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March 26, 2020

FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of Pinnacle Family Advisors, LLC. If you have any questions about the contents of this brochure, contact us at 417-886-6590. 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 about Pinnacle Family Advisors, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Pinnacle Family Advisors, LLC is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since the filing of our last annual updating amendment dated March 27, 2019, we have the following material changes:

1. As of 3/25/2020 we have liquidated the Pinnacle Dynamic Growth Fund
2. As of 3/27/ 2020 we have merged the Pinnacle Sherman Tactical Allocation Fund into the Pinnacle Sherman Multi Strategy Core Fund.
3. Pinnacle Sales and Distribution will also introduce and market unaffiliated investment company products

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Item 4 Advisory Business

Description of Services and Fees

Pinnacle Family Advisors is a registered investment adviser based in Springfield, Missouri. We are organized as a limited liability company under the laws of the State of Missouri. We have been providing investment advisory services since 2007. R. Sean McCurry, is our President, Managing Member, and is the largest shareholder of our firm. Currently, we offer the following investment advisory services, which are personalized to each individual client:

- Asset Management Services
- Family Office and Wealth Planning Services
- Mutual Fund Advisory Services
- Sub-advisory Services
- Selection of Other Advisers
- Pension Consulting Services
- Financial Planning and Consulting Services

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "we," "our" and "us" refer to Pinnacle Family Advisors and the words "you," "your" and "client" refer to you as either a client or prospective client of our firm. Also, you may see the term Associated Person or Investment Adviser Representative throughout this brochure. As used in this brochure, our Associated Persons or Investment Adviser Representatives are our firm's officers, employees, and all individuals providing investment advice on behalf of our firm.

Asset Management Services

We offer discretionary and, in limited cases, non-discretionary asset management services. Our investment advice is tailored to meet your needs and investment objectives. If you retain our firm for asset management services, we will meet with you to determine your investment objectives, risk tolerance, and other relevant information (the "suitability information") at the beginning of our advisory relationship. We will use the suitability information we gather to develop a strategy that enables us to give you continuous and focused investment advice and/or to make investments on your behalf. As part of our asset management services, we may customize an investment portfolio for you in accordance with your risk tolerance and investing objectives. Once we construct an investment portfolio for you, we will monitor your portfolio's performance on an ongoing basis, and will reallocate the portfolio as required by changes in market conditions and in your financial circumstances.

If you participate in our discretionary asset management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow our firm to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm, a power of attorney, or trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased for your account) by providing our firm with your restrictions and guidelines in writing. If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account.

As part of our portfolio management services, in addition to other types of investments (see disclosures below in this section), we may invest your assets according to one or more model portfolios developed by our firm or third party investment advisers. These models are designed for investors with varying degrees of risk tolerance ranging from a more aggressive investment

strategy to a more conservative investment approach. Clients whose assets are invested in model portfolios may not set restrictions on the specific holdings or allocations within the model, nor the types of securities that can be purchased in the model. Nonetheless, clients may impose restrictions on investing in certain securities or types of securities in their account. In such cases, this may prevent a client from investing in certain models that are managed by our firm.

Our fee for asset management services is based on a percentage of your assets we manage and is negotiable. Our maximum annual fee is 2.0%. Asset management fees are billed and payable quarterly in advance based on the value of your account on the last day of the previous quarter. If the asset management agreement is executed at any time other than the first day of a calendar quarter, our fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which you are a client.

At our discretion, we may combine the account values of family members living in the same household to determine the applicable advisory fee. For example, we may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts. Combining account values may increase the asset total, which may result in your paying a reduced advisory fee.

We will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when you have given our firm written authorization permitting the fees to be paid directly from your account. This authorization is contained within our discretionary investment management agreement. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy. We will also receive a duplicate copy of your account statements. In limited circumstances, we will send you an invoice for the payment of our advisory fee. Fees will be payable as invoiced in such cases.

You may terminate the asset management agreement within five days from the date of acceptance without penalty. After the five-day period, either you or our firm may terminate the asset management agreement upon written notice to the other party. You will incur a pro rata charge for services rendered prior to the termination of the agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

After the initial inception quarter, if assets are deposited to or withdrawn from an account after the inception of a quarter the Management Fee payable with respect to the assets will NOT be prorated based on the number of days remaining in the quarter.

We encourage you to reconcile any invoices you may receive from us with the statement(s) you receive from the qualified custodian. If you find any inconsistent information between our invoice and the statement, you receive from the qualified custodian please call our main office number located on the cover page of this brochure.

Family Office and Wealth Planning Services

We offer Family Office and Wealth Planning Services designed to help our clients organize their financial situation and plan for the successful transfer of wealth to the next generation. Such services generally include the following areas:

- Discretionary Asset Management
- Family Continuity
- Estate Planning and Trustee Oversight (not providing legal advice)
- Integrated Tax and Financial Planning (not providing tax advice)

- Lifestyle Management
- Family Philanthropy
- Risk Management

We charge an annual fixed fee ranging from approximately \$10,000 to \$600,000 which is payable quarterly in advance for Family Office and Wealth Planning Services based on the complexity of your financial situation. We do not have a minimum investment account size. Factors considered in setting the client fee include but are not limited to, number of household members, amount of financial planning/consulting required, number and type of accounts, net worth, life stage, business interests, real estate ownership, trust arrangements, etc. Clients who benefit from our fee structure tend to be people with higher net worth and/or complicated planning needs. Fees may be assessed pro rata in the event the agreed upon annual services commence subsequent to the first day of a calendar quarter. We will either invoice you directly for continuing services or payment of fees will be deducted by the qualified, independent custodian holding your funds and securities.

