
Item 1 – Cover Page

Alexander Beard (USA) Inc.

**Form ADV Part 2 Brochure
[February 23, 2021]**

Alexander Beard (USA) Inc.

14/16 Rossmore Business Village, Inward Way.

Ellesmere Port, Cheshire CH64 6QW

650-684-0450

www.abg-usa.net

This Brochure provides information about the qualifications and business practices of Alexander Beard (USA) Inc. (“AB USA”). If you have any questions about the contents of this Brochure or would like a free copy, please contact Melissa Eugenio at 650-684-0450 or Melissa.Eugenio@abg-usa.net.

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.

Alexander Beard (USA) Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about Alexander Beard (USA) Inc. (CRD# 134642) also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

Alexander Beard (USA) Inc. (AB USA) is a registered Investment Adviser with the Securities and Exchange Commission (“SEC”).

This brochure, dated 2/23/2021, is our new disclosure document (Form ADV Part 2A) provided to clients and prospective clients in this format.

After our initial filing of this Brochure, this section will be used to provide our clients with a summary of new and/or updated information.

Consistent with the new rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 90 days of the close of our business’ fiscal year.

Material Changes (since last update on 1/19/2021):

No changes to disclose.

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Item 4 – Advisory Business

Alexander Beard (USA) Inc. (AB USA) is an investment adviser providing financial planning and portfolio management services to individuals, high net worth individuals, pension plan sponsors, 401(k) and profit-sharing plan sponsors, corporations, and other businesses. AB-USA specializes in assisting expatriates in transferring and managing their pension funds.

AB USA's goal is to help its clients invest their assets in the market and to develop portfolios that are customized to the client's risk tolerance and investment time horizon.

Alexander Beard (USA) Inc. (AB USA) was formed in 2020 as a C-corporation. Alexander Beard (USA) Inc. (AB USA) has provided advisory services, including asset management primarily to expatriates from the United Kingdom since 2016.

Ownership:

- Alexander Beard Group of Companies, LTD: 100% ownership.
- Mr. Paul Beard, Member: 20% of ownership.

Type of Service

AB USA offers asset and portfolio management services.

Asset Management/Portfolio Management: AB USA offers asset and portfolio management services. Our firm gathers information about its clients through personal consultations and documents that are completed by the client, including a Risk Tolerance Questionnaire.

Portfolio Management

AB USA conducts an in-depth analysis of each client's financial situation, investment objectives, risk tolerance, and time horizon. Based on this information, AB USA creates an Investment Policy Statement for each client, which outlines the client's current situation and determines an appropriate portfolio based on the specific investment objectives of the client. The asset allocation and types of securities varies among the portfolios. The portfolios generally contain no-load mutual funds and/or ETFs; however, a portfolio may include other types of investments.

AB USA may also recommend any other products which it determines are appropriate in order to address the individualized needs, goals, and objectives of the client.

As of March 9, 2021, Alexander Beard (USA) Inc. manages \$39,000,000 on a discretionary basis and \$0 on a nondiscretionary basis.

Financial Planning

The Standards of Professional Conduct (Standards) define financial planning as “the process of determining whether and how an individual can meet life goals through the proper management of financial resources. Financial planning integrates the financial planning process with the financial planning subject areas.”

There are six steps to the financial planning process:

1. Establishing and defining the client-planner relationship
2. Gathering client data including goals
3. Analyzing and evaluating the client’s current financial status
4. Developing and presenting recommendations and/or alternatives
5. Implementing the recommendations
6. Monitoring the recommendations

“Financial planning subject areas” denotes the basic subject fields covered in the financial planning process which typically include, but are not limited to:

Financial statement preparation and analysis (including cash flow analysis/planning and budgeting)

- Insurance planning and risk management
- Employee benefits planning
- Investment planning
- Income tax planning
- Retirement planning
- Estate planning

Clients may impose restrictions on investing in certain securities types. As warranted, any restrictions will be disclosed on the client’s investment management, financial planning agreements, and/or investment policy statements.

