



Cornermen Financial

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Cornermen Financial, LLC. If you have any questions about the contents of this brochure, please contact us at (210) 702-3961 or by email at jay@cornemenfinancial.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.

Additional information about Cornermen Financial, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Cornermen Financial, LLC's CRD number is: 323179.

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Registration as an investment adviser does not imply a certain level of skill or training.

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Item 2: Material Changes

Cornermen Financial, LLC has made the following material change;

- Updated item 4 to reflect the discretionary AUM.
- Updated item 4 to disclose the SIMC Managed Account Solutions program.
- Updated item 12 to disclose soft dollar benefits.
- Updated item 14 to reflect economic benefits received by SEI relationship.

Item 3: Table of Contents

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

Item 4: Advisory Business

A. Description of the Advisory Firm

Cornermen Financial, LLC (hereinafter “Cornermen”) is a Limited Liability Company organized in the State of Texas. The firm was formed in April 2013, and the principal owners are Jay Howard and Logan W. Dietel.

B. Types of Advisory Services

Portfolio Management Services

Cornermen offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Cornermen creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

Cornermen evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Cornermen will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Cornermen seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Cornermen’s economic, investment or other financial interests. To meet its fiduciary obligations, Cornermen attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Cornermen’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Cornermen’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Cornermen provides portfolio management services to clients using model asset allocation portfolios or customized portfolios tailored to the individual needs and objectives of the client. Clients will retain individual ownership of all securities. The implementation of these portfolios is accomplished by using either the SEI Asset Management Program or through Individual Portfolio Management.

SEI's Asset Management Program:

Cornermen may choose to invest its clients' assets into model portfolios of mutual funds and exchange-traded funds ("ETFs") created by SIMC. This includes the SEI Asset Allocation Models ("SEI Asset Allocation Models") that consist of allocations to SEI Funds and SEI ETFs and the Independent Funds Models Program ("Independent Funds Models Program") which consists of model portfolios of allocations to certain families of third-party mutual funds or ETFs. Under the SEI Asset Allocation Models and the Independent Funds Models Program, SIMC provides non-discretionary services to Cornermen through the publication of investment models consisting of allocations to these different funds (i.e., SEI Funds, SEI ETFs, third-party funds, or third-party ETFs) allocated to the models. Specifically, SIMC: (1) makes available the models, developed and periodically updated by SIMC designed to achieve the model's stated investment objective or goal based upon SIMC's capital market assumptions and any other criteria that SIMC, in its sole discretion, determines is relevant; and (2) periodically publishes for consideration by firm revisions to a model's percentage asset allocations among the underlying SEI Funds, SEI ETFs, third-party funds, or third-party ETFs, or adds, removes, or otherwise changes the individual SEI Funds, SEI ETFs, third-party funds, or third-party ETFs underlying an existing model.

SIMC and its affiliates earns fees from the SEI Funds and SEI ETFs, which costs are indirectly borne by Clients invested in these models. As a result, SIMC does not charge Cornermen or its clients a direct fee for the use of the SEI Asset Allocation Models, although SEI Private Trust Company ("SPTC"), the custodian to the Client and an affiliate of SIMC, will charge a custodial platform fee on Client assets invested in SEI ETF products. In the Independent Funds Model Program, SIMC and its affiliates (including SPTC) charge direct fees that will be assessed to Clients.

In the Sub-Advised Program, Cornermen has hired SEI Investments Management Corporation ("SIMC"), an SEC-registered investment advisor, to act as the sub-advisor when using the SIMC Managed Account Solutions. The fundamental difference from SIMC "standard" Managed Account Solutions program is that under this program SIMC makes available the various managed account strategies to Cornermen directly and SIMC does not act as co-advisor to the Client. In other words, SIMC has no contractual relationship with the Client, which SIMC does when working with Advisors in the standard co-advised managed accounts program model. Accordingly, in the Sub-Advised Program, SIMC does not: (1) review client-level suitability of the Managed Account Solutions selections with the Clients, and (2) does not require end-client (investor) signatures for investment strategy changes. In order to participate in the Sub-Advised Program, Cornermen must either have discretionary authority with Clients or have Clients' prior agreement to execute all investment selections.

Financial Life Planning

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

Services Limited to Specific Types of Investments

Cornermen generally limits its investment advice to mutual funds, hedge funds, private equity funds and ETFs, stocks, and bonds. Cornermen may use other securities as well to help diversify a portfolio when applicable.

Written Acknowledgement of Fiduciary Status

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest 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.

C. Client Tailored Services and Client Imposed Restrictions

Cornermen offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client's current situation (income, tax levels, and risk tolerance levels). Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees and transaction costs. Cornermen does not participate in wrap fee programs.

