Wrap Fee Program Brochure **April 1, 2018**

BEAM ASSET MANAGEMENT, LLC

a Registered Investment Adviser

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This Wrap Fee brochure provides information about the qualifications and business practices of BEAM Asset Management, LLC. If you have any questions about the contents of this brochure, please contact the Firm at the telephone number listed above. 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 the Firm is available on the SEC's website at www.adviserinfo.sec.gov. The Firm is a registered investment adviser. Registration does not imply any level of skill or training.

Item 2. Material Changes

In this Item, BEAM is required to discuss any material changes that have been made to the brochure since the last amendment which was dated March 30, 2017.

The following changes have been processed since the previous filing:

1. BEAM has updated the brochure to reflect discretionary assets under management as of the previous year end, December 31, 2017. The new date of the brochure is now April 1, 2018.

2. As of April 1, 2018, BEAM has done a succession filing with the SEC. Per the notice that was sent to all clients on January 31, 2018, the firm is doing a succession filing from Financial & Investment Management Advisors, Inc. dba BEAM Asset Management (FIMA/BEAM). The organizational structure changed to a limited liability company (LLC), BEAM Asset Management, LLC (BEAM). The new ownership structure of the LLC will be Scott E. Bordelon, A. Larry Lock and Steven M. Hollis.

3. As of October 2017, TD Ameritrade no longer provides any Additional Services to BEAM Asset Management under Item 14.

<u>Important Notice</u>

Under Rule 204-3 of the *Investment Advisers Act of 1940*, BEAM is required to annually offer or deliver to you a copy of our current Form ADV Wrap Fee Program Brochure and provide a copy of our Summary of Material Changes since our last annual update. BEAM's Wrap Fee Program Brochure can be viewed and printed from our website: www. beamasset.com. Click on "Client Center" and then on the "Brochures" link. Then you can click on the applicable brochure to download.

If you would prefer to have a copy mailed to you, please contact our office at (800) 256-5221. A copy will be sent to you within seven days of contact. If you have any questions, please contact your investment adviser representative or send an email to info@fimadvisors.com.

Item 3. Table of Contents

Item 4. Services, Fees and Compensation

For over 30 years, BEAM and its predecessors, Financial and Investment Management Advisors, Inc. (dba BEAM) and Northlake Financial Advisors have served the financial needs of clients seeking personal, comprehensive financial planning and investment management services from advisors with experience. Prior to BEAM rendering any of the foregoing advisory services, clients are required to enter into one or more written agreements with BEAM setting forth the relevant terms and conditions of the advisory relationship (the "Advisory Agreement").

BEAM and its predecessors have been registered as an investment adviser with the SEC since 1985.

The Firm is owned by Scott E. Bordelon, CFP®, AAMS®, BFA™, A. Larry Lock, ChFC and Steven M. Hollis, CFP®. As of December 31, 2017, BEAM had $466,399,449 of assets under management, all of which were managed on a discretionary basis.

While this brochure generally describes the business of BEAM, certain sections also discuss the activities of its Supervised Persons, which refer to the Firm's officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees or any other person who provides investment advice on BEAM's behalf and is subject to the Firm's supervision or control.

Investment and Wealth Management Services

BEAM manages client investment portfolios on a discretionary or non-discretionary basis.

BEAM primarily allocates client assets among various mutual funds, exchange-traded funds ("ETFs"), individual debt and equity securities, options and independent investment managers ("Independent Managers") in accordance with their stated investment objectives.

Where appropriate, the Firm may also provide advice about any type of legacy position or other investment held in client portfolios. Clients may engage BEAM to manage and/or advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance and annuity contracts and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, BEAM directs or recommends the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company or the custodian designated by the product's provider.

BEAM tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. BEAM consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of their portfolios. Clients are advised to promptly notify BEAM if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients may impose reasonable restrictions or mandates on the management of their accounts if BEAM determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts.

Investment Management Fees

BEAM offers investment management services for an annual fee based on the amount of assets under the Firm's management. This management fee generally varies, depending upon the size and composition of a client's portfolio and the type of services rendered. Generally fees range from less than 1% annually to no more than 3% annually. The advisory account Minimum Platform Service Fee (MPSF) is $50 annually per advisory account. The per account MPSF may be waived on a single account(s) provided aggregate MPSF fee for the immediate client family household meets the MPSF of $50 annually per account on an aggregate basis. For example, one household account could cover the MPSF provided the Platform Service Fee is enough in aggregate to meet the minimums for all accounts in the household. The specific fee charged for investment management services is prominently disclosed in the engagement agreement for the client specific investment management plan the client chooses to implement.