UK Pension Transfer Services (AMVEST)

AB-USA provides clients with the ability to manage their UK-based pension assets in the United States.

How it works

AB USA developed a program, AMVEST, to help make moving to the US simpler and easier. AMVEST allows you to keep the benefits of your UK pension, whilst mitigating the risks of US tax implications.

AMVEST keeps your pension under UK rules but the funds may be invested in a multi-currency accounts (Pound Sterling (“GBP”) or US Dollars (“USD”), managed by US and UK fund managers and administered by our US office, who may also provide investment advice to clients.

When the time comes to take your pension, you benefit from the UK tax free lump sum, but can take this and other payments in US dollars. Income can be drawn in-line with UK drawdown rules or you can use the rest of your pension to purchase a US dollar annuity. We do not foresee any other conflicts to disclose from these arrangements.

Item 5 – Fees and Compensation

Portfolio Management fees:

Our typical fee schedule applicable as is as follows:

Client Assets	Annual Fee (%) for all assets
On the first \$250,000	1.50%
On the next \$250,001 – 500,000	1.25%
On the next \$500,001 – or more	.75%

Financial Planning fees:

We charge \$800-\$2500 (Based on complexity of the plan) we provide a Written Financial Plan, Investment Plan, and Investment Policy Statement. Fifty percent of Financial Planning Fees will be paid in advance.

-or-

Hourly Fee: \$250

Initial/Setup Fees (UK)

Initial/setup fees will be charged to each client based upon the complexity of their portfolio(s).

UK pension transfer client fees (minimum £100,000):

AMVEST Initial set up fee tiered:

- The first £100,000 @ 3%
- The next £100,001 to £250,000 @2%
- Any amount above £250,001 @1%

AMVEST Annual Fee:

-
- 1% per annum

Sippchoice Trustees Annual Fee:

- Flat fee £570 per annum

Defined Benefit Transfer service:

- Flat fee £1,500

UK pension transfer clients refer to British citizens living in the US who transfer their pensions.

All other fees may be negotiated by the client.

AB USA generally requires a minimum account of \$100,000 to open a portfolio.

The client will be responsible for any other miscellaneous charges incurred by our custodians:

- (1) TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC/NFA.
- (2) Dentons Pensions
- (3) Novia Global
- (4) Royal London
- (5) LGT Vestra

Each Account will be billed on a Monthly or Quarterly Basis.

The specific manner in which fees are charged by AB USA is established in a client's written agreement with AB USA. Alexander Beard (USA) Inc. will generally bill its fees on a quarterly basis. Clients may elect to be billed in advance or arrears at the end of each month or following quarter. Clients may also elect to be billed directly for fees (e.g. invoice send to client) or to authorize AB USA to directly debit fees from client accounts. Management fees shall be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

Advisory fees in general: In accordance with CCR Section 260.238(j), clients should note that lower fees for comparable services may be available from other sources. Fees charged are not refundable.

AB USA's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Such charges, fees and commissions are exclusive of and in addition to AB USA's fees and AB USA Inc. shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that AB USA considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

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

Alexander Beard (USA) Inc. does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Alexander Beard (USA) Inc. provides portfolio management services to individuals, high net worth individuals, pensions plan sponsors and 401(k) and profit-sharing plan sponsors, corporations, and other businesses.

AB USA generally requires a minimum account of \$100,000 to open a portfolio.

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

The Investment Management Directors of AB USA are responsible for screening, selecting and monitoring investment managers for each asset class. AB USA continuously tracks investment managers and monitors their performance on the basis of the following criteria:

- The manager's specification of and adherence to a clearly articulated and appropriate investment philosophy and process.
- Material changes in the manager's organization and personnel.
- Comparisons of performance results to appropriate indices that take into account asset class and investment style.

The main sources of information AB USA. uses to analyze securities are product websites, meetings with product wholesalers, third party research materials (e.g., Morningstar, FE Analytics), financial newspapers and magazines, and corporate ratings services.

