraska, Registered Representative/Investment Advisor, 02/2014 – 01/2017

Item 3 Disciplinary Information

There are no legal or disciplinary events that are related to the above listed supervised person.

Item 4 Other Business Activities

Registered Representative of PKS Investments

Larry Freie is a Registered Representative of PKS Investments, a FINRA member broker-dealer. Clients may choose to engage Larry Freie as a Registered Representative of PKS, to implement investment recommendations on a commission basis. Thus, a potential conflict of interest may exist between the interests of Mr. Freie and those of the advisory clients. However, clients are under no obligation to act upon any recommendations of Mr. Freie or affect any transactions through Mr. Freie if they decide to follow the recommendations. The Investment Adviser Representative's PKS affiliation is an outside business activity and is not monitored, endorsed, or supervised by the Adviser.

Insurance Statement

Advisors may also act as insurance agents independent from our firm. Some of our Advisors, in their individual capacities as insurance agents, may recommend you purchase fixed or general account insurance products or annuities on a commission basis. Although some of these insurance agencies may be affiliated with our firm, we are not responsible for sales and services conducted through these other companies. The recommendation to purchase a commission-based product presents a conflict of interest because commission amounts vary and Advisors may be incentivized to recommend products paying higher commissions.

Item 5 Additional Compensation

Please see Item 4. Larry Freie may offer a wide variety of securities products and financial services through the firm. The commissions, fees and other forms of compensation paid to an Advisor in connection with the purchase or sale of products will be in addition to the fees paid by you for investment advice.

Item 6 Supervision

Clark Bellin, Chief Compliance Officer, is responsible for monitoring the activities of the Adviser's supervised persons. Mr. Bellin's telephone number is 402-817-4504. Mr. Bellin continuously reviews investment strategies and market conditions. Mr. Bellin supervises all Investment Adviser Representatives that conduct client contact. The Adviser has an Investment Adviser Supervisory Manual and Code of Ethics that are annually reviewed.



SCHEDULE 2B - BROCHURE SUPPLEMENT

**Alan Norman Beaulieu
140 North 8th Street Suite 210
Lincoln, NE 68058**

Telephone: 402-817-4504

website: www.bellww.com

August 31, 2020

This Brochure Supplement provides information about Alan Beaulieu that supplements the Bellwether Advisors, LLC dba Bellwether Wealth ("Adviser") brochure. You should have received a copy of that brochure. Please contact Clark Bellin at info@bellww.com if you did not receive the Bellwether Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Alan Beaulieu (CRD Number 5740382) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience**Alan Beaulieu**

Year of birth: 1956

Educational Background and Business Experience

NH College (nka Southern New Hampshire University), Manchester, New Hampshire, Bachelor's Degree, 1980; Louisiana Bible College, Arabi, Louisiana, Master's Degree, 2013; Louisiana Bible College, Arabi, Louisiana, PhD, 2015.

Mr. Beaulieu passed his securities license Series 65 in February 2010.

Business Experience:

Bellwether Advisors, LLC dba Bellwether Wealth, Lincoln, Nebraska, Investment Adviser Representative, 03/2019 - Present

Kestra Investment Services, LLC, Austin, Texas, Investment Adviser Representative, 04/2016 – 03/2019

Hardi, Columbus, OH, Chief Economist, 09/2009 – Present

National Association of Wholesaler-Distributors, Washington, DC, Senior Economic Advisor, 07/2009 – Present

Beaubros, LLC, Boscawen, NH, Managing Partner, 09/2008 – Present

Institute For Trend Research, Boscawen, NH, Principal and President, 10/1990 – Present

NFP Securities Inc., Manchester, NH, Registered Representative, 06/2014 – 04/2016

Item 3 Disciplinary Information

There are no legal or disciplinary events that are related to the above listed supervised person.

Item 4 Other Business Activities

Institute For Trend Research

Nature of Business: President/Economist

Hours spent on this activity per month: 50% (20 hours)

Item 5 Additional Compensation

Please see Items 2 and 4 for the list of other businesses that Alan Beaulieu is an employee/owner operator where he earns a salary, profit distribution, and/or bonus.

Item 6 Supervision

Clark Bellin, Chief Compliance Officer, is responsible for monitoring the activities of the Adviser's supervised persons. Mr. Bellin's telephone number is 402-817-4504. Mr. Bellin continuously reviews investment strategies and market conditions. Mr. Bellin supervises all Investment Adviser Representatives that conduct client contact. The Adviser has an Investment Adviser Supervisory Manual and Code of Ethics that are annually reviewed.



SCHEDULE 2B - BROCHURE SUPPLEMENT

**Brian Lucien Beaulieu
140 North 8th Street Suite 210
Lincoln, NE 68058**

Telephone: 402-817-4504

website: www.bellww.com

August 31, 2020

This Brochure Supplement provides information about Brian Beaulieu that supplements the Bellwether Advisors, LLC dba Bellwether Wealth ("Bellwether Wealth") brochure. You should have received a copy of that brochure. Please contact Clark Bellin at info@bellww.com if you did not receive the Bellwether Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Brian Beaulieu (CRD Number 5740383) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience**Brian Beaulieu**

Year of birth: 1956

Educational Background and Business Experience

NH College (nka Southern New Hampshire University), Manchester, New Hampshire, BS in Economics and Finance, 1979.