E. Assets Under Management

Cornermen has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$104,414,761	\$0	January 2023

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

Total Assets Under Management	Annual Fees
All Assets	1.00%

The balance in the client's account on the last day of the billing period is used to determine the market value of the assets upon which the advisory fee is based. These fees are generally negotiable, and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of Cornermen's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

Accounts held at SEI Private Trust Company ("SPTC") are billed quarterly in arrears. Our fee is calculated based on End of Period Market Value using each account's market value on the last day of the fee period. Unless otherwise specified in the advisory agreement, Cornermen's fees will be automatically debited from the client's investment account.

Financial Life Planning Fees

Hourly Fees

The negotiated hourly fee for these services is \$300.

Clients may terminate the agreement without penalty, for full refund of Cornermen's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in arrears.

All fees paid to Cornermen for advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders, or those charged to clients by product sponsors or by qualified custodians and sub-advisors. Qualified custodians, such as SPTC, also charge our clients fees for their services. Fees charged by SPTC differ and their fees may be higher or lower than at other qualified custodians.

Payment of Financial Life Planning Fees

Financial planning fees are paid via check.

Hourly financial planning fees are paid in arrears upon completion.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Cornermen. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

Cornermen collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Neither Cornermen nor its supervised persons accept any compensation for the sale of 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

Cornermen does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

Cornermen generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Corporations or Business Entities

There is no account minimum for any of Cornermen's services.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

Cornermen's methods of analysis include Modern portfolio theory.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Monte Carlo Simulation is a risk and decision analysis technique used to evaluate the outcome of portfolios over time using a large number of simulated variables to generate possible future returns.

There are many variables that can affect a financial plan. Two of the most volatile variables are inflation and investment returns, both of which, historically, vary on a daily basis. Even with this knowledge, most financial projections use constant inflation and investment rates over the period of the analysis. The use of these averages is used as a start for the planning process, since the actual values are unknown. Unfortunately, however, this type of analysis illustrates only one outcome, thereby requiring that simulation be used to imitate real-life situations. In order to produce meaningful results, these simulations are processed many times. By varying the rates of return and inflation to simulate the fluctuations that can be experienced in the marketplace, a more realistic reflection of the anticipated ups and downs of the investment environment is presented.

In order to create a Monte Carlo simulation model, historical performance of the securities market must be analyzed. This analysis does not utilize historical data for any specific securities. Rather, it uses the historical data for broad asset classes, such as “Small Cap. Equities” and “Long Term Bonds.” This analysis takes into account not only the historical values of various investment factors (prices, inflation, etc.), but also the interrelation of these values and the correlation between investment periods. The econometric modeling method is used to generate the capital market data used in the simulations. This involves modeling the movements of yields through time and then layering on various equity risk information to derive stock returns. This results in many economies being simulated for a given time period.

These multiple simulations produce a range of results. These results are then analyzed and probabilities are associated with the outcome. Due to the random nature in which the simulations are generated and the regular updating of historical asset class data, the results may vary with each use and over time, even if the underlying assumptions are not changed.

Investment Strategies

Cornermen recommends long term trading and short term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Monte Carlo Simulation: The projections or other information generated by Monte Carlo Simulations regarding the likelihood of various investment outcomes are hypothetical in nature, do not reflect actual investment results and are not guarantees of future results. An investment cannot be made directly into a Monte Carlo Simulation. There are limitations in using a Monte Carlo simulation, including the analysis is only as good as the assumptions, and despite modeling for a range of uncertainties in the future, it does not eliminate uncertainty. The results can be presented various ways, but the ultimate

goal of a Monte Carlo Simulation is to educate and communicate about the uncertainty of the future, so you can make educated decisions about your specific situations.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Selection of Other Advisers: Although Cornermen will seek to select only money managers who will invest clients' assets with the highest level of integrity, Cornermen's selection process cannot ensure that money managers will perform as desired and Cornermen will have no control over the day-to-day operations of any of its selected money managers. Cornermen would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the long-term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized

participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF’s shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

Hedge funds often engage in leveraging and other speculative investment practices that may increase the risk of loss; can be highly illiquid; are not required to provide periodic pricing or valuation information to investors; May involve complex tax structures and delays in distributing important tax information; are not subject to the same regulatory requirements as mutual funds; and often charge high fees. In addition, hedge funds may invest in risky securities and engage in risky strategies.