The annual fee is prorated and charged quarterly, in arrears or in advance, based upon the method selected in the investment advisory agreement and the market value of the assets being managed by BEAM or the IAR on the last day of the billing period.

If assets are deposited into or withdrawn from an account after the inception of a billing period, the fee payable with respect to such assets is adjusted to reflect the interim change in portfolio value. For the initial period of an engagement, the fee is calculated on a *pro rata* basis. In the event the advisory agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding or unearned portion of the fee is charged or refunded to the client, as appropriate.

Fee Discretion

BEAM may, in its sole discretion, negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship, account retention and pro bono activities.

Additional Fees and Expenses

In addition to the advisory fees paid to BEAM, clients may also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively "Financial Institutions"). These additional charges may include securities brokerage commissions, transaction fees, custodial fees, fees charged by the Independent Managers, margin costs, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (*e.g.*, fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. The Firm's brokerage practices are described at length in the Additional Information Section, below.

BEAM and your IAR do not retain 12b-1 fees paid by funds for either qualified or non-qualified accounts. All 12b-1 fees on accounts are retained by the custodian, TD, Schwab and/or Fidelity. For accounts that are traded with No-Transaction Fee (NTF) mutual funds and/or (NTF) exchange traded mutual funds, any 12b-1 fee is paid to the custodian in lieu of the client paying transaction or trading costs. Where a fund participates in the NTF platform and doesn't have a 12b-1 fee, the custodians generally receive a portion of the fund management or administrative fee. The participation of funds in the NTF platform does not increase the cost of the same share class of the fund to the client. Funds that do not participate in the custodian's NTF platform may have lower expense ratios, which may result in a lower annual cost to the client, however, they generally incur transaction fees and trading costs.

Direct Fee Debit

Clients generally provide BEAM and/or certain Independent Managers with the authority to directly debit their accounts for payment of the investment advisory fees. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to BEAM. Alternatively, clients may elect to have BEAM send a separate invoice for direct payment.

Account Additions and Withdrawals

Clients may make additions to and withdrawals from their account at any time, subject to BEAM's right to terminate an account. Additions may be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or declines to accept particular securities into a client's account. Clients may withdraw account assets on notice to BEAM, subject to the usual and customary securities settlement procedures. However, the Firm generally designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives. BEAM may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, short-term redemption fees, fees assessed at the mutual fund level (e.g., contingent deferred sales charges) and/or tax ramifications.

Commissions and Sales Charges for Recommendations of Securities

Clients can engage certain persons associated with BEAM (but not the Firm directly) to render securities brokerage services under a separate commission-based arrangement. Clients are under no obligation to engage such persons and may choose brokers or agents not affiliated with BEAM. Under this arrangement, the Firm's Supervised Persons, in their individual capacities as registered representatives of Securities America, Inc. ("SAI"), may provide securities brokerage services and implement securities transactions under a separate commission based arrangement. Supervised Persons may be entitled to a portion of the brokerage commissions paid to SAI, as well as a share of any ongoing distribution or service (trail) fees from the sale of mutual funds. BEAM may also recommend no-load or load-waived funds, where no sales charges are assessed. Prior to effecting any transactions, clients are required to enter into a separate account agreement with SAI.

A conflict of interest exists to the extent that BEAM recommends the purchase or sale of securities where its Supervised Persons receive commissions or other additional compensation as a result of the Firm's recommendation. The Firm has procedures in place to ensure that any recommendations made by such Supervised Persons are in the best interest of clients. For certain accounts covered by the Employee Retirement Income Security Act of 1974 ("ERISA") and such others that BEAM, in its sole discretion, deems appropriate, BEAM may provide its investment advisory services on a fee-offset basis. In this scenario, BEAM may offset its fees by an amount equal to the aggregate commissions and 12b-1 fees earned by the Firm's Supervised Persons in their individual capacities as registered representatives of SAI.

Item 5. Account Requirements and Types of Clients

BEAM offers services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and business entities.

