

BEST LIFE INFINITY, LLC

This brochure provides information about Best Life Infinity, LLC's qualifications and business practices. If you have any questions about the contents of this brochure, please contact us by phone at 407.312.8184 or by email at eric.jackson@militarysurvivor.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any State Securities Authority.

Additional information about Best Life Infinity, LLC is also available at the SEC's website www.adviserinfo.sec.gov (select "investment adviser firm" and type in our firm name). These results will provide you both Part 1 and 2 of our Form ADV.

Registration with the SEC does not imply any level of skill or training. The oral and written communications we provide to you, including this Form ADV Part 2 A ("brochure"), are for you to evaluate us. Please use this information as factors in your decision to hire us or to continue our business relationship.

ITEM 1 – COVER PAGE ADV PART 2 A

March 31, 2023 CRD#: 312448
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ITEM 2 – MATERIAL CHANGES

This brochure dated March 31, 2023, has been prepared by Best Life Infinity, LLC to meet SEC requirements. In the future, this section of the brochure will address only those “material changes” that have been incorporated since our last delivery or posting of this document on the public disclosure website (IAPD) www.adviserinfo.sec.gov.

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ITEM 4 – ADVISORY BUSINESS

Firm Description

Best Life Infinity, LLC ("BLI") was established in 2022. Our office is located in Colorado Springs, Colorado. The firm's principal and CEO is Eric Christopher Jackson, CFP®, ChFC, (CRD #: 4800296). The firm's Chief Compliance Officer is Magan Kaur Zavislak (CRD#: 6370908).

Types of Advisory Services

Investment Management

BLI offers a variety of investment advisory services to our clients. We work with our clients to identify their investment goals and objectives as well as risk tolerance in order to create an initial portfolio allocation designed to complement our clients' financial goals and objectives. Portfolios typically consist of mutual funds, separate account manager portfolios, equities, bonds and options. Each portfolio will be initially designed to meet a particular investment goal, which BLI has determined to be suitable to our client's circumstances.

Financial Planning

BLI offers financial planning services for our clients. These services involve gathering all information necessary to provide you with appropriate and agreed upon services. BLI analyzes all of your assets, liabilities, goals, and objectives which may include one or more of the following:

- cash flow planning;
- tax planning;
- budgeting;
- risk tolerance review;
- education funding;
- retirement planning;
- investment analysis; and
- estate planning.

Military Survivors

We also provide specialized services to Military Survivors, which include families of fallen Military Heroes as well as Combat Veterans. Many benefits, resources, tax laws and programs apply uniquely to these special families. In many instances, we receive third party funding or our associates donate time or accept reduced rates to be able to provide low or no cost financial planning to Military

Survivors either on a short or a long term basis. We also offer reduced rates to Military Survivors for investment management services.

Retirement Rollovers & Conflicts of Interest:

If we make recommendations or provide advice related to a retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts.

In the event we recommend a client rollover their retirement plan assets into an account to be managed by our firm or (where applicable) recommend the purchase of a retail investment product, such a recommendation creates a conflict of interest because we will be compensated if you follow our recommendation.

To manage this conflict, we operate under a special ERISA rule relating to retirement assets that requires us to act in your best interest and not put our interests ahead of yours.

Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

While not always the case, a client or prospective client leaving an employer typically has the below four options regarding an existing retirement plan:

1. Retain the assets in the former employer's plan;
2. Rollover the assets to a Traditional IRA or Roth IRA;
3. Rollover the assets to the plan of a new employer; or
4. Receive a cash distribution.

Deciding which of the above options are right for you can be a complex process. For that reason, we will discuss each option after we conduct a careful analysis. Additionally, we provide a written

"Retirement Advice Disclosure" to our clients to educate you so you can make a good decision. Please let us know if you did not receive the above disclosure so we can provide it to you.