Fees may be negotiable and we reserve the right to decline situations which we consider not complicated enough to warrant our minimum fee. Alternatively, we may agree to negotiate a lower fee for such simpler situations.

Due to the detailed nature of the work we do for clients, our fees for Family Office and Wealth Planning Services depend on the scope and complexity of those services. As such, our fees may be lower or higher than those charged by other investment advisors for similar services. We may provide account services for members of current client households or their families. When we expect to provide short-term or one-off planning or account services, we may complete them without additional fees. In situations where we expect our services to be long-term and ongoing, we may include this complexity in setting the client fee.

You may terminate the family office and wealth planning services agreement upon written notice to our firm. You will incur a pro rata charge for services rendered prior to the termination of the agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

Mutual Fund Advisory Services

We serve as the investment adviser to the following registered investment companies (Mutual Funds").

Pinnacle Sherman Multi-Strategy Core Fund. The investment objective of Pinnacle Sherman Multi-Strategy Core Fund is to seek high total return with reasonable risk by investing, under normal market conditions, in exchange traded funds (ETFs) that may invest in all major asset classes, including, but not limited to, foreign and domestic (i) equity securities of all market capitalizations; (ii) fixed income securities of any credit quality; and (iii) cash. Pinnacle Sherman Multi-Strategy Core Fund intends to generally invest in a mix of asset classes. Pinnacle Sherman Multi-Strategy Core Fund may also invest in cash directly. The foreign securities held by the underlying ETFs may include those in emerging markets.

As investment adviser to Pinnacle Sherman Tactical Allocation Fund and Pinnacle Sherman Multi-Strategy Core Fund, we use signals that come from models developed by W.E. Sherman & Co. to determine each fund's allocations. The process for each fund and model is similar: (1) the expected market trend or indicator for specific securities over a period is examined; (2) if a particular asset class is determined to be in a positive trend based on rankings and/or model signals, the assets allocated to a particular model are invested in that asset class; and (3) if a particular asset class is determined to be in a negative trend based on rankings and/or model signals, the assets allocated to a particular

model are invested in another asset class as dictated by the applicable model. The funds actively trade their portfolio investments. We are compensated by each fund based on an annual rate of 1% of the average daily net assets of each fund. Effective 3/27/2020 the Pinnacle Sherman Tactical Allocation Fund was merged into the Pinnacle Sherman Multi-Strategy Core Fund.

Pinnacle TrendRating Innovative Equity Fund. Pinnacle TrendRating Innovative Equity Fund seeks high total return. Under normal market conditions, Pinnacle TrendRating Innovative Equity Fund invests at least 95% of its assets (plus the amount of borrowing, if any) in equity securities. Pinnacle TrendRating Innovative Equity Fund defines equity securities as common stock. Pinnacle TrendRating Innovative Equity Fund intends to invest in 25 of the 500 largest market capitalized common stocks, excluding ADRs, trading in the U.S. based on a rank given to each of these stocks by the Adviser every month. We rank each stock using the TrendRating Smart Momentum Score ("SMS"), a proprietary system of TrendRating S.A., which considers 8 out of over 350 factors that TrendRating's research has determined to be the most effective in capturing medium to long term price trends ranging from a few months (medium term) to a few quarters (long term).

The SMS measures the strength of a trend for a given stock. Each stock is given an SMS between -3.0 and +3.0, where a score of +2.0-+3.0 indicates a strong bull trend and a score of +1.0-+2.0 indicates the beginning of a bull trend, whereas a score of -1.0--2.0 indicates the inception of a bear trend and a score of -2.0--3.0 indicates a strong bear trend. Based on the scoring, Pinnacle TrendRating Innovative Equity Fund may be focused in certain sectors and industries. The importance of each factor to the SMS is adjusted on the last trading day of each month based on price patterns and volatility.

The 25 highest ranked stocks will make up the Pinnacle TrendRating Innovative Equity Fund's initial portfolio. All valid positions (stocks maintaining a positive SMS) remaining from previous months will maintain their allocation percentage up to 8% for any one stock, and any new holdings will be equally weighted among the percentage available from stocks being removed. Pinnacle TrendRating Innovative Equity Fund intends to be fully invested in 25 common stocks chosen through TrendRating's proprietary system. If there are not enough stocks with a positive SMS, Pinnacle TrendRating Innovative Equity Fund may hold some of its assets in cash.

We may recommend investments in the Funds for other advisory client accounts, including accounts for owners, officers, and investment adviser representatives associated with our firm. If you have engaged us for discretionary management services, we may invest a percentage of your assets in the Funds without further approval from you. Because we receive compensation from the Funds, we have a financial incentive to invest client assets in the Funds or to recommend that clients invest in the Funds. However, we will only make such investments and/or recommendations where we believe it is consistent with our fiduciary duty and your investment objectives. We will earn fees from the Funds and fees from you for investments made in the Funds. For ERISA assets invested in the Funds, the advisory fee on such assets will be offset by the amount of the management fee paid to us by the Funds. At our discretion, we may offset a portion of your advisory fee against the fees and expenses you may otherwise pay to the Funds.

You should refer to the prospectus for a complete description of the fees, investment objectives, risks and other relevant information associated with investing in the Funds. Refer to the *Investment Discretion* section below for additional disclosures on our discretionary authority to manage your investment account.

