

LVM Capital Management, Ltd.
7840 Moorsbridge Portage, MI 49024
269-321-8120
www.lvmcapital.com

This September 30, 2022 Brochure provides information about the qualifications and business practices of LVM Capital Management, Ltd. ("LVM", "we"). If you have questions about the contents of this Brochure, please contact LVM at 269-321-8120 or email info@lvmcapital.com. 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. LVM's Brochure may be requested by calling 269-321-8120 or emailing info@lvmcapital.com. LVM's Brochure is also available at www.lvmcapital.com.

LVM 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 LVM Capital Management, Ltd. also is available on the SEC's website at www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with LVM who are registered or are required to be registered as investment adviser representatives of LVM Capital Management, Ltd.

Pursuant to SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of LVM's fiscal year. We provide other ongoing disclosure information about material changes as necessary. We will provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Item 2 – Material Changes

Since LVM's last brochure update on December 31, 2021, there were two material changes. In Item 4, LVM's fiduciary status is described and acknowledged and LVM's assets under management are updated.

Item 3 -Table of Contents

Section A

Item 1 – Cover Page.....	1
Item 2 – Material Changes	1
Item 3 -Table of Contents.....	2
Item 4 – Advisory Business	3
Item 5 - Fees and Compensation.....	3
Item 6 - Performance-Based Fees and Side-By-Side Management.....	4
Item 7 – Types of Clients	5
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	5
Item 9 – Disciplinary Information.....	5
Item 10 - Other Financial Industry Activities and Affiliations.....	5
Item 11 - Code of Ethics.....	5
Item 12 – Brokerage Practices.....	6
Item 13 – Review of Accounts	7
Item 14 – Client Referrals and Other Compensation	8
Item 15 – Custody.....	8
Item 16 – Investment Discretion	9
Item 17 – Voting Client Securities	9
Item 18 – Financial Information	9

Item 4 – Advisory Business

LVM, founded in July 1988, furnishes wealth management services, integrating investment management and financial planning. Craig A. Vander Molen, CFA, is the majority owner. Investment supervisory services include continuous advice as to the investment of funds based on the individual needs of a client. Financial planning includes collecting, organizing, and analyzing a client's financial data to provide optimal wealth design through appropriate account structure (including taxable and non-taxable accounts and strategies used within each) and income tax and estate tax strategies on the basis of the individual needs of a client. LVM considers such factors as the size and source of the account, client's identity and background, the client's income and growth objectives, cash flow needs, income tax bracket, potential federal and state estate taxes, and the client's relative risk aversion. The individual needs and situation of each client dictate whether or not both investment supervisory and financial planning services are utilized. Clients may impose investment restrictions on individual securities or security types. LVM does not provide investment advice on all possible investments.

In two client relationships, LVM is retained under a wrap-fee program. In a wrap fee program a broker/dealer recommends LVM to manage a client's assets, pays LVM's investment management fees on behalf of the client, executes the client's securities transactions without commission charges, monitors portfolio performance and acts as custodian, or provides some combination of these or other services, all for a single fee. LVM's investment advisory fee in a wrap-fee arrangement may vary from that charged to wealth management clients. In evaluating such a program, a client should understand that LVM cannot negotiate brokerage commissions. Transactions are effected "net" and a portion of the wrap fee is generally considered in lieu of explicit brokerage commissions. Trades will be generally executed with the referring broker/dealer to avoid incurring the incremental brokerage costs from incurred using other broker/dealers. In evaluating a wrap fee arrangement, the client should consider whether, depending on the amount of the wrap fee, the amount of portfolio activity and the value attributed to monitoring, custodial, and any other services provided, the wrap fee would exceed the cost of such services if they were separately provided and LVM were free to choose broker/dealers to execute portfolio transactions.

In limited cases, LVM is retained for investment management only for clients who receive financial planning from a broker/dealer's registered representative. At the broker/dealer's specific request, LVM invoices these joint clients for both its investment management fee and the broker/dealer's registered representative fees, remitting to the broker/dealer its portion of the fee.