Client Tailored Relationships and Restrictions

As a fiduciary, BLI always acts solely in your best interests. We determine the best portfolio for each client based on their hopes, goals, dreams, age, time horizon, risk tolerance, and investable assets. You may make requests or make suggestions regarding the investments made in your portfolio. Restrictions on trading which, in our opinion, are not in your best interest cannot be honored and if forced may result in the termination of our agreement.

Wrap Fee Program

BLI does not sponsor nor provide portfolio management services to a wrap fee program.

Assets under Management (AUM)

As we are a newly registered firm with the SEC, BLI currently manages no assets.

ITEM 5 – FEES AND COMPENSATION

Fee Schedules

The BLI charges fees in various formats based on the service provided. Each investment advisor representative ("representative") is paid fees based on a customized fee schedule that may be more or less that can be had with other parties or other representatives. Clients engaging BLI for various services may be subject to a combination of these fees. Fees are negotiable. BLI and its representatives may charge a lesser or no fee to certain accounts for certain services after considerations including but not limited to future assets managed, value of assets managed, account composition, household accounts, client negotiations, etc.

Financial Planning Fees

Each advisor's services vary and may range from a targeted plan to a comprehensive plan. As such, fees will vary based on the complexity of the plan, time with the client, and advisor's experience among other considerations.

If hourly fees are charged, the fee shall be no more than \$375 per hour. When a flat fee is agreed upon and charged, it will vary depending on the services to be provided. When fees in excess of \$1,200 are collected the services agreed upon shall be delivered within six months.

Investment Management Fees

Investment Management fees are assessed for the management of assets whether provided directly by the representative or by selecting third party money managers. Third party money managers have their own fees which are you must pay in addition to our investment advisory fees.

The fees, when assessed as a percent of assets, range from 0.375% to 2% when utilizing 3rd party money manager strategies. Clients are billed quarterly in advance. Deposits or withdrawals greater than \$10,000 will be billed or refunded on a prorated basis. All deposits or withdrawals related to the initiation or termination of an advisory relationship will be billed or refunded on a prorated basis regardless of value. Fee calculations are based on calendar days. All accounts for a client are aggregated if breakpoints are included in your fee structure.

In the case where a flat fee is charged for management of assets, the fee shall be billed quarterly, in advance, and will not exceed \$24,000 annually. For quarters that include the initiation or termination of an advisory relationship the quarterly fee will be prorated based on calendar days and the client will be billed or refunded as appropriate.

When assets are placed with third party money managers, BLI's normal investment management fees are applicable as stated above. In addition, the third party money manager will assess their fee. When a third party money manager is selected, you will be given a copy of their ADV Part 2A and any other disclosure documents needed, which describes their fees and expenses.

Finally, BLI also offers use of third party portfolio models, some of which have additional fees that will be disclosed at the time of placement.

Payment of Fees

Client fees are due promptly after the invoice is presented.

Financial Planning fees are typically paid by check or with credit card at engagement, at delivery of services, or 50% at engagement with the balance due at delivery of services, and occasionally in arrears. Hourly fees are billed at the end of the month they were incurred.

Investment Management fees will be deducted directly from each of your accounts proportionally based on the total fee, unless accounts are held away, in which fees will be billed directly to client.

1. When we withdraw fees from your account at the custodian we will send you an invoice prior to submitting the fees to the custodian. The custodian
2. sends you quarterly, at minimum, statements showing all disbursements, including our fees.
3. We have received authorization from you to be paid directly from your accounts held at the custodian.

Termination

BLI or our clients can terminate our agreement at any time with or without cause. Unearned fees will be refunded to client by check payment. When an agreement is terminated, all assets may need to be transferred from the current custodian. You will be responsible for paying all fees including full quarter custodial administrative fees, account closure fees, mutual fund fees and all trading costs due to the termination. The custodian may assess additional fees for transfer of illiquid investments. If there is insufficient cash in the account, the liquidation of some securities may be used to pay the fees. Prior to termination of an agreement, we can provide a good faith estimate of these fees

Third Party Fees

You are responsible for the payment of all third party fees (i.e. custodian fees, mutual fund fees, 12b-1 fees, transaction fees, etc.). Those fees are separate and distinct from the fees we charge.