Minimum Account Requirements

BEAM may impose minimum account requirements for starting and maintaining an investment management relationship. BEAM has a minimum size account requirement of $75,000 per account (can be aggregated, see below). BEAM imposes a Minimum Platform Service Fee (MPSF) of $50 annually or

$12.50 per quarter (see Investment Management Fees on page 7.). The Firm, in its sole discretion, may reduce or waive its minimum account requirements based upon certain criteria. BEAM may aggregate the portfolios of immediate family members living in one household to meet the minimum portfolio size. For example, a household with three accounts, one at $5,000, another at $10,000 and a third at $525,000 would generally meet the minimum ($5,000 + $10,000 + $525,000 = $540,000 / 3 = $180,000).

Item 6. Portfolio Manager Selection and Evaluation

Methods of Analysis

The Firm endeavors to keep abreast of the general and macroeconomic business conditions, changes in the law, taxation, and various investment and insurance products relevant to its clients. To this end, BEAM reviews business publications, seminars, webinars, economic services, tax services, journals, historical data, computer models, and research materials. These can be prepared by parties other than BEAM, for example, corporate rating services, inspections of corporate and business activities, the research of economists and other materials relevant to BEAM services. In addition, the Firm has access and subscribes to a collection of research and commentary from various economists and market strategists. While BEAM relies on other services and sources, BEAM cannot guarantee their accuracy. In consideration of the breadth, complexity, and speed at which information and rules can change, the Firm seeks to stay abreast of nuances as reasonably as possible.

Investment Strategies

As with most all investments, there is a tradeoff between the risk of a portfolio, and its expected return. With this in mind, many types of investment portfolios are considered and utilized by the Firm. In practice, the main strategies include “asset allocation” and “diversification” based on Modern Portfolio Theory and Post Modern Portfolio Theory, considering behavioral finance.

The Firm has a sliding-scale of asset allocation portfolios based on risk (volatility), expected return, and account type. Allocating resources to different classes of financial assets, such as stocks, bonds, cash, sectors, real estate, and commodities, among others, along with each asset segment’s subdivisions, can generally result in diversification. Diversification can potentially lower certain risks and volatility as different assets can react differently under various environments. Utilizing these strategies, the Firm strives to have a lot of eggs, in a lot of different baskets.

Asset allocation portfolios generally utilize historical data to seek to predict an expected risk and expected return of a particular portfolio, but are constructed with an eye to the future. Licensed software providers assist BEAM in this process. Specific assets within an asset allocation portfolio are generally selected with the objective of potentially increasing long-term total return given the amount of risk taken, commensurate to a client's specific profile, as determined in conjunction with the client's adviser. The Firm's goal with its investment strategy is to strive to exceed the expected return of the asset classes and asset mix utilized, as this would add value for its clients. Nevertheless, past results and expected returns are not a guarantee of the future, and actual returns. Accounts managed using the principals of asset allocation and diversification are not guaranteed and may lose value.

Overall, as part of its supervisory responsibilities, the Firm requires its advisers to operate generally under the key tenets of Modern Portfolio Theory which include asset allocation and diversification, or a method of management that is sufficiently described and understood by the Firm. Investment strategies and portfolios may differ from adviser to adviser, and from client to client, and there is a risk of adverse consequences due to each adviser's investment strategy. Each client brings different beliefs and notions to their relationship with BEAM, and BEAM is sensitive to client needs. Specific client account allocations are determined according to a client's risk tolerance profile. As a result, there may be a departure from some or many of the tenets of Modern Portfolio Theory for a client. Please note, the Firm reserves the right to use discretion in determining whether or not to work with clients that may not be a good fit, due to investing temperament, among other factors.

Certain advisers may employ the following strategies/techniques in the management of your portfolio(s):

- Market Timing
- Sector Rotation
- Concentrated Positions

Market timing is the strategy of making buy or sell decisions of financial assets by attempting to predict future market price movements. The prediction may be based on an outlook of market or economic conditions resulting from technical or fundamental analysis. This is an investment strategy based on the outlook for an aggregate market, rather than for a particular financial asset. The risks include but are not limited to the potential of diminished long-term performance, the potential for loss or decline in investment value that could result from the difficulty in predicting market movement.