LVM's business continuity plan addresses pandemics and health crises. While the global COVID-19 pandemic did not impede LVM's ability to serve its clients and manage its business, future health crises could negatively affect LVM's ability to serve its clients.

Fiduciary Status

Pursuant to the Employee Retirement Income Security Act of 1974 ("ERISA"), and regulations under the Internal Revenue Code of 1986 ("Code"), LVM and its individuals providing wealth management advice on our behalf ("Fiduciary Advisers" or "FAs") will be deemed investment advice fiduciaries ("ERISA Fiduciaries") when LVM renders individualized investment advice to a plan, plan fiduciary, plan participant or beneficiary, IRA, or IRA owner, Health Savings Accounts ("HSAs"), Archer Medical Savings Accounts and Coverdell Education Savings Accounts (together, "Retirement Accounts") for a fee or other compensation, whether direct or indirect. While LVM is already a fiduciary for all of its advised accounts under the Investment Advisers Act of 1940, LVM is required to acknowledge this ERISA Fiduciary status.

Acknowledgement of Fiduciary Status

Pursuant to the recommendations LVM provides to retirement account(s) and client acceptance thereof, LVM acknowledges that together with its FAs that it is acting as Fiduciaries under ERISA with respect to recommended transactions. As ERISA Fiduciaries to clients, LVM and its FAs have an affirmative duty of undivided loyalty to always serve clients' best interests and act in utmost good faith, placing clients' interests first and foremost without regard to the financial interests of its employees, related entities, or other parties. Further, as Fiduciaries LVM and its FAs are required to act prudently on its clients' behalf, exercising care, skill and diligence when providing wealth management services. As ERISA Fiduciaries, LVM and its FAs are committed to these Impartial Conduct Standards: (i) providing prudent advice that is, at the time of the recommendation, in the best interest of a client, (ii) receiving no more than reasonable compensation, and (iii) statements made regarding the recommended transaction, fees and compensation, material conflicts of interest and other matters relevant to the retirement investor's investment decisions, will not be materially misleading at the time they are made.

At August 31, 2022, LVM managed \$972,430,814 discretionary assets and \$26,232,521 non discretionary assets.

Item 5 – Fees and Compensation

LVM receives a fee for wealth management services in an amount established with each client and specified in the client's investment advisory agreement. LVM reserves the opportunity to negotiate wealth management fees. The general fee schedule is:

<u>Market Value of the Account</u>	<u>\$ or Percent Annual Fee</u>
< \$2 million	1.25 %
\$2,000,000 to \$5,000,000	1.00 %
> \$5 million	Negotiated

The fee may be higher or lower depending on the size of the account, services rendered, or for a family relationship or charitable organization. Other fee arrangements may be negotiated with individual clients including fixed fees or hourly fees, particularly, but not exclusively, in the production of a financial plan. Wealth management fees are invoiced and payable quarterly in arrears. Fees are based on the market value of each account on the last business day of the quarter. Clients may choose to have fees debited directly from an advised account or may pay by check. A client may terminate the investment advisory agreement at any time upon thirty days prior written notice. The fees for the quarter in which termination occurs will be prorated. When LVM provides investment management only for clients who receive financial planning from a broker/dealer's registered representative, the clients total fee is not more than the schedule above. LVM believes that its fees are fair and reasonable. Other registered investment advisors may offer similar services for fees that are more or less than LVM's fees. LVM does not receive commissions from investment products or fees or commissions generated by securities trades in any client account.

Occasionally LVM grants a fee waiver to a client account. Generally, but not exclusively, this accommodation relates to small accounts of children of existing clients.

Any client who is invested in shares of mutual funds, exchange traded funds, or other investment companies ("Funds") is subject to additional advisory fees and expenses as set forth in the prospectus of such Funds, paid by the Funds, but ultimately borne by the investor. These fees are in addition to any LVM fees. LVM does not receive any portion of these fees. LVM's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses incurred by the client. Clients may incur certain charges imposed by custodians, brokers/dealers, 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, trade away fees, and other fees and taxes on brokerage accounts and securities transactions. Refer to section 12 for more information on LVM's brokerage practices.