All brokerage commissions, stock transfer fees, and other similar charges incurred in connection with transactions for the account will be paid out of the assets in the account and are in addition to the investment management fees paid to us. While we take measures to ensure the fees charged are accurate, it is your responsibility to ensure the amount of fee charged is correct. In addition to statements sent by us, you will receive statements directly from these brokers, custodians or mutual

funds or other investments you hold. We strongly urge you to compare these statements for accuracy.

Other Investment Compensation

BLI does not accept commission for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

A performance based fee of 20% (15% for Military Survivors) of all dividends, distributions, interest and covered call net proceeds generated during each calendar is available to Clients who meet the definition of a "Qualified Client." A Qualified Client is a natural person having a net worth, and where applicable including assets held jointly with a spouse, of more than \$2.2 million at the time the Account is opened or for whom, after opening this Account, total assets under management will exceed \$1.1 million.

ITEM 7 – TYPES OF CLIENTS

BLI generally provides financial planning and/or investment management services to individual investors and families, including high net worth individuals having over \$1,000,000 in assets. Each advisor representative determines their own minimum account or relationship size. Usually, the recommended minimum is \$100,000; however, exceptions maybe made on a case-by-case basis.

We also provide specialized services to Military Survivors, which include families of fallen Military Heroes as well as Combat Veterans. Many benefits, resources, tax laws and programs apply uniquely to these special families, and we strive to continually update our knowledge base and experience to provide the best service possible.

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

Analysis

BLI's representatives generally engage in methods based in modern portfolio theory, macroeconomic analysis, and fundamental analysis where the focus is on proper asset allocation and diversification through exposures to several asset classes.

Sources of information may include newspapers and magazines (such as the Wall Street Journal or Financial Times), Morningstar reports, prospectuses, independent research reports (such as Argus, S&P, or Reuters), SEC filings and annual reports.

Investment Strategies

Examples of specific strategies include:

- passive investment management;
- active investment management;
- preservation of income;
- long term growth;
- short term growth;
- options strategies; and
- third party models.

Securities utilized to accomplish the above may be exchange traded products such as exchange traded funds ("ETF") or exchange traded notes ("ETN"), mutual funds, separate account manager portfolios, equities, and bonds.

Risk of Loss

All investments include a risk of loss. In addition, as recent global and domestic economic events have indicated, performance of any investment is not guaranteed. As a result, there is a risk of loss of the assets we manage that may be out of our control. We use our best efforts and expertise to manage your assets. However, we cannot guarantee any level of performance or that you will not experience financial loss.

BLI will use our best judgment and good faith efforts in rendering services to you. We cannot warrant or guarantee any particular level of account performance, or that the account will be profitable over time. Not every investment decision or recommendation made by us will be profitable. You assume all market risk involved in the investment of account assets and understand that investment decisions made for this account are subject to various market, currency, economic,

political and business risks. Except as may otherwise be provided by law, we will not be liable to you for (a) any loss that you may suffer by reason of any investment decision made or other action taken or omitted in good faith by BLI with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; (b) any loss arising from our adherence to your instructions; or (c) any unauthorized act or failure to act by a custodian of your account. Nothing in this document shall relieve us from any responsibility or liability we may have under state or federal statutes.

Long and short term purchases and options may be used to implement certain strategies of asset allocation and attempting to control risk. We attempt to minimize transactions when possible in an effort to reduce transaction costs, taxes, and other potential expenses.

Since the BLI offers a wide range of services through many representatives to clients with a multitude of goals, the Advisor may effect transactions in many different securities with various risks and attributes. Investing involves the risk of loss, including principle, which the client should be prepared to assume.

Risks Associated with specific Security Types

BLI aims to deliver widely diversified portfolios to clients that may contain securities that involve greater risk than others. Generally, these securities account for smaller portions of the portfolio as a whole. Below is an informational listing of some, but not all, asset classes that are traded and some of their attributes and/or the concerns regarding trading as an individual trade or a block, especially if the block is not filled.