Sector rotation is a strategy based on moving investments across business sectors to take advantage of cyclical trends in the overall economy. Sector rotation can be prompted by fundamental changes in the economy or within specific industries, or it can be part of a systematic investment strategy that follows cyclical or seasonal price patterns. The risks include but are not limited to the potential of diminished long-term performance in any one sector, the potential for loss or decline in investment value that could result from the difficulty in predicting sector movement.

A Concentrated Position occurs when an investor owns shares of a single security, single type of security or security invested in a specific sector that represents a large percentage of his or her overall portfolio. The risks include but are not limited to market risk of not being diversified, as well as business risks that can be affected by changes in consumer preferences, ineffective management, law changes or new competition to name a few. As such, the risks can potentially cause the loss or decline in investment value.

Risk of Loss

Market Risks

Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The profitability of a significant portion of BEAM's recommendations and/or investment decisions may depend to a great extent upon correctly assessing the future course of price movements of stocks, bonds and other asset classes. There can be no assurance that BEAM will be able to predict those price movements accurately or capitalize on any such assumptions.

Mutual Funds and ETFs

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (*e.g.*, sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed based ETFs and potentially more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 20,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

Real Estate Investment Trusts (REITs)

BEAM may recommend an investment in, or allocate assets among, various real estate investment trusts

("REITs"), the shares of which exist in the form of either publicly traded or privately placed securities. REITs are collective investment vehicles with portfolios comprised primarily of real estate and mortgage related holdings. Many REITs hold heavy concentrations of investments tied to commercial and/or residential developments, which inherently subject REIT investors to the risks associated with a downturn in the real estate market. Investments linked to certain regions that experience greater volatility in the local real estate market may give rise to large fluctuations in the value of the vehicle's shares. Mortgage related holdings may give rise to additional concerns pertaining to interest rates, inflation, liquidity and counterparty risk.

Exchange-Traded Notes (ETNs)

BEAM may recommend an investment in, or allocate assets among, various exchange-traded notes ("ETNs"). ETNs are unsecured debt securities which are listed on securities exchanges and transacted at negotiated prices in the secondary market. ETNs are designed to track the performance of a corresponding benchmark. An ETN is essentially a contract between an issuer and the ETN holder, whereby the issuer, upon maturity, agrees to pay an amount relative to the returns of the underlying benchmark. In addition to the risks associated with the specific benchmark, ETN holders are also subject to various counterparty concerns. In this respect, the value of an ETN may be adversely impacted by a downgrade to the issuer's credit rating and/or an unwillingness or inability of the issuer to perform its contractual obligations.

Option Contracts

BEAM may recommend an investment in or allocate assets in option contracts. Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

Item 7. Client Information Provided to Portfolio Managers

In opening an advisory account, BEAM's supervised persons will obtain the necessary financial data from the client, assist the client in determining the suitability of the Program and assist the client in setting appropriate investment objectives.

Item 8. Client Contact with Portfolio Managers

Clients may contact the BEAM supervised person directly to discuss their accounts in detail.

Item 9. Additional Information

Disciplinary Information

BEAM has not been involved in any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of its management.

Other Financial Industry Activities and Affiliations

This item requires investment advisers to disclose certain financial industry activities and affiliations. The Firm does not have any other financial industry activities or affiliations that need to be disclosed.

Registered Representatives of a Broker/Dealer

Most of the Firm's Supervised Persons are registered representatives of SAI and may provide clients with securities brokerage services under a separate commission-based arrangement. This arrangement is described at length in Item 4.

Licensed Insurance Agents

A number of the Firm's Supervised Persons are licensed insurance agents and may offer certain insurance products on a fully-disclosed commissionable basis. A conflict of interest exists to the extent that BEAM recommends the purchase of insurance products where its Supervised Persons may be entitled to insurance commissions or other additional compensation. The Firm has procedures in place whereby it seeks to ensure that all recommendations are made in its clients' best interest regardless of any such affiliations.

Licensed Attorney and/or Certified Public Accountants (CPAs)

A few of the Firm's Supervised Persons are also licensed attorneys or CPA's. These activities are outside of the Firm and investment advisory services. These services are provided pursuant to a separate engagement and for separate fees.