Securities held in separate accounts, including accounts for owners, officers, and other individuals associated with our firm may also be the same securities as those purchased by the Fund.

Sub-advisory Services

We offer sub-advisory services to unaffiliated third party investment advisers (the "Primary Investment Adviser"). As part of these services, we will manage assets delegated to our firm by the Primary Investment Adviser. While we are responsible for the overall management of the assets delegated to our firm, we will not communicate investment recommendations or selections directly to the Primary Investment Adviser's individual clients. Fees and payment arrangements are negotiable and will vary on a case-by-case basis.

Selection of Other Advisers

We may recommend that you utilize the services of a third party investment adviser ("TPA") to manage a portion of, or your entire portfolio. After gathering information about your financial situation and objectives, an associated person of our firm may recommend a TPA or investment program based on, but not limited to, performance, methods of analysis and fees of the TPA, your financial needs, investment goals, risk tolerance, and investment objectives. We will periodically monitor the performance of the TPA(s) to ensure their performance and investment style remains aligned with your investment goals and objectives.

The TPA(s) will actively manage your portfolio and will assume investment discretionary and trading authority over the managed account. We will assume discretionary authority to hire and fire TPA(s) and/or reallocate your assets to other TPA(s) where such action is deemed to be in your best interest.

Any fees paid by you to a TPA are separate and distinct from the fees you pay us. TPA fees are established and payable in accordance with the Form ADV Part 2 or other equivalent disclosure document provided by each TPA to whom we may refer you, such fees may or may not be negotiable and may differ depending on the individual TPA selected. These disclosures will be set forth in the disclosure documents of relevant TPAs. Our fees are calculated and payable in accordance with the previously stated terms of our Asset Management Services. Alternatively, we share in the advisory fees charged by some TPAs and we do not share in the advisory fees charged by other TPAs. Such compensation will differ depending upon the individual agreement we have with each TPA. As such, our firm or our Associated Persons may have an incentive to recommend one TPA over another TPA with whom we have less favorable compensation arrangements or other advisory programs offered by TPAs with which we have no compensation arrangements.

If you are referred to a TPA you will receive full disclosure, including services rendered, account minimums, and fee schedules, at the time of the referral by delivery of a copy of the TPA's relevant Form ADV Part 2 or equivalent disclosure document. Additionally, if the investment program recommended to you is a wrap fee program, you will also receive the Appendix 1 or equivalent wrap fee brochure provided by the sponsor of the program. Our firm or the TPA will provide you all appropriate disclosure statements. You will be required to sign a management agreement with our firm and may be required to sign a management agreement directly with TPAs. Under such arrangements, you, our firm, or the relevant TPA may terminate the advisory relationship in accordance with the relevant advisory agreement. If the TPA is compensated in advance, you will typically receive a pro rata refund of any prepaid advisory fees upon termination of an advisory agreement.

Pension Consulting Services

We offer pension consulting services to employee benefit plans and their fiduciaries based upon the needs of the plan and the services requested by the plan sponsor or named fiduciary. In general, these services may include an existing plan review and analysis, plan-level advice regarding fund selection and investment options, education services to plan participants, investment performance monitoring,

and/or ongoing consulting. These pension consulting services will generally be non-discretionary and advisory in nature. The ultimate decision to act on behalf of the plan shall remain with the plan sponsor or other named fiduciary.

We may also assist with participant enrollment meetings and provide investment-related educational seminars to plan participants on such topics as:

- Diversification
- Asset allocation
- Risk tolerance
- Time horizon

Our educational seminars may include other investment-related topics specific to the particular plan.

Our pension consulting services fees are negotiated on a case-by-case basis with you. The amount of the fees will be negotiated based on the scope and complexity of the plan and the requested services. Typically, fees will be based upon an agreed upon percentage of the plan assets. The fees and terms will be clearly defined in the pension consulting services agreement.

We may also provide additional types of pension consulting services to plans on an individually negotiated basis. All services, whether discussed above or customized for the plan based upon requirements from the plan fiduciaries (which may include additional plan-level or participant-level services) shall be detailed in a written agreement and be consistent with the parameters set forth in the plan documents. Our advisory fees for these customized services will be negotiated with the plan sponsor or named fiduciary on a case-by-case basis.

Our firm does not actively solicit plan participants for additional services/fees. However, participants may engage our firm for on-going individual advisory services under a separate agreement. In such cases, the services, fees, and terms of the engagement will be negotiable on a case-by-case basis and will be clearly defined in the services agreement executed between our firm and the plan participant prior to services being rendered.

You may terminate the pension consulting agreement within five days of acceptance without penalty. After the five-day period, either party may terminate the agreement upon written notice to the other party. The pension consulting fees will be prorated for the quarter in which the termination notice is given and any unearned fees will be refunded to you.

Financial Planning and Consulting Services

We offer broad-based, modular, and consultative financial planning services. Financial planning will typically involve providing a variety of advisory services to you regarding the management of your financial resources based upon an analysis of your individual needs. If you retain our firm for financial planning services, we will meet with you to gather information about your financial circumstances and objectives. During this process, we may also meet with your other professional advisers (financial, legal, real estate, tax, etc.) for a series of information gathering and/or implementation meetings. Once we specify those long-term objectives (both financial and non-financial), we will develop shorter-term, targeted objectives. Once we review and analyze the information you provide we will deliver a written plan to you, designed to help you achieve your stated financial goals and objectives.