Clients selecting a bank trust company as a custodian typically pay an explicit custody fee to the bank for its services. This fee is in addition to any LVM fees. All client accounts (except those under a wrap fee) bear the cost of explicit trading commissions and brokerage fees regardless of custodial arrangement. Occasionally LVM will execute a "trade away", where a broker/dealer custodian is not the executing broker/dealer but settles the trade on a delivery versus payment basis. Generally the broker/dealer custodian charges a nominal flat fee for this service. This fee is in addition to any LVM fees. A trade away occurs when LVM determines that a client's total trade proceeds are optimized versus the same trade with the broker/dealer custodian. Item 12 further describes the factors that LVM considers in selecting or recommending broker/dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

LVM, occasionally and only at the request of a client, reviews and offers advice on interests in partnerships investing in assets other than real estate or oil and gas interests. LVM receives a wealth management fee on real estate limited partnerships that are part of a client's managed assets. LVM, as part of its financial planning function for some wealth management clients, reviews and offers advice on various types of life insurance and annuities. LVM, occasionally, and only at the request of the client, reviews and offers advice on long term healthcare insurance. LVM does not receive fees or commissions on the purchase or sale by clients of life insurance, annuities, or long-term care insurance and does not receive compensation for referring clients to other financial professionals for analysis of these vehicles.

LVM outsources the filing of all securities class action claims to Chicago Clearing Corporation (CCC). CCC is compensated with a 15% contingency fee paid from the awards it obtains for LVM's clients. Neither LVM nor its clients pay an explicit or

upfront fee to engage CCC. LVM receives no compensation from CCC. Clients may opt out of CCC's service by completing and returning to LVM an opt-out letter.

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

LVM 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 account).

Item 7 – Types of Clients

LVM provides wealth management services to individuals, high net worth individuals, bank trust departments, corporate pension and profit-sharing plans, charitable institutions, foundations, endowments, and other U.S. institutions. LVM generally requires a minimum of \$1,000,000 to establish a relationship, but takes into consideration the interrelationships of accounts and client referrals and occasionally makes exceptions to this guideline.

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

Investing in securities involves risk of loss that clients should be prepared to bear. Investing in publicly-traded mark-to-market securities always poses market risk and company-specific risk that clients should be prepared to bear. LVM uses Bloomberg, Morningstar, Ycharts, Sentieo, and Thinkpipes, as well as numerous publically available resources, including company websites, through which it accesses a wide variety of data including, but not limited to, historical financial information and earnings estimates for companies followed by Wall Street analysts. LVM uses a fundamental approach to investing that emphasizes traditional valuation measures for selecting individual securities. These measures (including, but not limited to, price/earnings, price/book, price/sales, cash flow, return on equity, return on invested capital, leverage ratios, and spread versus U.S. Treasuries) are compared with a security's historic measures as well as to overall market measures. LVM also uses asset allocation (balancing a portfolio's holdings among various asset classes) to reduce the risk of permanent loss of capital over longer periods of time. Generally LVM intends to hold positions in client accounts over one year, although occasionally securities are purchased and sold in shorter periods. Taxable accounts are often treated differently than tax-deferred accounts. In addition, accounts using equity covered call or equity put writing strategies experience more frequent portfolio turnover as stock is delivered via option assignment. More frequent trading can increase client brokerage commissions and can produce short-term capital gains or losses. Clients writing put options face the risk of having to purchase a security at a specific price in the future. Clients writing call options face the risk of having to deliver a security at a specific price in the future. Clients buying options risk losing their entire investment.