Private equity funds carry certain risks. Capital calls will be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to a total loss of investment.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither Cornermen nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

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

Neither Cornermen nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

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

Jay Howard is an independent licensed insurance agent and is 50% owner of Advisecore, LLC. This activity creates a conflict of interest since there is an incentive to recommend insurance products based on commissions or other benefits received from the insurance company, rather than on the client's needs. Additionally, the offer and sale of insurance products by supervised persons of Cornermen are not made in their capacity as a fiduciary, and products are limited to only those offered by certain insurance providers. Cornermen addresses this conflict of interest by requiring its supervised persons to act in the best interest of the client at all times, including when acting as an insurance agent. Cornermen periodically reviews recommendations by its supervised persons to assess whether they are based on an objective evaluation of each client's risk profile and investment objectives rather than on the receipt of any commissions or other benefits. At no time will there be tying between business practices and/or services (a condition where a client or prospective client would be required to accept one product or service conditioned upon the selection of a second, distinctive tied product or service). No client

is ever under any obligation to purchase any insurance product. Insurance products recommended by Cornermen's supervised persons may also be available from other providers on more favorable terms, and clients can purchase insurance products recommended through other unaffiliated insurance agencies. He spends approximately 10% of his time on this outside business activity.

Jay Howard owns a 501(c)(3) Financial Education Institute which hosts a class; 'The Guide to Retirement Planning'. Jay Howard teaches the class in office or through ISD in San Antonio Area. No revenue generated from this outside business activity. He spends approximately 10% of time spent on this outside business activity.

Jay Howard is a sports broadcaster on an ad-hoc basis for Play-by-Play sports. He spends approximately 1% of time on this outside business activity.

Logan W. Dietel is an independent licensed insurance agent and is 50% owner of Advisecore, LLC. This activity creates a conflict of interest since there is an incentive to recommend insurance products based on commissions or other benefits received from the insurance company, rather than on the client's needs. Additionally, the offer and sale of insurance products by supervised persons of Cornermen are not made in their capacity as a fiduciary, and products are limited to only those offered by certain insurance providers. Cornermen addresses this conflict of interest by requiring its supervised persons to act in the best interest of the client at all times, including when acting as an insurance agent. Cornermen periodically reviews recommendations by its supervised persons to assess whether they are based on an objective evaluation of each client's risk profile and investment objectives rather than on the receipt of any commissions or other benefits. At no time will there be tying between business practices and/or services (a condition where a client or prospective client would be required to accept one product or service conditioned upon the selection of a second, distinctive tied product or service). No client is ever under any obligation to purchase any insurance product. Insurance products recommended by Cornermen's supervised persons may also be available from other providers on more favorable terms, and clients can purchase insurance products recommended through other unaffiliated insurance agencies. He spends approximately 15% of his time on this outside business activity

Logan W. Dietel owns a 501(c)(3) Financial Education Institute which hosts a class; 'The Guide to Retirement Planning'. Logan W. Dietel teaches the class in office or through ISD in San Antonio Area. No revenue generated from this outside business activity. He spends approximately 10% of time spent on this outside business activity.

Logan W. Dietel is Trustee/Owner of Dietel Ranch located in Harper, TX. He spends approximately 1% of time on this outside business activity.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections
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Cornermen provides portfolio management services to clients using model asset allocation portfolios or customized portfolios tailored to the individual needs and objectives of the client. Clients will retain individual ownership of all securities. The implementation of these portfolios is accomplished by using either the SEI Asset Management Program or through Individual Portfolio Management. Cornermen has a Sub-Advisor Agreement with SEI Investments Management Corporation ("SIMC"), a registered investment advisor affiliated with SPTC located in Oaks, Pennsylvania. This agreement allows Cornermen's to allocate client assets for participation in SIMC's Sub-Advised Program. Cornermen is responsible to determine whether participation in the program is appropriate for our clients. Under the program, SIMC provides discretionary investment management services to Cornermen and makes available investment strategy models of SIMC or investment managers appointed by SIMC. These models seek to achieve particular investment goals and are not tailored to individual clients. Cornermen may allocate client assets to one or more of SIMC's models which match a client's objectives. SIMC then invests the allocated funds in accordance with the selected models as updated from time to time by SIMC or investment managers appointed by SIMC. In most cases, SIMC will implement those models and execute transactions; in others, the investment manager will do so. SIMC charges Cornermen an investment management fee for participation in the program. Cornermen has instructed SPTC to operationally facilitate the deduction of the investment management fees directly from Cornermen's clients' accounts held at SPTC. Other transaction costs are also charged to the client, including without limitation execution charges imposed by unaffiliated broker/dealers or exchanges, wire transfer fees, auction fees, and transfer taxes. Clients with assets allocated to the program are subject to certain risks, including the investment manager implementing its model for its other accounts before implementing it for our clients. In that case, securities may be traded by our clients at prices different than those obtained by the manager's other clients. The risk of price deviations is greater for large orders and thinly traded securities. Additionally, performance of our client's investments in a model may deviate from the performance of other accounts in such models or those managed by SIMC or the investment manager.