Trading activity in small cap and international securities is often more volatile and less liquid than that of large cap domestic securities. This may affect the price the client receives in the marketplace when independent or multiple transactions are made. Such securities may be difficult to dispose of at an acceptable price or in a short timeframe when a client terminates an account or desires to raise cash.

Trading fixed income products is often hindered by illiquid markets and, in many cases, the absence of an exchange with market makers. Often there is only a limited quantity of an issue available for purchase or sale at a given time making block trading difficult or impossible. The bonds may be allocated to a single account, at the representative's discretion, when an account has a unique investment mandate, a specific need, or the allocation completes the position requirement. Alternatively, the purchase may be allocated at random. When it is infeasible to allocate fixed income securities across all accounts needed, an issue (potentially from a different issuer) of similar term, rating, credit enhancement, and structure shall be sought to fulfill the needs of the balance of accounts in a reasonable time frame to identify such an issue. Such securities may be difficult to dispose of at an acceptable price or in a short timeframe when a client terminates an account or desires to raise cash.

Stock Options and index options in a covered call strategies reduce the potential upside of the underlying securities. In addition, if client needs to liquidate securities, the options must first be closed and may require cash to close prior to liquidating underlying securities. This may also require the liquidation of options at unfavorable prices compared to original plans. Options may also have low liquidity and may have high bid/ask spreads causing less favorable pricing.

Clients are advised, all investments incur risks including the following: Loss of Principal Risk, Interest-rate Risk, Market Risk, Inflation Risk, Currency Risk, Reinvestment Risk, Business Risk, Liquidity Risk, and Financial Risk.

ITEM 9 – DISCIPLINARY INFORMATION

Civil or Criminal Actions

BLI and its managers have never been found guilty, convicted or plead no contest to a criminal or civil action in a domestic, foreign or military court.

Administrative Enforcement Proceedings

BLI and its managers have never been found by the SEC, any other state or federal agency or any foreign regulatory agency to have caused loss of the ability of an investment-related business to do business or been sanctioned, barred or limited in investment-related activities.

Self-Regulatory Organization Enforcement Proceedings

BLI and its managers have never been found by a self-regulatory agency to have caused loss of the ability of an investment-related business to do business. Additionally, BLI and its managers have never been found in violation of self-regulatory agencies rules such that they were barred, suspended, limited in advisory functions or fined.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Broker Dealers and Registered Representatives

BLI is not registered as a broker-dealer and our employees are not registered representatives of any broker-dealer.

Registration as a Futures Commission Merchant, Pool Operator, or a Commodity Trading Advisor

Neither BLI nor our employees hold any of the above registrations.

Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

BLI will disclose any material conflict of interest relating to our firm, our representatives, or any of our employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

Selection of Other Advisors and How this Advisor is Compensated for those Selections

Representatives may recommend and hire outside third party money managers. When doing so, BLI does not receive any compensation for hiring third party money managers. Clients may be assessed a separate fee for the third party money manager's services based on the third party's schedule which will be reviewed and disclosed.

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

Code of Ethics Description

BLI has adopted a Code of Ethics that governs a number of potential conflicts of interest we have when providing our advisory services to you. This Code of Ethics is designed to ensure we meet our fiduciary obligation to you and to stress the importance of a culture of compliance within our firm.

An additional benefit of our Code of Ethics is to detect and prevent violations of securities laws, including our obligations we owe to you.

BLI's Code of Ethics is comprehensive, is distributed to each employee at the time of hire, and annually thereafter (if there are changes). We also supplement the Code of Ethics with annual training and on-going monitoring of employee activity. A complete copy of our Code of Ethics will be supplied to you, free of charge, if you request it.