Some clients use LVM's Top 10 or Top 10 Plus Portfolio strategies. The Top 10 Portfolio is a strategy based on a quantitative model that measures the relative strength of the stocks in the S&P 500 stock index. The model identifies the highest-ranked stocks from ten S&P 500 sectors and one stock from each S&P sector is selected based on its near-term projected capital appreciation potential. These ten stocks are weighted equally in a separately managed portfolio. The Top 10 Portfolio is rebalanced quarterly. The Top 10 Plus Portfolio combines the Top 10 Portfolio (50%) with a Broad Market Indicator (BMI) strategy (50%). The BMI strategy is based on LVM's proprietary market risk analysis using a multi-factor model which measures the overall trend of the U.S. equity market. When the BMI model demonstrates an uptrend in the equity markets, 50% of the portfolio is invested in an S&P 500 exchange-traded fund (ETF). When the BMI model demonstrates a down trend in the U.S. equity market, the portfolio is invested in an inverse (short) S&P 500 ETF or cash. The Top 10 Plus Portfolio is rebalanced quarterly. Both Top 10 strategies are speculative and aggressive strategies employed only as part of a client's total portfolio. Neither strategy is tax-efficient and neither can protect a stock allocation from general U.S. equity market declines.

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 LVM or the integrity of LVM's management. In July 2013, LVM entered a stipulation and consent agreement with the State of Florida's Office of Financial Regulation for the inadvertent omission of a Form U-4 filing. Craig A. Vander Molen's U-4 filing in Florida is current as of July 2013.

Item 10 – Other Financial Industry Activities and Affiliations

Neither LVM nor its principals are registered with or have an application pending to register as a broker/dealer, futures dealer, commodity adviser, or as an associated person of the foregoing entities.

Item 11 – Code of Ethics

LVM's Code of Ethics ("COE") sets forth a standard of business conduct required of all employees. The COE mandates honest and ethical conduct at all times. This COE supplements the policies and procedures contained in the Company's Compliance Manual and departmental manuals. This COE reflects LVM's values of responsible business and personal ethics, respect, teamwork, innovation, and excellence. Clients or prospective clients will be provided a copy of the COE upon request at no cost. All supervised persons at LVM annually acknowledge the terms of the COE.

LVM's employees occasionally buy or sell, for their personal accounts, securities that LVM also recommends to clients. It is LVM's policy that transactions for its clients have priority over personal transactions of LVM or its employees and personal transactions do not operate adversely to clients' interests. To avoid conflicts of interest, no personal transactions for LVM or its employees in a particular security are permitted when client orders to buy or sell the same are outstanding. Occasionally, an LVM employee, via a put or call option assignment, participates in a transaction on the same side and at the same time as a client trade. LVM does not consider this a trading conflict as there is no price impact to either the employee or client trade. LVM employs a computerized personal employee transaction reporting and preclearance system. The Code is designed to ensure that personal securities transactions, activities and interests of the employees of LVM will not interfere with (i) making decisions as a fiduciary for advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under LVM's Policies and Procedures and the Code certain classes of securities have been designated as exempt transactions, based on a determination that these do not conflict with transactions of LVM's clients.

LVM does not perform principal transactions for client accounts. Principal transactions are 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 a security to any advisory client.

LVM, using an independent broker/dealer, occasionally crosses bonds between client accounts. This is known as a cross trade and occurs when LVM requests that an independent broker/dealer execute both a buy and a sell trade for the same security with one client account selling the bond to another client's account. In such cases, the independent broker/dealer provides prices for both sides of the trade and LVM determines that the prices are or are not appropriate. If LVM determines that the prices are not appropriate, it negotiates price improvement(s) to affect the trade or elects not to execute the trade. In executing a cross trade, the independent broker/dealer includes a mark down or mark up in its prices to the selling and buying client accounts and the trades are executed net, or without an explicit commission. A trade away fee applies if the independent broker/dealer is not the account custodian. Trade away fees are paid to the client's account custodian by the client account. In executing a cross trade, LVM has determined that a trade is beneficial to both client accounts and that the prices, including mark down or mark up (plus trade away fees) are appropriate. A bond cross trade is considered when repositioning an account and/or when realizing capital gains or losses in a client's taxable account.