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

A. Code of Ethics

Cornermen has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Cornermen's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

Cornermen does not recommend that clients buy or sell any security in which a related person to Cornermen or Cornermen has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Cornermen may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Cornermen to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Cornermen will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of Cornermen may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Cornermen to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, Cornermen will never engage in trading that operates to the client's disadvantage if representatives of Cornermen buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on Cornermen's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Cornermen may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Cornermen's research efforts. Cornermen will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Cornermen does not maintain custody of your assets that we manage although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15 – Custody, below). Your assets must be maintained in an account at a “qualified custodian.” We recommend that our clients use SEI Private Trust Company (“SPTC”), a limited purpose federally registered savings association supervised by the Office of the Comptroller of the Currency, as the qualified custodian. We are independently owned and operated and not affiliated with SPTC. SPTC will hold your assets and buy and sell securities when we instruct them to. While we recommend that you use SPTC as custodian, you will decide whether to do so and open your account with SPTC by entering into an account agreement directly with them. We do not open the account for you. Even though your account is maintained at SPTC, we can still use other brokers to execute trades for your account, as described in the next paragraph.

1. Research and Other Soft-Dollar Benefits

Cornermen may enter into soft dollar arrangements through which it may receive research, products, or other services from its broker/ dealer or another third-party in connection with client securities transactions (“soft dollar benefits”) within (but not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client’s transactions paid for it, and Cornermen does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. Cornermen benefits by not having to produce or pay for the research, products or services, and Cornermen will have an incentive to recommend a broker dealer based on receiving research or services. Clients should be aware that Cornermen’s acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

Cornermen receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

Cornermen will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

If Cornermen buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, Cornermen would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for

all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. Cornermen would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for Cornermen's advisory services provided on an ongoing basis are reviewed at least Annually by Jay Howard, CCO and Logan W. Dietel, CFO, with regard to clients' respective investment policies and risk tolerance levels. All accounts at Cornermen are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Jay Howard, CCO and Logan W. Dietel, CFO. Financial planning clients are provided a one-time financial plan concerning their financial situation. Cornermen will update a financial plan annually, during the annual review, to ensure the client is still "on-plan" and to make any necessary changes to the Plan, should the client have new/changed goals or life situations. Clients may request additional plans or reports for a fee.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, Cornermen's services will be reviewed on an annual basis with the client.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of Cornermen's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. SEI will also provide at least quarterly a separate written statement to the client. Cornermen will provide at least annually a separate written statement to the client.

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Cornermen we receive certain services and benefits from SEI Investments Management Corporation and its affiliates ("SEI") to help conduct our advisory business through SEI's Independent Advisor Solutions by SEI business unit ("IAS"). Investments we manage for our clients working with SEI are held in custodial accounts at SEI Private Trust Company ("SPTC") pursuant to an agreement signed by each client with SPTC to receive custodial services. Accounts held at SPTC are supported through SEI's proprietary platform known as the SEI Wealth PlatformSM, or the "Platform". Cornermen uses the Platform and other technology provided by SEI or paid for by SEI to assist us in both the management of your assets and to support our business. SEI pays a portion of the fee for RedTail, a Client Relationship Management software, utilized by Cornermen.

B. Compensation to Non - Advisory Personnel for Client Referrals

Cornermen does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

Under government regulations, we are deemed to have custody of your assets if you authorize us to instruct SPTC to deduct our advisory fees directly from your account. SPTC maintains actual custody of your assets. You will receive account statements directly from SPTC at least quarterly. They will be sent to the email or postal mailing address you provided to SPTC. You should carefully review those statements promptly when you receive them. We also urge you to compare SPTC's account statements with the periodic account statements you will receive from us.

Cornermen has the ability to instruct SPTC on certain transfers or withdrawals from your account(s) at SPTC. Specifically, Cornermen may instruct SPTC to distribute assets via check to your name and address of record on file with SPTC. With your written permission on file with SPTC, Cornermen may transfer assets to a bank account or account held at another custodian provided the account is in your name. All third-party distributions from SPTC must be signed by you. Cornermen does not have authority to instruct SPTC to distribute assets from your account at SPTC to a third-party.

Item 16: Investment Discretion

Cornermen provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Cornermen generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

Item 17: Voting Client Securities (Proxy Voting)

Cornermen will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

Cornermen neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither Cornermen nor its management has any financial condition that is likely to reasonably impair Cornermen's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

Cornermen has not been the subject of a bankruptcy petition in the last ten years.