Code of Ethics

BEAM has adopted a code of ethics in compliance with applicable securities laws ("Code of Ethics") that sets forth the standards of conduct expected of its Supervised Persons. BEAM's Code of Ethics contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by the Firm or any of its Supervised Persons and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

The Code of Ethics also requires certain of BEAM's personnel to report their personal securities holdings and transactions and obtain pre-approval of certain investments (*e.g.*, initial public offerings, limited offerings). However, the Firm's Supervised Persons are permitted to buy or sell securities that it also recommends to clients if done in a fair and equitable manner that is consistent with the Firm's policies and procedures. This Code of Ethics has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by certain personnel to be completed without any appreciable impact on the markets of such securities. Therefore, under limited circumstances, exceptions may be made to the policies stated below.

When the Firm is engaging in or considering a transaction in any security on behalf of a client, no Supervised Person will access to this information may knowingly effect for themselves or for their immediate family (i.e., spouse, minor children and adults living in the same household) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the Supervised Person is completed as part of a batch trade with clients; or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

Clients and prospective clients may contact BEAM to request a copy of its Code of Ethics.

Brokerage Practices

Recommendation of Broker/Dealers for Client Transactions

For investment management clients, BEAM generally recommends that clients utilize the custody, brokerage and clearing services of Schwab Advisor Services ("Schwab"), Fidelity Institutional Wealth Services ("Fidelity"), Genworth Financial Wealth Management ("Genworth"), Securities America, Inc. ("SAI"), and TD AMERITRADE Institutional, a division of TD AMERITRADE, Inc. ("TD Ameritrade") for investment management accounts. BEAM participates in the institutional customer program offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA, an unaffiliated SEC-registered broker-dealer and FINRA member. Schwab, TD Ameritrade and Fidelity offer to independent investment advisers services which include custody of securities, trade execution, clearance and settlement of transactions. BEAM receives some benefits from Schwab, TD Ameritrade and Fidelity through its participation in these services. These Financial Institution Custodians provide institutional platform services to the Firm. Institutional platform services include custody of securities, trade execution, clearance and settlement of transactions.

Factors which BEAM considers in recommending Schwab, Fidelity, Genworth, SAI, TD Ameritrade, or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. The Financial Institutions recommended by the Firm may enable the Firm to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by Financial Institutions recommended by the Firm maybe higher or lower than those charged by other Financial Institutions.

The commissions paid by BEAM's clients to Schwab, Fidelity, Genworth, SAI, and/or TD Ameritrade comply with the Firm's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction where BEAM determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution's services, including among others, the value of research provided, execution capability, commission rates and responsiveness. BEAM seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker/dealers in return for investment research products and/or services which assist BEAM in its investment decision-making process. Such research generally will be used to service all of the Firm's clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because BEAM does not have to produce or pay for the products or services.

BEAM periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to obtain best execution.

Software and Support Provided by Financial Institutions

BEAM may receive without cost from the Financial Institution Custodians it recommends, computer software, related systems support and other economic benefits. BEAM may receive these benefits because the Firm renders investment management services to clients that maintain assets at those Financial Institutions.

Specifically, BEAM may receive the following benefits from Financial Institutions:

- Receipt of duplicate client confirmations and bundled duplicate statements;
- Access to a trading desk that exclusively services its institutional traders;
- Access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts;
- Access to an electronic communication network for client order entry and account information; and
- Third-party research, publications, access to educational conferences, roundtables, webinars, and practice management resources.

Additionally, BEAM may receive the following benefits from the Financial Institution Custodians through its registered investment adviser divisions: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its Registered Investment Adviser participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information. The Firm also has the ability deduct advisory fees directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to the Firm by third party vendors. TD Ameritrade, Fidelity and Schwab may fund business consulting and professional services received by BEAM's related persons.

Some of the products and services made available by TD Ameritrade, Fidelity and Schwab through the program may benefit BEAM but not its client. These products or services may assist BEAM in managing and administering client accounts, including accounts not maintained at TD Ameritrade, Fidelity and Schwab. Other services made available by TD Ameritrade, Fidelity and Schwab are intended to help BEAM manage and further develop its business enterprise. The benefits received by BEAM's participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade, Fidelity or Schwab.

The benefits the Firm receives from Financial Institutions it recommends are not provided in connection with clients' securities transactions (i.e., not "soft dollars"). The software, related systems support and other economic benefits may benefit BEAM, but not its clients directly. In fulfilling its duties to its clients, BEAM endeavors at all times to put the interests of its clients first. Clients should be aware; however, that BEAM's receipt of economic benefits from a Financial Institution creates a conflict of interest since these benefits may influence the Firm's choice of one Financial Institution over another that does not furnish similar software, systems support or services.