Investment Strategies

AB USA bases its primary investment strategy on Modern Portfolio Theory which states that owning allocations of different asset classes that don't always move up or down together, is the best way to maximize returns while minimizing risk.

AB USA strives to construct efficient portfolios of internationally diversified stock and bond funds.

AB USA recommends standardized portfolios based on the results of the client's risk questionnaire. These include but are not limited to:

- **Stock Portfolio:** Seeks to provide long-term growth of capital with a time frame of over ten years.
- **Aggressive Growth Portfolio:** Seeks to provide long-term growth of capital with a time frame of at least seven years.
- **Growth Portfolio:** Seeks to provide long-term growth of capital with a moderate level of current income with a time frame of five years.
- **Moderate Growth Portfolio:** Seeks to provide long-term growth of capital with current income with a time frame of three to five years.
- **Conservative Growth Portfolio:** Seeks to provide a high level of current income with the opportunity for capital appreciation.

The portfolios are designed to maximize expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return.

Investment Risks

Investing involves risks that clients should understand and be prepared to accept. The risks can range from failing to keep pace with inflation to losing some or all of the money you invest.

Common risks that investors face for each investment strategy include:

Risks associated with Investment Management and Financial Planning

- **Systematic or Market Risks:** Relates to factors that affect the overall economy or securities markets. Market risk affects all companies, regardless of the company's financial condition, management, or capital structure, and, depending on the investment, can involve international as well as domestic factors.
- **Interest Rate Risks:** The risk that the value of a security will go down because of changes in interest rates. For instance, when interest rates rise, the yields on existing bonds

decrease and become less attractive to potential investors, causing their market values to decline.

- **Inflation Risks:** The risk that increases in the prices of goods and services, and therefore the cost of living, reduce your purchasing power.
- **Currency Risks:** This risk occurs because many world currencies float against each other. If money needs to be converted to a different currency to make an investment, any change in the exchange rate between that currency and yours can increase or reduce your investment return.
- **Liquidity Risks:** The risk of having difficulty in liquidating an investment position without taking a significant discount from current market value. Liquidity risk can be a significant problem with certain lightly traded securities such as unlisted options and municipal bonds that were part of small issues.
- **Non-systematic Risks:** The risk associated with investing in a particular product, company, or industry sector.
- **Management Risks:** Refers to the impact that bad management decisions, other internal missteps, or even external situations can have on a company's performance and, as a consequence, on the value of investments in that company.
- **Credit Risks:** The risk that an issuer of debt securities (e.g., bond) or a borrower default on its obligations and will be unable to make payment of interest or principal in a timely manner.
- **Financial Risks:** The risk that a company will be unable to meet its financial obligations. This risk is primarily a function of the relative amount of debt that the company uses to finance its assets. A higher proportion of debt increases the likelihood that at some point the company will be unable to make the required interest and principal payments.

Risk plays a key role in the investment strategy that AB USA advisory personnel develop for clients. AB USA primarily uses the following tactics to reduce investment risk:

- Diversification - Investing in a wide variety of assets to reduce risk
- Negatively correlated assets (prices move in the opposite direction) to reduce the volatility of the total portfolio and provide higher returns for less risk
- Ongoing monitoring processes and active management including transaction reviews, portfolio reviews, account rebalancing and regular client meetings to control risk.

Risks Associated with Mutual Funds/ETFs

Mutual funds and ETFs are subject to various risks, including the material risks noted below, any of which may adversely affect the Fund's NAV/market price, trading price, yield, costs, and ability to meet its investment objectives.

- **Asset Class Risk.** The securities and other assets in the underlying index or in a fund's portfolios may underperform in comparison to other securities or indexes that track other

countries, groups of countries, regions, industries, groups of industries, markets, asset classes or sectors. Various types of securities, currencies and indexes may experience cycles of outperformance and underperformance in comparison to the general financial markets depending upon a number of factors including, among other things, inflation, interest rates, productivity, global demand for local products or resources, and regulation and governmental controls.