BLI's Code of Ethics includes the following:

- Requirements related to the confidentiality of your personal, business and financial information
- Prohibitions on insider trading (if we are in possession of material, non-public information)
- Reporting of gifts and business entertainment
- Reporting (on an on-going and quarterly basis) all personal securities transactions (what we call "reportable securities" as mandated by regulation)
- On an annual basis, we require all employees to re-certify to our Code of Ethics, identify members of their household and any account to which they have a beneficial ownership (they "own" the account or have "authority" over the account), securities held in certificate form and all securities they own at that time

Participation or Interest in Client Transactions

BLI, or its employees, may buy and sell some of the same securities for our own accounts that we buy and sell for our clients. We will always buy or sell from our clients' accounts before we buy or sell from our accounts. In some cases BLI, or its employees, may buy or sell securities for our own accounts and not for clients' accounts, as it may not meet the objectives or plans for the client.

BLI will always maintain full disclosure with our clients so that you can make informed decisions. We will always evaluate our activity from the view of our clients to ensure that any and all required disclosures are made. For example, we will disclose anything that would cause you to be unfairly influenced to make any decision regarding actions or inactions in your account.

ITEM 12 – BROKERAGE PRACTICES

Selecting Brokerage Firms

As part of our services, BLI will recommend a broker-dealer. We have selected our broker-dealers based on price, reliability, speed of processing, tools and “best execution” in addition to other considerations. And while you are not required to effect transactions through any broker-dealer recommended by us, we feel we have made our selections based on a totality of benefits they offer.

BLI may purchase software, tools, training programs or seminar services from our broker-dealer. Additionally, broker-dealers may provide services, tools or other non-financial benefits to us as a benefit for using the broker-dealer’s services. However, we endeavor at all times to put the interests of our clients first. You should be aware, however, that the receipt of the types of benefits discussed above can create a potential conflict of interest by influencing our choice of a broker-dealer.

To avoid creating a possible conflict of interest in recommending broker-dealers, we have established the following restrictions in order to ensure its fiduciary responsibilities:

- BLI adheres to our Code of Ethics as outlined in Item 11 above.
- If BLI receives separate compensation for transactions, we will fully disclose them.
- BLI emphasizes the unrestricted right of you to select and choose your own broker or dealer.
- BLI will always act in accordance with all applicable federal and state regulations governing registered investment advisory practices.

Soft Dollars

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by Advisor from or through a broker-dealer in exchange for directing client transactions to the broker-dealer. As permitted by Section 28(e) of the Securities Exchange Act of 1934, Advisor receives economic benefits as a result of commissions generated from securities transactions by the broker-dealer from the accounts of

Advisor. These benefits include both proprietary research from the broker and other research written by third parties.

A conflict of interest exists when Advisor receives soft dollars. This conflict is mitigated by the fact that Advisor has a fiduciary responsibility to act in the best interest of its clients and the services received are beneficial to all clients.

Directed Brokerage

BLI does not allow directed brokerage accounts.

Aggregation of Trades and Block Trading

Depending on the advisor representative and nature of the advisory relationship, transactions may be either executed independently or may be entered into a block, or batch trade, where all eligible clients will receive the same execution price. Note the transactions fees levied by custodians for execution services may be a flat or minimum rate; therefore, the per-share cost may vary per client and account. Generally, transactions will be effected independently. Independently executed trades will potentially receive prices different than those of other clients and those differences may be substantial depending on the timing of order entry. Independent transactions may be the result of use of a client directed broker, specific client reviews, or use of a non-block trading system, even if such is available. Individual trades such as mentioned are subject to receiving differing prices than similar orders entered in the same day. Executions related to the establishment of an account, termination of an account, addition of funds, and/or withdrawal of funds are likely to be traded independently and thus may not receive like transactions to other accounts.