Financial plans are based on your financial situation at the time we prepare the plan and on the financial information you provide. You must promptly notify us if your financial situation, goals, objectives, or needs change.

You are under no obligation to act on our financial planning recommendations. Should you choose to act on any of our recommendations, you are not obligated to implement the financial plan through any of our other investment advisory services. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm.

Our fees for financial planning/consulting services are charged as a fixed fee ranging between \$250 and \$10,000. Fees are negotiable based upon the complexity and scope of the plan, as well as your financial situation and objectives. An estimate of the total time/cost will be determined at the start of the advisory relationship. In limited circumstances, the time/cost could potentially exceed the initial estimate. In such cases, we will request that you approve the additional fees.

In limited circumstances, you may request advice on a single aspect regarding the management of your financial resources. In these cases, we offer financial plans/consulting in a targeted format and/or general consulting that address only those specific areas of interest or concern.

Typically, 50% of the estimated financial planning fees will be due in advance, with the remainder due upon presentation of the plan. However, other fee payment arrangements may be negotiated. For lengthy engagements, interim payments may be requested. Applicable fees, fee payment arrangements, and the terms of the engagement will be clearly in the financial planning agreement executed between our firm and you prior to services being rendered.

We will not require prepayment of a fee more than six months in advance and in excess of \$1,200 under any circumstances.

You may terminate the financial planning agreement within five days after the date of acceptance without penalty. After the five-day period, either you or our firm may terminate the financial planning agreement by providing written notice to the other party. You will incur a pro rata charge for services rendered prior to the termination of the agreement. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

Types of Investments

We may advise you on any type of investment that we deem appropriate based on your stated goals and objectives, including equities, exchange traded funds, ("ETFs"), mutual funds, and affiliated mutual funds for which we serve as investment adviser. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

You may request that we refrain from investing in particular securities or certain types of securities, including affiliated mutual funds for which we serve as investment adviser. You must provide these restrictions to our firm in writing.

Assets Under Management

As of December 31, 2019, we provide continuous management services for \$196,950,047 in client assets on a discretionary basis, and \$1,266,950 in client assets on a non-discretionary basis.

Item 5 Fees and Compensation

Please refer to the "Advisory Business" section in this brochure for information on our advisory fees, fee deduction arrangements, and refund policy according to each service we offer.

Additional Fees and Expenses

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, refer to the *Brokerage Practices* section of this brochure.

Persons providing investment advice to advisory clients on behalf of our firm may invest, select or recommend, and in many instances will invest, select or recommend, mutual fund investments in share classes that pay 12b-1 fees when clients are eligible to purchase share classes of the same funds that do not pay such fees and are less expensive. This presents a conflict of interest. You are under no obligation, contractually or otherwise, to purchase securities products through any person affiliated with our firm.

We may trade client accounts on margin. Each client must sign a separate margin agreement before margin is extended to that client account. Fees for advice and execution on these securities are based on the total asset value of the account, which includes the value of the securities purchased on margin. While a negative amount may show on a client's statement for the margined security as the result of a lower net market value, the amount of the fee is based on the absolute market value. This creates a conflict of interest where we have an incentive to encourage the use of margin to create a higher market value and therefore receive a higher fee. The use of margin may also result in interest charges in addition to all other fees and expenses associated with the security involved.

Compensation for the Sale of Securities or Other Investment Products

Persons providing investment advice on behalf of our firm are registered representatives with Purshe Kaplan Sterling Investments, a securities broker-dealer, and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. In their capacity as registered representatives, these persons receive compensation in connection with the purchase and sale of securities or other investment products, including asset-based sales charges, service fees or 12b-1 fees, for the sale or holding, of mutual funds. Compensation earned by these persons in their capacities as registered representatives is separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice to advisory clients on behalf of our firm who are registered representatives have an incentive to recommend investment products based on the compensation received rather than solely based on your needs. You are under no obligation, contractually or otherwise, to purchase securities products through any person affiliated with our firm who receives compensation described above.

Persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. You are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

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

We do not accept performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Our fees are calculated as described in the "Advisory Business" section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Item 7 Types of Clients

We offer investment advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, and other business entities. We are also the manager to two affiliated mutual funds.

In general, we do not require a minimum dollar amount to open and maintain an advisory account; however, we have the right to terminate your account if it falls below a minimum size, which, in our sole opinion, is too small to effectively manage.

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

Our Methods of Analysis and Investment Strategies

We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

- **Technical Analysis** - involves studying past price patterns, trends and interrelationships in the financial markets to assess risk-adjusted performance and predict the direction of both the overall market and specific securities.

Risk: The risk of market timing based on technical analysis is that our analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

- **Fundamental Analysis** - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company and its industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

Risk: The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

- **Long-Term Purchases** - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Risk: Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.

- **Short-Term Purchases** - securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

Risk: Using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short-term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. There are many factors that can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of times.

We may use short-term trading (in general, selling securities within 30 days of purchasing the same securities) as an investment strategy when managing your account(s). We may use this strategy when we determine that it is suitable given your stated investment objectives and tolerance for risk. Frequent trading can, in some cases, negatively affect investment performance, particularly through increased brokerage and other transactional costs and taxes.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio.

If we select a third party advisor (TPA) for you, we will not perform quantitative or qualitative analysis of individual securities. Instead, we will advise you on how to allocate your assets among various classes of securities through TPAs. We primarily rely on investment model portfolios and strategies developed by the TPAs and their portfolio managers. We may replace a TPA if there is a significant deviation in characteristics or performance from the stated strategy and/or benchmark.