Brokerage for Client Referrals

BEAM does not consider, in selecting or recommending broker/dealers, whether the Firm receives client referrals from the Financial Institutions or other third party.

Directed Brokerage

The client may direct BEAM in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution and the Firm will not seek better execution services or prices from other Financial Institution or be able to "batch" client transactions for execution through other Financial Institutions with orders for other accounts managed by BEAM (as described above). As a result, the client may pay higher commissions or other transaction costs, greater spreads or may receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, BEAM may decline a client's request to direct brokerage if, in the Firm's sole discretion, such directed brokerage arrangements would result in additional operational difficulties or violate restrictions imposed by other broker-dealers (as further discussed below).

Commissions or Sales Charges for Recommendations of Securities

As discussed above, certain Supervised Persons in their respective individual capacities are registered representatives of SAI. These Supervised Persons are subject to FINRA Rule 3040 which restricts registered representatives from conducting securities transactions away from their broker-dealer unless SAI provides written consent. Therefore, clients are advised that certain Supervised Persons may be restricted to conducting securities transactions through SAI if they have not secured written consent from SAI to execute securities transactions though a different broker-dealer. Absent such written consent or separation from SAI, these Supervised Persons are prohibited from executing securities transactions through any broker-dealer other than SAI under its internal supervisory policies. The Firm is cognizant of its duty to obtain best execution and has implemented policies and procedures reasonably designed in such pursuit.

Trade Aggregation

Transactions for each client generally will be effected independently, unless BEAM decides to purchase or sell the same securities for several clients at approximately the same time. BEAM may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Firm's clients differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among BEAM's clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that the Firm determines to aggregate client orders for the purchase or sale of securities, including securities in which BEAM's Supervised Persons may invest, the Firm generally does so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. BEAM does not receive any additional compensation or remuneration as a result of the aggregation.

In the event that the Firm determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i)) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, the Firm may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

Review of Accounts

BEAM monitors client portfolios on a continuous and ongoing basis while regular account reviews are conducted on at least a quarterly basis. Such reviews are conducted by the Firm's investment adviser representatives. All investment advisory clients are encouraged to discuss their needs, goals and objectives with BEAM and to keep the Firm informed of any changes thereto. The Firm contacts ongoing investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Account Statements and Reports

Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions where their assets are custodied. From time-to-time or as otherwise requested, clients may also receive written or electronic reports from BEAM and/or an outside service provider, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. Clients should compare the account statements they receive from their custodian with any documents or reports they receive from BEAM or an outside service provider.

Client Referrals

In the event a client is introduced to BEAM by either an unaffiliated or an affiliated solicitor, the Firm may pay that solicitor a referral fee in accordance with applicable state securities laws. Unless otherwise disclosed, any such referral fee is paid solely from BEAM's investment management fee and does not result in any additional charge to the client. If the client is introduced to the Firm by an unaffiliated solicitor, the solicitor is required to provide the client with BEAM's written brochure(s) and a copy of a solicitor's disclosure statement containing the terms and conditions of the solicitation arrangement. Any affiliated solicitor of BEAM is required to disclose the nature of his or her relationship to prospective clients at the time of the solicitation and will provide all prospective clients with a copy of the Firm's written brochure(s) at the time of the solicitation.

Other Compensation

Broker/Dealer Affiliation with Securities America

BEAM and its IARs have engaged the services of Securities America, Inc. ("SAI") as its broker/dealer as of July 2015. Upon joining SAI, certain IARs of BEAM were provided with a loan which is forgivable over 5 to 6 years so long as the IAR's relationship with SAI continues and they meet certain production goals with SAI. Production goals may include advisory fees generated by the IAR at the various BEAM custodians and does not have to be custodied at SAI. The amount and term of the loan and production goals may vary with each individual IAR. The loan provided by SAI was intended to assist the IARs with the cost associated with the transition to SAI such as moving expenses, leasing space, furniture, staff, loss of production due to account repapering requirements and termination fees associated with moving accounts; however, BEAM does not confirm the use of these payments for such transition costs.