- **Cyber Security Risk.** The funds' Authorized Participants, service providers and the relevant listing exchange are susceptible to operational, information security and related "cyber" risks both directly and through their service providers.
- **Equity Securities Risk.** The funds invests in equity securities, which are subject to changes in value that may be attributable to market perception of a particular issuer or to general stock market fluctuations that affect all issuers. Investments in equity securities may be more volatile than investments in other asset classes. The underlying index is comprised of common stocks, which generally subject their holders to more risks than holders of preferred stocks and debt securities because 3 common stockholders' claims are subordinated to those of holders of preferred stocks and debt securities upon the bankruptcy of the issuer.
- **Financials Sector Risk.** Financial companies, that make up the underlying investments in the fund, are subject to extensive governmental regulation and intervention, which may adversely affect the scope of their activities, the prices they can charge, the amount of capital they must maintain and, potentially, their size. Governmental regulation may change frequently and may have significant adverse consequences for companies in the financial sector, including effects not intended by such regulation.
- **Index-Related Risk.** The funds seeks to achieve a return that corresponds generally to the price and yield performance, before fees and expenses, of the underlying index as published by the index provider.
- **Information Technology Sector Risk.** Information technology companies face intense competition, both domestically and internationally, which may have an adverse effect on their profit margins. Like other technology companies, information technology companies may have limited product lines, markets, financial resources or personnel. The products of information technology companies may face obsolescence due to rapid technological developments, frequent new product introduction, unpredictable changes in growth rates and competition for the services of qualified personnel.
- **Management Risk:** The funds are subject to management risk because the investment managers (including strategists or third-party advisors) may apply strategies, techniques, and risk analysis that do not achieve the desired performance results. In addition, bad management decisions, other internal missteps, or even external situations can weigh on an underlying company's performance and, as a result, negatively impact the value of investments in the fund's portfolio.
- **Market Risk.** The funds could lose money over short periods due to short-term market movements and over longer periods during more prolonged market downturns. The value of a security or other asset may decline due to changes in general market conditions, economic trends or events that are not specifically related to the issuer of the security or

other asset, or factors that affect a particular issuer or issuers, country, group of countries, region, market, industry, group of industries, sector or asset class. During a general market downturn, multiple asset classes may be negatively affected. Changes in market conditions and interest rates generally do not have the same impact on all types of securities and instruments.

Risk Associated with Market Trading

- **Risk Absence of Active Market.** Although shares of the funds are listed for trading on one or more stock exchanges, there can be no assurance that an active trading market for such shares will develop or be maintained by market makers or Authorized Participants.
- **Risk of Secondary Listings.** Funds' shares may be listed or traded on U.S. and non U.S. stock exchanges other than the U.S. stock exchange where the Fund's primary listing is maintained, and may otherwise be made available to non-U.S. investors through funds or structured investment vehicles similar to depositary receipts.
- **Secondary Market Trading Risk.** Shares of the funds may trade in the secondary market at times when the fund does not accept orders to purchase or redeem shares. At such times, shares may trade in the secondary market with more significant premiums or discounts than might be experienced at times when the fund accepts purchase and redemption orders. Secondary market trading in fund shares may be halted by a stock exchange because of market conditions or for other reasons. In addition, trading in fund shares on a stock exchange or in any market may be subject to trading halts caused by extraordinary market volatility pursuant to "circuit breaker" rules on the stock exchange or market. Shares of the funds, similar to shares of other issuers listed on a stock exchange, may be sold short and are therefore subject to the risk of increased volatility and price decreases associated with being sold short.
- **Shares of the Funds May Trade at Prices Other Than NAV.** Shares of the funds trade on stock exchanges at prices at, above or below the Fund's most recent NAV. The NAV of the funds are calculated at the end of each business day and fluctuates with changes in the market value of the funds' holdings. The trading price of the funds' shares fluctuates continuously throughout trading hours based on both market supply of and demand for fund shares and the underlying value of each fund's portfolio holdings or NAV.
- **Operational Risk.** The funds might be exposed to operational risks arising from a number of factors, including, but not limited to, human error, processing and communication errors, errors of the funds' service providers, counterparties or other third parties, failed or inadequate processes and technology or systems failures.
- **Passive Investment Risk.** Passive managed funds may be affected by a general decline in market segments related to the underlying index. The funds invest in securities included in, or representative of, the underlying index, regardless of their investment merits.
- **Securities Lending Risk.** The funds may engage in securities lending. Securities lending involves the risk that funds may lose money because the borrower of the loaned securities fails to return the securities in a timely manner or at all. The funds could also lose money in