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Moreover, as a result of revised IRS regulations, custodians and broker-dealers will begin reporting the cost basis of equities acquired in client accounts on or after January 1, 2011. Your custodian will default to the FIFO (First-In First-Out) accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, please provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Please note that decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Recommendation of Particular Types of Securities

We primarily recommend stocks, ETF's, and mutual funds. However, we may advise on other types of investments as appropriate for you since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with the investment.

Stocks: There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and, the overall health of the economy. In general, larger, better established companies ("large cap") tend to be safer than smaller start-up companies ("small cap") are but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

Mutual Funds and Exchange Traded Funds: Mutual funds and exchange traded funds ("ETF") are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. ETFs differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

ETFs may have tracking error risks. For example, the ETF investment adviser may not be able to cause the ETF's performance to match that of its Underlying Index or other benchmark, which may negatively affect the ETF's performance. In addition, for leveraged and inverse ETFs that seek to track the performance of their Underlying Indices or benchmarks on a daily basis, mathematical compounding may prevent the ETF from correlating with performance of its benchmark. In addition, an ETF may not have investment exposure to all of the securities included in its Underlying Index, or its weighting of investment exposure to such securities may vary from that of the Underlying Index. Some ETFs may invest in securities or financial instruments that are not included in the Underlying Index, but which are expected to yield similar performance.

Item 9 Disciplinary Information

Our firm has been registered and providing investment advisory services since 2007. Neither our firm nor any of our Associated Persons has any reportable disciplinary information.

Item 10 Other Financial Industry Activities and Affiliations

Registrations with Broker-Dealer

Persons providing investment advice on behalf of our firm may be registered representatives with Purshe Kaplan Sterling Investments ("PKS"), an unaffiliated securities broker-dealer, and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. These persons will earn commission-based compensation for selling securities products, including securities they sell to you. The commissions earned by these persons are separate from our advisory fees. Please see the "Fees and Compensation" section in this brochure for more information on the compensation received by registered representatives who are affiliated with our firm.

Licensed Insurance Agents

Persons providing investment advice on behalf of our firm may be licensed as insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate from our advisory fees. Please see the "Fees and Compensation" section in this brochure for more information on the compensation received by insurance agents who are affiliated with our firm.

Arrangements with Affiliated Entities

Business Consulting

We also offer general Business Consulting Services. These services may include, but are not limited to, estate, business and tax planning, risk management, business planning, mergers and acquisition advice, among others. When applicable, we may recommend these services to you. These services are offered on a stand-alone basis for a fee that is separate and distinct from the advisory services and fees. However, you are under no obligation to use our firm for these services.

Lawyers and Real Estate Brokers

Timothy O'Reilly and Thomas Rankin are minority members of our firm and share in the profits and their participation is limited to partial minority membership. They do not provide advisory services, solicit advisory clients, or participate in the day-to-day activities of our firm. Mr. O'Reilly is an attorney with O'Reilly & Preston, LLC. Mr. Rankin is a real estate broker with Sperry Van Ness/Rankin Company, LLC. Our firm's clients are not solicited or obligated to use any of the non-investment related professional services of our firm's associated persons.

Accountants

Janet Hudson and Brian McCracken, both investment adviser representatives of our firm, and Dan Wiser, an employee of our firm, are practicing CPAs working with Pinnacle Consulting CPAs. Pinnacle Consulting CPAs offers general accounting, tax preparation, tax planning, and general business consulting services. The services offered by Ms. Hudson, Mr. McCracken, or Mr. Wiser through Pinnacle Consulting CPAs and the relevant fees are separate and distinct from advisory services offered by our firm. When applicable, we may recommend the services offered by Ms. Hudson, Mr. McCracken and Mr. Wiser, through Pinnacle Consulting CPAs to you; however, you are under no obligation to use Ms. Hudson, Mr. McCracken, Mr. Wiser, or Pinnacle Consulting CPAs.

Affiliated Investment Company Securities (Mutual Funds)

We act as the investment adviser to affiliated investment companies (mutual funds), the Pinnacle Sherman Multi-Strategy Core Fund and the Pinnacle TrendRating Innovative Equity Fund, (the Funds). Certain related persons of our firm, including owners, officers, and investment adviser representatives of our firm, also serve in the same or a similar capacity for the Funds. The compensation of these related persons may be based, in part, upon the profitability of the other affiliated entities. Refer to the *Advisory Business* section above for additional disclosures on this topic. You should refer to the prospectus for a complete description of fees, investment objectives, risks and other relevant information associated with investing in the Funds. Refer to the *Investment Discretion* section below for additional disclosures on our discretionary authority to manage your investment account.

Certain of our Associated Persons, including executive officers of our firm, serve in a control capacity for the Funds. The compensation of these Associated Persons may be based, in part, upon the profitability of the Funds. Our relationship to the Funds may involve sharing or joint compensation, or separate compensation, subject to proper disclosures and the requirements of applicable law.