Item 12 – Brokerage Practices

Generally, LVM is retained on a discretionary basis and is authorized to determine and direct execution of portfolio transactions within the client's specified investment objective without consultation with its client on a transaction-by-transaction basis. LVM prefers to select broker/dealers who will execute portfolio transactions and generally the client leaves that selection to LVM, although occasionally a client directs the use of a particular broker/dealer to execute portfolio transactions. Some broker/dealers charge no explicit commissions on U.S. – listed equities and exchange-traded funds. Clients may limit discretionary authority in terms of type or amount of securities to be bought or sold or the broker/dealer to be used or the commission rates to be paid. Some clients retain LVM on a non-discretionary basis, requiring that portfolio transactions be discussed in advance and executed at the client's direction. LVM's overriding objective in the selection of broker/dealers is to obtain the best combination of price and execution. Best price, giving effect to brokerage commission, if any, and other transactions costs, is normally an important factor in this decision, but the selection also takes into account the quality of brokerage services, including such factors as execution capability, willingness to commit capital, financial stability, and clearance and settlement capability. Trade executions are monitored regularly regardless of brokerage arrangements. This regular review of trade executions consists of comparing the time and price when a trade is entered, and the time and price when a trade has been executed. Periodically, LVM will conduct a test of broker/dealers used by LVM to review trade executions. The reasonableness of brokerage commissions is evaluated on an on-going basis. LVM periodically reviews the general level of commissions paid and LVM's ability to negotiate commissions based on volume. Research furnished by broker/dealers is used in services for any or all of the clients of LVM and is used in connection with accounts other than those which pay commissions to the broker/dealer providing the research. LVM has no soft dollar arrangements.

Fixed income securities are generally purchased from a primary market maker acting as principal or from a broker/dealer acting as agent on a net basis with no brokerage commission paid by the client. Such securities, as well as equity securities, are also be purchased from underwriters at prices which include underwriting fees. Clients directing fixed income brokerage may incur an explicit trade commission. This commission compensates the broker/dealer and not LVM. Clients may incur a trade away fee in a fixed income cross trade. Refer to Section 11 for more information on cross trades.

If a client directs the use of a particular broker/dealer, LVM asks that the client also specify (1) general types of securities for which the designated firm should be used and (2) whether the designated firm should be used for all transactions, even though LVM might be able to obtain a more favorable net price and execution from another broker/dealer in particular transactions. A client who designates use of a particular broker/dealer, including a client who directs use of a broker/dealer which will also serves as custodian (whether or not recommended by LVM) should consider whether, under that designation, commission expenses, execution, clearance and settlement capabilities, and whatever amount is regarded as allocable to custodian fees, if applicable, will be comparable to those otherwise obtainable by LVM. A client who designates use of a particular broker/dealer should understand that he/she will lose the possible advantage which non-designating clients derive from aggregation of orders for several clients as a single transaction for the purchase or sale of a particular security, and LVM is not authorized to negotiate commissions on behalf of the client or otherwise able to obtain volume discounts or best execution of transactions. LVM typically processes client trades starting with its largest custodian (by assets under management) down to its smallest custodian.