the event of a decline in the value of collateral provided for loaned securities or a decline in the value of any investments made with cash collateral.

- **Tracking Error Risk.** The funds may be subject to tracking error, which is the divergence of fund performance from that of the underlying index. Tracking error may occur because of differences between the securities and other instruments held in each fund's portfolio and those included in the underlying index, pricing differences, differences in transaction costs, the fund's holding of uninvested cash, differences in timing of the accrual of or the valuation of dividends or interest, tax gains or losses, changes to the underlying index or the costs to the fund of complying with various new or existing regulatory requirements.

Clients may receive a copy of each fund/ETF prospectus for a full overview of all investment products offered by our firm.

While these tactics can reduce risk, there are times when almost all asset classes can decline simultaneously, especially in the short-term. AB USA cautions all clients and potential clients that investing in securities involves risk of loss; although AB USA does its best to minimize risk, clients should be prepared to bear losses when they occur.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of AB USA or the integrity of AB USA's management.

Alexander Beard (USA) Inc. has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Neither AB USA, nor any of its management persons, has a pending application to register as a broker-dealer.

Neither AB USA, nor any of its management persons, has a registration or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading adviser, or an associated person of the foregoing entities.

AB USA has relationships or arrangements that are material to its advisory business.

AB USA reminds clients that they are not obligated in any manner to implement the recommendations of its advisers in their separate capacities as insurance agents.

AB USA is affiliated with Alexander Beard Investment Management Limited, an FCA regulated investment firm based in the UK. Alexander Beard Group PLC owns a stake in both companies.

AB USA does not recommend third-party investment managers as a sub-advisory for its clients' portfolios.

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

AB USA has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at AB USA must acknowledge the terms of the Code of Ethics annually, or as amended.

AB USA anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which AB USA has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which AB USA, its affiliates and/or clients, directly or indirectly, have a position of interest. AB USA employees and persons associated with AB USA are required to follow AB USA Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of AB USA and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for AB USA clients. The Code of Ethics is designed to assure that the personal securities transactions, activities, and interests of the employees of AB USA will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of AB (USA) clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between AB USA and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with AB USA obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. AB USA will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

AB USA clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Melissa Eugenio at 650-684-0450 or Melissa.Eugenio@abg-usa.net.

It is AB USA's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. AB USA will also not cross trade between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

AB USA currently uses TD Ameritrade as its primary custodian. Clients engaging AB USA for portfolio management services authorize the adviser to determine the securities to be bought and sold, including the number of shares and/or dollar value. AB USA authority is limited to trading activity in the investment account belonging to the client and does not authorize AB USA to transfer money or securities into or out of the account.

Client assets must be held at a qualified custodian which is generally a broker-dealer or bank. AB USA recommends that clients hold their assets at TD Ameritrade, an unaffiliated broker-dealer that is a member of FINRA and the SIPC. AB USA considers several factors prior to recommending a custodian including financial strength, reputation, reporting, execution, pricing, and research. Generally, client account custodians are compensated in the form of brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity/debt securities transactions). To the extent TD Ameritrade charges transaction fees and commissions, it charges rates which are generally considered discounted from customary retail commission rates. However, the commissions and/or transaction fees charged by TD Ameritrade may be higher or lower than those charged by other custodians.