Pinnacle Management Advisors, LLC

We are affiliated with Pinnacle Management Advisors, LLC (PMA) through common control and ownership. This limited liability company was created to raise capital to cover the costs associated with setting up Pinnacle Sherman Tactical Allocation Fund, an affiliated registered investment company (mutual fund). We have executed a management agreement with PMA whereby PMA provides our firm with management, consulting, administrative, human resources, clerical and other back office support services related to the Fund. In the past clients of our firm have been solicited to invest in Pinnacle Management Advisors, LLC. However, we are not soliciting new investors to Pinnacle Management Advisors, LLC. In addition to persons associated with our firm, including owners and officers of our firm, advisory clients of our firm are also members/investors in Pinnacle Management Advisors, LLC. Members/investors in Pinnacle Management Advisors, LLC would have benefited by net profits derived from the management of Pinnacle Sherman Tactical Allocation Fund. Therefore, persons associated with our firm would have had a financial incentive to recommend or to invest a portion of your assets in Pinnacle Sherman Tactical Allocation Fund. Pinnacle Sherman Tactical Allocation Fund merged into the Pinnacle Sherman Multi Strategy Core Fund effective 3/27/2020. Pinnacle Management Advisors, LLC still maintains a management agreement with us to provide services. Members/investors in PMA will now benefit from net profits derived from the management of Pinnacle Sherman Multi Strategy Core Fund, though to a lesser extent than previously under the Pinnacle Sherman Tactical Allocation Fund. Therefore, persons associated with our firm have a financial incentive to recommend or to invest a portion of your assets in Pinnacle Sherman Multi Strategy Core Fund.

Pinnacle Management - Austin, LLC

We are affiliated with Pinnacle Management - Austin, LLC through common control and ownership. This limited liability company was created in 2011 to provide working capital to cover costs associated with marketing Pinnacle Family Advisors, LLC in Texas.

Pinnacle Sales and Distribution, LLC

We are affiliated with Pinnacle Sales and Distribution, LLC, through common control and ownership, whose business is to market the firm's affiliated mutual funds using wholesalers that are associated with our firm and registered representatives of unaffiliated registered broker-dealers. Pinnacle Sales and Distribution will also introduce and market unaffiliated investment company products.

The referral arrangements we have with some of our affiliated entities present a conflict of interest because we may have a financial incentive to recommend our affiliates' services. You may obtain comparable services and/or lower fees through other firms. As previously disclosed, we may use, suggest, or recommend the services of or recommend investment in some of our affiliated entities listed above. Such arrangements may involve sharing or joint compensation, or separate compensation, subject to proper disclosures and the requirements of applicable law.

Recommendation of Other Advisers

We may recommend that you use a third party adviser ("TPA") based on your needs and suitability. We may receive compensation from the TPA for recommending that you use their services. These compensation arrangements present a conflict of interest because we have a financial incentive to recommend the services of the third party adviser. You are not obligated, contractually or otherwise, to use the services of any TPA we recommend.

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

Description of Our Code of Ethics

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our Associated Persons are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

Participation or Interest in Client Transactions

Mr. Timothy O'Reilly is a minority owner of our firm with an 8.9% ownership equity in our firm. Mr. O'Reilly is related to the founders of O'Reilly Automotive, Inc., a publically traded stock ("ORLY"). Mr. O'Reilly and other members of his family are clients of our firm. In addition to Mr. O'Reilly and his family members being invested in ORLY stock, we may recommend investments in ORLY to other clients of the firm. Although Mr. O'Reilly has no involvement in investment selection nor in the day-to-day running of our firm, his ownership interest creates a conflict of interest because he would benefit from our clients investing in ORLY.

We act as the investment adviser to publically traded mutual funds ("Funds"). Where appropriate, we will exercise our discretionary authority and without further approval from you, we will invest a percentage of your assets in the Funds. This creates a conflict of interest because we will receive compensation as your investment adviser and as the investment adviser to the Funds. Additionally, individuals associated with our firm may buy or sell - for their personal account(s) - investment products identical to those purchased by the Funds. This practice may create a conflict of interest because we have the ability to trade ahead of the Funds and potentially receive more favorable prices than the Funds will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor our Associated Persons shall have priority over the Funds in the purchase or sale of securities.

Personal Trading Practices

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our associated persons nor we shall have priority over your account in the purchase or sale of securities.

Block Trading

Our firm or persons associated with our firm may buy or sell securities for you at the same time we or persons associated with our firm buy or sell such securities for our own account. We may also combine our orders to purchase securities with your orders to purchase securities ("block trading"). Refer to the *Brokerage Practices* section in this brochure for information on our block trading practices.

A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

Item 12 Brokerage Practices

Our firm primarily recommends the brokerage services of Fidelity Investments or Charles Schwab, both of which are unaffiliated securities broker-dealers. (See the "Directed Brokerage" section below for more information.) However, in certain instances, our firm may recommend the brokerage and custodial services of other independent and unaffiliated registered broker/dealer, such as Gemini Fund Services, among others.

While you are free to choose any broker-dealer or other service provider, we recommend that you establish an account with a brokerage firm with which we have an existing relationship. Such relationships may include benefits provided to our firm, including but not limited to, research, market information, and administrative services that help our firm manage your account(s). We believe that recommended broker-dealers provide quality execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by recommended broker-dealers, including the value of research provided, the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm.

The research, other products or services are not provided to us in connection with specific client securities transactions and are not considered to be paid for with so-called "soft dollar" credits. However, the research, other products or services received benefit us because we do not pay for those benefits. Such benefits are provided free of charge to us and other registered investment adviser's utilizing the custodial and brokerage services offered by recommended broker-dealers. In recognition of the value of research services and additional brokerage products and services recommended broker-dealers provide, you may pay higher commissions and/or trading costs than those that may be available elsewhere. Therefore, you should be aware that the receipt of economic benefits by our firm is a perceived conflict of interest as we may have an economic incentive to recommend a broker-dealer based on our interest in receiving research or other products or services, rather than based solely on your interest in receiving most favorable execution costs.