Mr. Beaulieu passed his securities license Series 65 in January 2010.

Business Experience:

Bellwether Advisors, LLC dba Bellwether Wealth, Lincoln, Nebraska, Investment Adviser Representative, 03/2019 – Present

Kestra Investment Services, LLC, Austin, Texas, Investment Adviser Representative, 04/2016 – 03/2019

ITR Capital Management, LLC, Boscawen, NH, Managing Director, 09/2009 – Present

Beaubros, LLC, Boscawen, NH, Managing Partner, 09/2008 – Present

Beauplace, LLC, Boscawen, NH, Managing Partner, 08/2008 – Present

Vistage International, San Diego, CA, Chief Economist, 01/2004 – Present

Institute For Trend Research, Boscawen, NH, CEO/Economist, 06/1987 – Present

NFP Securities Inc., Austin, TX, Registered Representative, 02/2014 – 04/2016

Institute For Trend Research, Boscawen, NH, Economist, 06/1982 – 06/1987

Item 3 Disciplinary Information

There are no legal or disciplinary events that are related to the above listed supervised person.

Item 4 Other Business Activities

Institute For Trend Research

Nature of Business: CEO/Economist

Hours spent on this activity per month: 50% (20 hours)

Item 5 Additional Compensation

Please see Items 2 and 4 for the list of other businesses that Brian Beaulieu is an employee/owner operator where he earns a salary, profit distribution, and/or bonus.

Item 6 Supervision

Clark Bellin, Chief Compliance Officer, is responsible for monitoring the activities of the Adviser's supervised persons. Mr. Bellin's telephone number is 402-817-4504. Mr. Bellin continuously reviews investment strategies and market conditions. Mr. Bellin supervises all Investment Adviser Representatives that conduct client contact. The Adviser has an Investment Adviser Supervisory Manual and Code of Ethics that are annually reviewed.



SCHEDULE 2B - BROCHURE SUPPLEMENT

**Gregory A Dynek
140 North 8th Street Suite 210
Lincoln, NE 68058**

Telephone: 402-817-4504

website: www.bellww.com

August 31, 2020

This Brochure Supplement provides information about Gregory Dynek that supplements the Bellwether Advisors, LLC dba Bellwether Wealth ("Bellwether Wealth") brochure. You should have received a copy of that brochure. Please contact Clark Bellin at info@bellww.com if you did not receive the Bellwether Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Gregory Dynek (CRD Number 4455026) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Gregory Dynek

Year of birth: 1966

Educational Background and Business Experience

University of Nebraska, Lincoln, Nebraska, BBA in Finance, 1988; University of Texas, Austin, Texas, MBA in Finance, 1990.

Professional Designations:

Mr. Dynek earned the Chartered Financial Analyst (CFA) designation in September 1995. The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 90,000 CFA charterholders working in 135 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 19 countries recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession. To learn more about the CFA charter, visit www.cfainstitute.org.

Business Experience:

Bellwether Advisors, LLC dba Bellwether Wealth, Lincoln, Nebraska, Investment Adviser Representative,

03/2019 - Present

Bluestem Fiber, LLC, Lincoln, NE, CEO, 01/2015 – Present

Kestra Investment Services, LLC, Austin, Texas, Investment Adviser Representative, 04/2016 – 03/2019

Prairie Ventures – Omaha, NE, Fund Manager, 08/2013 – 10/2014

Modern Residential Properties, Lincoln, NE, Managing Member, 05/2012 – 12/2014

Rogge Capital, LLC, Lincoln, NE, Analyst – 05/2000 – 04/2012

Prism Imaging, Inc, Austin, TX, Director and Owner, 07/1994 – 04/2002

Cambridge Advisors Inc, Omaha, NE, Investment Manager and Research Director, 05/1997 – 05/2000

Firstier Bank (Now US Bancorp), Lincoln, NE, Trust Investment Officer and Portfolio Manager, 06/1992 – 06/1994

Texas Commerce Bank (Now Chase Manhattan), Houston, TX, Trust Marketing Officer and Credit Analyst, 08/1990 – 05/1992

Item 3 Disciplinary Information

There are no legal or disciplinary events that are related to the above listed supervised person.

Item 4 Other Business Activities

Bluestem Fiber, LLC

Nature of Business: Owner and Director

Hours spent on this activity per month: 100% (40 hours)

Item 5 Additional Compensation

Please see Items 2 and 4 for the list of other businesses that Greg Dynek is an employee/owner operator where he earns a salary, profit distribution, and/or bonus.

Item 6 Supervision

Clark Bellin, Chief Compliance Officer, is responsible for monitoring the activities of the Adviser's supervised persons. Mr. Bellin's telephone number is 402-817-4504. Mr. Bellin continuously reviews investment strategies and market conditions. Mr. Bellin supervises all Investment Adviser Representatives that conduct client contact. The Adviser has an Investment Adviser Supervisory Manual and Code of Ethics that are annually reviewed.