Orders to buy or sell shares or write call or put options may be aggregated. Clients designating the use of a particular broker/dealer should understand that aggregate orders for those clients not designating a particular broker/dealer may be given priority. LVM does not aggregate client stock, bond, or option orders if it believes that aggregation would increase clients' execution costs. Allocation of shares per client is indicated before an aggregate order is placed. If an aggregate stock order is entirely filled, it will be allocated among clients according to the original allocation. If an aggregate stock order is not entirely filled, shares are allocated depending on the percentage of the aggregate order bought or sold. If the aggregate stock order is less than fifty percent complete, the order is allocated randomly to clients. The random selection of clients and allocation of shares occurs within LVM's Moxy trading system. If the aggregate stock order is fifty percent or more complete, clients receive a pro rata allocation of shares. When an aggregate stock order is not entirely filled and the broker dealer is not the custodian, the broker/dealer's commission is allocated pro rata. The proration of stock shares (and commissions when necessary) occurs within LVM's Moxy trading system. If an aggregate call or put option order is not entirely filled, the order will be filled starting with the client with the largest number of options to the client with the smallest number of options based on the original allocation. This process is reversed on the next option order not entirely filled and allocates from the client with the smallest number of options in the order to the client with the largest. This process reverses each time an aggregate option order is not entirely filled. The LVM trading desk keeps an internal accounting to maintain the integrity of this aggregate option order process. While LVM's overriding objective in affecting portfolio transactions is to receive the best combination of price and execution, it is not always practicable to pro rate some aggregate orders, including, but not limited to, aggregate orders with odd lot allocations, aggregate "limit" orders, or option trades. In such cases, allocations on a different basis will be approved by the compliance officer only if all participating clients receive fair treatment.

LVM recommends that a client use a bank trust company or broker/dealer as custodian for client assets. In recommending any of these, LVM considers a client's principal residence, asset reporting requirements, personal service requirements, portfolio size, probable trading activity and probable asset allocation, explicit and implicit costs, and LVMs prior general experience, if any, with the custodian. LVM also occasionally suggests the use of brokers/dealers when the suggested broker/dealer is not the custodian. In doing so, LVM considers the broker/dealer's execution, clearance and settlement capabilities, whether the broker/dealer offers insurance in excess of the insurance afforded by the Securities Investor Protection Corporation, LVM's knowledge of the broker/dealer's financial stability and capabilities, the broker/dealer's willingness to negotiate commission rates, and the value of research services provided to LVM. Research furnished by these suggested brokers/dealers is used for all LVM clients and is used for accounts other than those which pay commissions to the broker/dealer providing the research.

LVM participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA ("TD Ameritrade"), an unaffiliated SEC-registered broker/dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which

include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the Program. (Please see the disclosure under Item 14.)

Item 13 – Review of Accounts

Each account is reviewed on an ongoing basis by a portfolio manager for adherence to an investment policy, and relative value of the investments. All portfolios are reviewed annually by the firm's principals, comprised of portfolio managers, financial planners, and compliance personnel, for conformity to current investment policy and strategy, and the goals and objectives of the client. Financial plans are updated and reviewed throughout the year as clients provide new information to LVM's financial planning staff. Financial plans are reviewed prior to client presentation by the financial planning team and the portfolio manager.

The reviewers are Craig A. Vander Molen, Managing Principal, principals L. Leonard Harrison, David P. Cleveland, and Charles A. Prudhomme, and wealth management advisors Tyler W. Alvord and Jordan J. Rummel. Cleveland is also the chief compliance officer and Prudhomme the assistant chief compliance officer. Each principal/advisor is responsible for, on average, fifty client relationships. Many clients maintain multiple accounts.

Wealth management clients receive, not less frequently than quarterly, a statement of assets for each account and annually a financial plan or plan update. Asset statements are sent to clients via regular mail, electronically (via e-mail), or accessed through LVM's client vault. Investment advisory only clients receive, not less frequently than quarterly, a statement of assets for each account. Several clients, at their request, receive an annual statement of assets from LVM. These clients do not desire duplicate statements from LVM and their custodians. Custodians provide monthly statements to clients via regular mail or electronically. Other information is provided by arrangement with each client.

Generally, an LVM principal and/or advisor meets in person with a client at least annually and in many cases more frequently. Client investment portfolios and financial plans are reviewed at these meetings and clients receive multiple written reports including, but not limited to, capital markets outlooks, portfolio appraisals, asset allocations, investment performance, net worth, annual cash flow, and estate planning charts.