Royal London

AB USA uses Royal London, an institutional trading platform, for its equity and bond type mutual funds.

Dimensional Fund Advisors

AB USA uses Dimensional Funds, an institutional trading platform, for its equity and bond type mutual funds.

Novia Global

AB USA uses Novia Global for investment for its Self-Invested Personal Pension (SIPP) clients. SIPP is a UK government-approved personal pension option.

Novia Global provides access to two types of Products, a Global Investment Account (GIA) and an International SIPP. For each Product we allow Investors to benefit from a variety of portfolio management options, including:

- aggregating the assets held to align reporting and treatment with the appropriate regulatory structures
- showing the valuations and charges for each Product in a clear manner
- easily selecting those assets that are appropriate to hold in a particular Product from the wide range of funds on offer
- using the tools we provide to manage investments held

Novia's standalone Model Portfolio Management Tool (MPM) enables our firm to take full administrative control over their model portfolios, creating and managing them online.

There are several other benefits including:

- Advisors, Private Banks and Trust Companies will be able to establish their own model portfolios or work with a DFM.
- It will be possible to establish an unlimited number of portfolios for different risk profiles for both Novia Global Products.
- MPM provides the choice of updating some or all clients within a model by one simple instruction.
- MPM has the functionality to synchronize all clients' trades within a model portfolio. The single dealing point provides equality across clients.

Directed Brokerage

Alexander Beard (USA) Inc. will use TD Ameritrade, Royal London, Novia Global, and Dimensional Institutional brokerage services for managing client accounts. All new accounts, including those managed by other broker-dealers, will be opened through TD Ameritrade. Clients will not negotiate terms and arrangements for the account.

Soft Dollar or Economic Benefits

AB USA participates in TD Ameritrade's, client program for custody and brokerage services. There is no direct link between AB USA's participation in the program and the investment advice given to

clients, although AB USA receives economic benefits through participation in the program that are typically not available to TD Ameritrade's retail investors.

These benefits include the following products and services (provided without cost or at a discount): duplicate client statements and confirmations; research related products and tools; consulting services; ability to trade in an omnibus account; the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees; and discounts on compliance, marketing, research, technology, and practice management products or services provided to AB USA by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by AB USA related persons and may also pay or reimburse expenses (including travel, lodging, meals and entertainment expenses) for AB USA personnel to attend conferences or meetings relating to the program or to TD Ameritrade adviser custody and brokerage services.

Some of the products and services made available by TD Ameritrade through the program may benefit AB USA but may not benefit AB USA client accounts. These products or services may assist AB USA in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD are intended to help AB USA manage and further develop its business enterprise.

The benefits received by AB USA through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by AB USA or its advisory associates in and of itself creates a potential conflict of interest and may indirectly influence AB USA's recommendation of TD Ameritrade for custody and brokerage services. Royal London, Novia Global, and Dimensional Fund Advisors do not provide any soft dollar arrangements.

Brokerage for Client Referrals

AB USA does not receive client referrals from a broker-dealer or third party when recommending brokers for client accounts.

Trade Aggregation

TD Ameritrade allows AB USA to use an omnibus account to enter client trades. Transactions in individual client accounts are combined into the master omnibus account thereby reducing the transaction fees charged by the custodian and ultimately benefitting the clients.

Item 13 – Review of Accounts

Mark James, Investment Advisor Representative, reviews all investment advisory accounts no less than quarterly following receipt of the current portfolio report from the custodian or more frequently if market conditions change. For instance, if there is a change in the tax laws, investment information and/or a client's financial situation, then this new information may trigger an interim review.

The Chief Compliance Officer is authorized to delegate some of the review responsibility to other qualified advisory associates from time to time to add specialized product expertise, to accommodate for high volume of reviews, and/or to otherwise enhance the review process. There is no limit on the number of accounts reviewed by Mr. James.