In addition to the loan, IARs that joined SAI by 2015 may receive future bonus payments, based on certain production goals, from SAI in connection with the transition from another broker/dealer or investment adviser firm. These payments are intended to assist the IAR with cost associated with the transition mentioned above.

IARs that join BEAM and SAI after 2015 may receive similar loan arrangements and/or payments or bonus payments. The amount, term and production goals of any loans or payment may vary.

The loan and any additional payments to new or existing IARs may present a conflict of interest in that an IAR may have a financial incentive to maintain a relationship with SAI and meet production goals.

BEAM advisory accounts are not required to be custodied or traded with SAI.

Custody

The Advisory Agreement and/or the separate agreement with any Financial Institution generally authorize BEAM and/or the Independent Managers to debit client accounts for payment of the Firm's fees and to directly remit that those funds to the Firm in accordance with applicable custody rules. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to BEAM.

In addition, as discussed in Account Statements and Reports section, BEAM may also send periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the Financial Institutions and compare them to those received from BEAM.

Investment Discretion

BEAM may be given the authority to exercise discretion on behalf of clients. BEAM is considered to exercise investment discretion over a client's account if it can effect and/or direct transactions in client accounts without first seeking their consent. BEAM is given this authority through a power-of-attorney included in the agreement between BEAM and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold).

BEAM takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold;
- When transactions are made; and
- The Independent Managers to be hired or fired.

Voting Client Securities

Acceptance of Proxy Voting Authority

BEAM may accept the authority to vote a client's securities (i.e., proxies) on their behalf. When BEAM accepts such responsibility, it will only cast proxy votes in a manner consistent with the best interest of its clients. Absent special circumstances, which are fully-described in the Firm's Proxy Voting Policies and Procedures, all proxies will be voted consistent with guidelines established and described in BEAM's Proxy Voting Policies and Procedures, as they may be amended from time-to-time. Clients may contact BEAM to request information about how the Firm voted proxies for that client's securities or to get a copy of BEAM's Proxy Voting Policies and Procedures. A brief summary of BEAM's Proxy Voting Policies and Procedures is as follows:

- BEAM has formed a Proxy Voting Committee that will be responsible for monitoring corporate actions, making voting decisions in the best interest of clients, and ensuring that proxies are submitted in a timely manner.

- The Proxy Voting Committee will generally vote proxies according to BEAM's then current Proxy Voting Guidelines. The Proxy Voting Guidelines include many specific examples of voting decisions for the types of proposals that are most frequently presented.

- Although the Proxy Voting Guidelines are followed as a general policy, certain issues are considered on a case-by-case basis based on the relevant facts and circumstances.

- Clients cannot direct BEAM's vote on a particular solicitation but can revoke the Firm's authority to vote proxies.

In situations where there may be a conflict of interest in the voting of proxies due to business or personal relationships that BEAM maintains with persons having an interest in the outcome of certain votes, the Firm takes appropriate steps to ensure that its proxy voting decisions are made in the best interest of its clients and are not the product of such conflict.

Financial Information

BEAM is not required to disclose any financial information due to the following:

- The Firm does not require or solicit the prepayment of more than $1,200 in fees six months or more in advance of services rendered;
- The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.

PRIVACY POLICY

Commitment to Privacy

Clients of BEAM share both personal and financial information. Privacy is important to us, and we are dedicated to safeguarding your information.

Information Provided by Clients
In the normal course of business, BEAM typically obtains the following information about clients:

- Personal identity information such as name, address, and social security number;
- Information regarding securities transactions; and
- Financial information such as net-worth, assets, income, bank account information, and account balances.

How BEAM Manages and Preserves Personal Information

BEAM does not sell information about current or former clients to 3rd parties. It is not a practice of BEAM to disclose such information to 3rd parties unless requested to do so by a client, client representative, or if necessary, in order to process a transaction, service an account, or manner permitted by law. In addition, BEAM may share information with outside companies contracted to perform administrative services. BEAM's contractual arrangements with service providers require them to treat your information as confidential.

In order to preserve your personal information, BEAM maintains physical, electronic and procedural safeguards. Our Privacy Policy restricts the use of client information and requires that it be held in strict confidence.

Client Notifications
We are required by law to annually provide a notice describing our privacy policy. In addition, we will inform you promptly if there are changes to our policy. Please do not hesitate to contact us with questions about this notice.