The advisor may, but is not required, to block or batch trades. A block trade will be used when the representative intends to trade the same security on the same side for several accounts at approximately the same time. If an advisor uses a block trade to execute a trade for multiple clients it shall be allocated as if each client had separate orders then aggregated to create the block. The percentage of the client's portfolio being transacted may differ substantially, with some accounts receiving no shares, due to the varying investment goals, client needs, and restrictions that may have been requested among other factors. If a block trade is partially executed, meaning the total shares attempted were not executed, the allocation to each client will be reduced proportionally. In such case as the reduced allocation to a client account is deemed by the representative to be too small, not cost effective, and/or of minimal impact to the portfolio the representative may use his or her discretionary authority to allocate those shares to other client accounts as if the order was not entered on said client's behalf. Alternatively, if only a small percentage of the original order is

executed, the smaller positions or accounts may be filled with shares from the reduced execution based on the advisors discretion regarding the potential affect a minimal amount of shares may have on a particular account. Advisor representatives are to make every effort to distribute all shares in the proportions as originally planned. When a representative is entering a block trade with the custodian in the same issue and side and there are trades to be executed away from the custodian, the block shall be sent to the market first. Subsequent independent transactions may not receive the same price as discussed above.

ITEM 13 – REVIEW OF ACCOUNTS

Periodic Reviews

All Client accounts are reviewed quarterly to check for consistency with the investment strategy and performance. Reviews are conducted by Eric Christopher Jackson, CFP®, ChFC.

Review Triggers

Client accounts may be reviewed more frequently should market conditions warrant. Review triggers include a change in market conditions, a change in client situation, a change of a guideline, tax considerations, large deposits or withdrawals, loss in confidence in corporate management objectives or other new investment information.

Regular Reports

All clients 'assets are held by qualified custodians. The custodians provide account statements directly to clients at their address of record at least quarterly. Some representatives may opt to distribute performance reports quarterly. Clients are urged to compare the account statements received directly from their custodians to reports provided by BLI to determine accuracy.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

Economic Benefits Provided by Third Parties for Advice Rendered to Clients

Other than soft dollars discussed in Item 12 above, BLI does not receive economic benefits from third parties for the advice we render to our clients.

Compensation to Non-Advisory Personnel for Client Referrals

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

ITEM 15 – CUSTODY

BLI does not maintain custody of client assets. In certain instances, our clients may grant written execute a standing letter of authorization (SLOA) to a qualified custodian which may result in BLI having custody of client assets. In such instances, BLI has limited authority to withdraw client assets upon our instruction to the custodian. To ensure clients' interests are protected, BLI meets the requirements as set forth in SEC guidance under §275.206(4)-2 regarding this limited authority.

When SLOAs are used the following conditions must be met:

- i. The client provides an instruction to the custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- ii. The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- iii. The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
- iv. The client has the ability to terminate or change the instruction to the client's qualified custodian.
- v. The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- vi. The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- vii. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

BLI shall have no liability to the client for any loss or other harm to any property in the account, including any harm to any property in the account resulting from the insolvency of the custodian or any unauthorized acts of the agents or employees of the custodian and whether or not the full amount or such loss is covered by the Securities Investor Protection Corporation ("SIPC") or any

other insurance which may be carried by the custodian. The client understands that SIPC provides only limited protection for the loss of property held by a broker-dealer. As a fiduciary, BLI will always act in the client's best interests and in doing so, the above does not limit or modify that duty to our clients for accuracy.

ITEM 16 – INVESTMENT DISCRETION

We provide investment management services on a discretionary basis. This allows BLI to determine and execute a course of action in a client's portfolio without first consulting you. Discretionary authority facilitates trading in your accounts on your behalf so we may promptly implement an investment strategy. The standard BLI Investment Advisor Contract and custodian application forms include a limited power of attorney to conduct discretionary trading in client accounts. We may facilitate a non-discretionary account on a case-by-case basis determined by the advisor servicing the relationship.

ITEM 17 – VOTING CLIENT SECURITIES

BLI does not vote proxies. Clients will receive proxies directly from the issuer and should directly contact the issuer with questions.

ITEM 18 – FINANCIAL INFORMATION

Balance Sheet

BLI does not solicit prepayment of more than \$1,200 in fees per client six months in advance.

Financial Conditions

BLI has no financial issues that could impair our ability to carry out our fiduciary duty to our clients.

Bankruptcy Petition

Neither BLI, nor its management, have been subject of a bankruptcy filing in the past ten years.