Investment portfolios are reviewed for consistency with the investment strategy and performance. The reviews include at minimum an evaluation of the portfolio holdings relative to a client's stated objectives, and an appraisal of the performance in the account relative to expectations based on market performance, economic conditions, allocation in the account and other factors. Quarterly and interim portfolio reviews are considered an integral part of the management service, and do not trigger any additional fees to the customer.

Reports

Investment advisory clients will receive written statements (monthly or quarterly depending on the level of activity in the account) and transaction confirmations directly from the account custodian. AB USA also provides clients with a written quarterly Portfolio Appraisal report that includes the client's account holdings priced as of the last business day of the month, income and expense summary that includes dividends and interest received plus any withdrawals from the account, and a performance report. AB USA encourages clients to compare the custodial statements with the Advisor's Portfolio Appraisal reports to reconcile and compare holdings, prices, transaction records, reconcile the account value to the fee invoice, and review other activity in the account.

Item 14 – Client Referrals and Other Compensation

AB USA does not have arrangements with third parties who provides an economic benefit to the firm for providing investment advice or other advisory services to our clients.

AB USA does not directly or indirectly compensate any person for client referrals.

Conflicts of Interest: We may have a conflict of interest in making a third-party recommendation for venture capital investments based on our compensation arrangement with Shoreline Ventures.

How We Handle: We will provide our client with an investment suitability analysis to assess the appropriateness of alternative investments for our “Accredited Investor” clients. We will not make any recommendations if those clients do not meet our suitability guidelines for investment appropriateness. In addition, we have purchased E&O insurance to provide our clients with protections in case of a firm error in relation to these investments.

Item 15 – Custody

Custody Safeguarding

AB USA has custody of the funds and securities solely as a consequence of its authority to make withdrawals from client accounts to pay its advisory fee.

AB USA maintains written authorization from the client to deduct advisory fees from the account held with the qualified custodian.

Each time a fee is directly deducted from a client account, Adviser concurrently:

Sends a qualified custodian an invoice or statement of the amount of the fee to be deducted from the client’s account; and/or

Sends the client an invoice or statement itemizing the fee. Itemization includes the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee.

Notifies the Commissioner in writing that the investment adviser intends to use the safeguards provided above.

This means that client assets will be held at a qualified custodian according to a separate written agreement between the client and the custodian. The client should expect to receive regular written account statements at least quarterly from the custodian, and may contact AB USA and/or the custodian with questions or concerns. A client may opt to access the custodial reports online. Any client wishing to enroll in this online service may contact AB USA. The custodian's statement will include a telephone number, which the client may use to contact the custodian directly. The Adviser encourages clients to use custodial reports to reconcile and compare holdings, prices, transaction records, reconcile the account value to the fee invoice, and review other activity in the account.

AB USA receives electronic copies of client statements so that an associate can monitor the account's performance and assist the client with ongoing allocations or investments. In no circumstances is

AB USA authorized to issue any instructions (other than directly from the client) for the distribution of funds or securities from the client's account.

Item 16 – Investment Discretion

AB USA performs investment-related services on a discretionary basis. This means that AB USA has the authority to determine the securities to buy and sell without the client's prior consent as stated in the investment advisory contract. Clients may place any limitations on the adviser's discretionary authority by contacting the firm and/or by requesting added stipulations added to their client.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, AB USA does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. All proxies will be received by the clients' custodian. AB USA may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

AB USA does not have custody of client assets and does not charge a prepayment fee in excess of \$1,200 for six months or more of services.

The firm's Managing Directors are not aware of any financial condition that would prevent AB USA from delivering contractual services to clients.

AB USA and its Managing Directors have neither claimed protection from creditors nor have they ever filed bankruptcy.

Privacy Disclosure: AB USA is committed to safeguarding the confidential information of its clients and holds all personal information provided to it in confidence. Confidential records include the non-public personal information that the Adviser collects from its clients or receives from other firms in connection with any of the financial services they provide. AB USA also requires other firms with whom they do business to restrict the use of client's information. The Adviser will provide its Privacy Policy upon a client's engagement of the firm's services along with an "opt-in" notice.