Fidelity and Schwab - Your Custody and Brokerage Costs

Our client accounts are primarily custodied at Fidelity or Schwab. Fidelity & Schwab generally do not charge you separately for custody services but are compensated by charging you commissions or other fees on trades that they execute or that settle into your account. These fees are in addition to the advisory fee charged by us to manage your account. However, we do not receive any of the trade fees charged by Fidelity or Schwab.

Directed Brokerage

Persons providing investment advice on behalf of our firm who are registered representatives of Purshe Kaplan Sterling Investments will recommend Purshe Kaplan Sterling Investments to you for brokerage services. These individuals are subject to applicable rules that restrict them from conducting securities transactions away from Purshe Kaplan Sterling Investments unless Purshe Kaplan Sterling Investments provides the representative with written authorization to do so. Therefore, these individuals are generally limited to conducting securities transactions through Purshe Kaplan Sterling Investments. It may be the case that Purshe Kaplan Sterling Investments charges higher transactions costs and/or custodial fees than another broker charges for the same types of services. If transactions are executed through Purshe Kaplan Sterling Investments, these individuals (in their separate capacities as registered representatives of Purshe Kaplan Sterling Investments) may earn commission-based compensation as result of placing the recommended securities transactions through Purshe Kaplan Sterling Investments. This practice presents a conflict of interest because these registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on your needs. You may utilize the broker-dealer of your choice and have no obligation to purchase or sell securities through such brokers we recommend. However, if you do not use Purshe Kaplan Sterling Investments, we may not be able to accept your account. See the *Fees and Compensation* section in this brochure for more information on the compensation received by registered representatives who are affiliated with our firm.

In limited circumstances, and at our discretion, some clients may instruct our firm to use one or more particular brokers for the transactions in their accounts. If you choose to direct our firm to use a particular broker, you should understand that this might prevent our firm from aggregating trades with other client accounts or from effectively negotiating brokerage commissions on your behalf. This practice may also prevent our firm from obtaining favorable net price and execution. Thus, when directing brokerage business, you should consider whether the commission expenses, execution, clearance, and settlement capabilities that you will obtain through your broker are adequately favorable in comparison to those that we would otherwise obtain for you.

Research and Other Benefits

Research products and services our firm may receive from brokers or custodians, may include financial publications, information about particular companies and industries, research software, the ability to have advisory fees deducted directly from our clients' account, and other products or services that provide lawful and appropriate assistance in our firm's investment decision-making responsibilities. Such research products and services are provided to all investment advisers utilizing these firms, and are not considered to be paid for with soft dollars. Moreover, the benefits received by our firm, or its related persons, do not depend on the amount of brokerage transactions directed to these firms.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Block Trades

We may combine multiple orders for shares of the same securities purchased for discretionary accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion regarding factual and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

We do not combine orders for non-discretionary accounts. Accordingly, non-discretionary accounts may pay different costs than discretionary accounts pay. If you enter into non-discretionary arrangements with our firm, we may not be able to buy and sell the same quantities of securities for you and you may pay higher commissions, fees, and/or transaction costs than clients who enter into discretionary arrangements with our firm.

Item 13 Review of Accounts

Paul Carroll, Chief Compliance Officer of Pinnacle Family Advisors, will supervise the overall review process. The Associated Person responsible for your account will monitor the account on a continuous basis and will conduct account reviews on a quarterly basis. Triggering factors that may stimulate additional reviews of your account include, but are not limited to, contributions and withdrawals, year-end tax planning, market moving events, security specific events and a change in your risk/return objective. You will receive statements directly from account custodians. If available, such information may be accessed electronically.

Item 14 Client Referrals and Other Compensation

Please refer to the "Brokerage Practices" section above for disclosures on research and other benefits we may receive resulting from our relationship with broker-dealers or custodians.

As disclosed under the "Fees and Compensation" section in this brochure, persons providing investment advice on behalf of our firm may be independent licensed insurance agents and/or registered representatives with PKS. For information on the conflicts of interest this presents, and how we address these conflicts, please refer to the "Fees and Compensation" section.

We may directly compensate non-employee (outside) individuals and/or entities (Solicitors) for client referrals. In order to receive a cash referral fee from our firm, Solicitors must comply with the requirements of the jurisdictions in which they operate. If you were referred to our firm by a Solicitor, you should have received a copy of this brochure along with the Solicitor's disclosure statement at the time of the referral. If you become a client, the Solicitor that referred you to our firm will receive a percentage of the advisory fee you pay our firm for as long as you are a client with our firm, or until such time as our agreement with the Solicitor expires or a one-time, flat referral fee upon your signing an advisory agreement with our firm. You will not pay additional fees because of this referral arrangement. Referral fees paid to a Solicitor are contingent upon your entering into an advisory agreement with our firm. Therefore, a Solicitor has a financial incentive to recommend our firm to you for advisory services. This creates a conflict of interest; however, you are not obligated to retain our firm for advisory services. Comparable services and/or lower fees may be available through other firms.