Item 14 – Client Referrals and Other Compensation

LVM participates in TD Ameritrade's institutional advisor program and LVM often recommends TD Ameritrade to Clients for custody and brokerage services. There is no direct link between LVM's participation in the program and the investment advice it gives to its Clients, although LVM receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk and service team; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); 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 or exchange-traded funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to LVM by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by LVM's related persons. Some of the products and services made available by TD Ameritrade through the program benefit LVM but may not benefit its Client accounts. These products or services assist LVM in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help LVM manage and further develop its business enterprise. The benefits received by LVM or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, LVM endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by LVM or its related persons in and of itself creates a conflict of interest and indirectly influence LVM's choice of TD Ameritrade for custody and brokerage services. For information regarding additional or other fees paid directly or indirectly to TD Ameritrade, please refer to the TD Ameritrade AdvisorDirect Disclosure and Acknowledgement Form.

LVM receives some economic benefit from non-clients in connection with giving advice to clients. This benefit derives from placing transactions with LVM selected or client directed broker/dealers who provide LVM with information used in its research activities. Research furnished by broker/dealers is used in services for all LVM clients and is used for accounts other than those which pay commissions to the broker/dealer providing the research. LVM does not enter agreements

with, or make commitments to, any broker/dealer that would bind LVM to compensate that broker/dealer, directly or indirectly, for research projects.

Item 15 – Custody

LVM has custody of some client assets due to client-initiated standing letters of authorization (SLOA), on file at qualified custodians and at LVM and because an LVM principal acts as trustee for two client accounts. These two accounts are subject to an annual surprise examination by an independent accounting firm. Via an SLOA, LVM is able to process, upon a client's request, specific cash or securities transfers between client accounts or between a client account and a third party. LVM uses qualified independent custodians, either trust companies or broker/dealers to custody client accounts. Clients should receive at least quarterly statements from the broker/dealer or trust company that holds and maintains client's investment assets. LVM urges clients to carefully review such statements and compare official custodial records to their LVM statements. LVM statements vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. LVM's wealth management clients receive, not less frequently than quarterly, a statement of assets for each account and annually a financial plan or plan update. Statements are sent to clients via U.S. mail. Clients also access statements via LVM's secure client vault. Investment advisory only clients receive, not less frequently than quarterly, a statement of assets for each account. LVM directly debits wealth management fees from client accounts at their direction. As part of this process, a client's custodian is advised of the fee to be deducted from an account. Because the custodian does not calculate the fee, it is important for clients to review the copy of their invoice to verify the accuracy of the calculation. Clients should contact LVM directly with any fee invoice questions. Several clients, at their request, receive an annual statement of assets from LVM. These clients do not desire duplicate monthly or quarterly statements from LVM and their custodians. Custodians provide monthly statements to clients via U.S. mail or custodial website access. Other information is provided by arrangement with each client.

Item 16 – Investment Discretion

LVM is retained on a discretionary basis via a written investment advisory contract. In the contract, LVM is authorized to determine and direct execution of portfolio transactions within the client's investment objectives from the client's written personal investment policy without consultation with the client on a transaction-by-transaction basis. LVM prefers to select broker/dealers who will execute portfolio transactions and generally the client leaves that selection to LVM, although occasionally a client directs the use of a particular broker/dealer to execute portfolio transactions. Clients may limit discretionary authority in terms of type or amount of securities to be bought or sold or the broker/dealer to be used or the commission rates to be paid. Some clients, via a written investment advisory contract, retain LVM on a non-discretionary basis, requiring that portfolio transactions be discussed in advance and executed at the client's direction.

Item 17 – Voting Client Securities

Unless otherwise specifically agreed in writing, LVM will not be required to take any action, or render any advice, with respect to the voting of securities in client accounts. Accounts subject to ERISA are not exempted from voting under this section. Clients may obtain a copy of LVM's complete proxy voting policies and procedures upon request by calling 269-321-8120 or via email at info@lvmcapital.com. ERISA clients or those clients for whom LVM has agreed in writing to vote proxies may also obtain information from LVM about how LVM voted any proxies on behalf of their account(s). To minimize conflicts of interest and clarify issues, LVM will, at any client's request, discuss its proxy voting policies.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide clients with certain financial information or disclosures about LVM's financial condition. LVM has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.