We will enter into contractual arrangements with an employee of our firm, under which the individual receives compensation from our firm for the establishment of new client relationships. Employees who refer clients to our firm must comply with the requirements of the jurisdictions where they operate. The compensation is a percentage of the advisory fee you pay our firm for as long as you are a client with our firm, or until such time as our agreement with the Solicitor expires. You will not be charged additional fees based on this compensation arrangement. Incentive based compensation is contingent upon you entering into an advisory agreement with our firm. Therefore, the individual has a financial incentive to recommend our firm to you for advisory services. This creates a conflict of interest; however, you are not obligated to retain our firm for advisory services. Comparable services and/or lower fees may be available through other firms.

Solicitors that refer business to more than one investment adviser may have a financial incentive to recommend advisers with more favorable compensation arrangements. We recommend that you request Solicitors to disclose to you whether multiple referral relationships exist and whether comparable services may be available from other advisers for lower fees and/or where the Solicitor's compensation is less favorable.

Item 15 Custody

"Custody" means holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them. An adviser has custody if it or a related person or entity holds, directly or indirectly client funds or securities, or has any authority to obtain possession of them, in connection with advisory services provided to clients. A related person is a person or entity directly or indirectly controlling or controlled by the adviser and any person or entity under common control with the adviser.

Your funds and securities will be held with a bank, broker/dealer, or other independent, qualified custodian. As paying agent for our firm, your independent custodian will directly debit your accounts for the payment of our advisory fees. Although we do not take physical possession of your funds or securities, the ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. If you are an investor in Pinnacle Management Advisors, LLC, we may have access to certain funds and securities held in your accounts by the independent, qualified custodian; therefore, we may be considered to have custody of your assets to the extent they are invested in such entities.

You will receive account statements from the independent, qualified custodians holding your funds and securities at least quarterly. The account statements from your independent, qualified custodians will show the assets in your account and indicate the amount of our advisory fees deducted from your accounts each billing period. You should carefully review account statements for accuracy.

You should compare any statements you may receive from us with the statements from your account custodians to reconcile the information reflected on each statement. If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact us directly at the telephone number on the cover page of this brochure.

Asset Transfer Authority

Our firm or persons associated with our firm may effect third party asset transfers for client accounts without client written consent per transaction, based upon previous written client authorization, to the custodian, for the specific clients' accounts. An adviser with authority to conduct third party asset transfers has access to the client's assets, and therefore has custody of the clients' assets in any related accounts.

Item 16 Investment Discretion

Before we can buy or sell securities on your behalf, you must first sign our discretionary management agreement and/or trading authorization forms.

You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Please refer to the "Advisory Business" section in this brochure for more information on our discretionary management services.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s). You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

Item 17 Voting Client Securities

Proxy Voting

In the event you wish to direct our firm on voting a particular proxy, you should contact Paul Carroll, Chief Compliance Officer, at (417) 886-6590 with your instruction.

As a general rule, we will vote proxies along the advice given by the board of directors of each company. The reasoning here is consistent with our overarching investment philosophy, which is stated under the Portfolio Management section of this document. We do NOT adhere to modern portfolio theory. Rather, we believe in technical analysis and that fundamental analysts will not, on a consistent basis, be able to uncover information that is not already being reflected in the price of the stock. Therefore, it is our belief, that it is best to follow the recommendation of the current board as they should know what is best for the company. Ultimately, the market price of the stock will indicate whether the company is making wise decisions or not. Instead of focusing our efforts on trying to obtain as much information as the current board, which we believe can't be done consistently, we will focus our efforts on monitoring the price action and technical indicators (moving averages, return, volatility, etc.) of the investments we follow and monitor. When we do NOT vote in accordance with the board of directors, we will document the reasons for this decision and this documentation will be kept with the documentation on how the proxy was voted.

Conflicts of interest between you and our firm, or a principal of our firm, regarding certain proxy issues could arise. If we determine that a material conflict of interest exists, we will take the necessary steps to resolve the conflict before voting the proxies. For example, we may disclose the existence and nature of the conflict to you, and seek direction from you as to how to vote on a particular issue; we may abstain from voting, particularly if there are conflicting interests for you (for example, where your account(s) hold different securities in a competitive merger situation); or, we will take other necessary steps designed to ensure that a decision to vote is in your best interest and was not the product of the conflict.

We keep certain records required by applicable law in connection with our proxy voting activities. You may obtain information on how we voted proxies and/or obtain a full copy of our proxy voting policies and procedures by making a written or oral request to our firm.

Proxy Voting Specific to Mutual Funds

We serve as investment adviser to certain investment companies under the Northern Lights Fund Trust III. These funds invest in other investment companies that are not affiliated ("Underlying Funds") and are required by the Investment Company Act of 1940, as amended (the "1940 Act") to handle proxies received from Underlying Funds in a certain manner. Notwithstanding the guidelines provided in these procedures, it is our policy to vote all proxies received from the Underlying Funds in the same proportion that all shares of the Underlying Funds are voted, or in accordance with instructions received from fund shareholders, pursuant to Section 12(d)(1)(F) of the 1940 Act. After properly voted, the proxy materials are placed in a file maintained by the Chief Compliance Officer for future reference.

Item 18 Financial Information

Our firm does not have any financial conditions or impairments that would prevent us from meeting our contractual commitments to you. We do not require the prepayment of more than \$1,200 in fees per client, six or more months in advance.

Item 19 Requirements for State Registered Advisers

Our firm is required to be federally registered; therefore, this section is not applicable.

Item 20 Additional Information

Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants (including portfolio and contact management systems), and attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, the trade error will be corrected in the trade error account of the executing broker-dealer and you will not keep the profit.

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.