Item 1. Cover Page

Form ADV, Part 2A

Disclosure Brochure
of
Beaird Harris Wealth Management, Inc.

12221 Merit Drive, Suite 750
Dallas, TX 75251
(972) 503-1040
http://www.bh-wm.com

Dated: March 30, 2018

This brochure provides information about the qualifications and business practices of Beaird Harris Wealth Management, Inc. If you have any questions about the contents of this brochure, please contact us at (972) 503-1040 or JacobK@bh-co.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Registration with the SEC or any state securities authority does not imply a certain level of skill or training. Additional information about Beaird Harris Wealth Management, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2. Material Changes Summary

This brochure provides prospective clients with information about Beaird Harris Wealth Management, Inc. that should be considered before or at the time of obtaining our advisory services.

Effective March 31, 2011, the SEC adopted a new form of brochure for registered investment advisers that includes the information previously required in Form ADV Part II. This brochure is required to be updated at least annually or sooner when material changes to our business take place.

There have been no material changes to our business during the previous calendar year.

Each year we will deliver to you, by no later than April 30th, a free updated brochure that includes or is accompanied by a summary of material changes; or a summary of material changes and an offer to provide a copy of the updated brochure and how to obtain it.

Item 3. <u>Table of Contents</u>

Item 4. Advisory Business

Firm Description

Beaird Harris Wealth Management, Inc. ("Adviser") has been operating as an investment advisory firm since 1996. The Adviser primarily conducts its business under the name Beaird Harris.

Principal Owner

Adviser's principal owner and President is Patrick C. Beaird.

Types of Advisory Services

Adviser is a fee-only financial planning firm that provides a variety of investment advisory and financial planning services to clients. Adviser provides investment advisory services, furnishes investment advice through consultations and furnishes advice to clients on matters not involving securities.

The Adviser offers advice on the following types of investments: equity securities, corporate debt securities, commercial paper, certificates of deposit, municipal securities, and other investment company securities including variable life insurance, variable annuities, mutual fund shares, U.S. government securities and partnership investing.

Adviser provides general advice on all types of investments that are in the client's portfolio when the client begins an advisory relationship with Adviser. It is not anticipated that Adviser will recommend new investments in any type of security that is not listed above.

From time to time, clients may hold securities for which Adviser does not recommend buy or sell transactions; however, due to either capital gains considerations, or the client's instructions, the client may choose to hold the security and may wish to have it considered in the client's overall portfolio allocation. In such cases, Adviser will attempt to identify which category the security is most appropriately allocated to and will then consider it as part of that category when analyzing the client's overall portfolio allocation and rebalancing needs.

Investment Advisory Services

Adviser provides investment advisory services, defined as giving continuous advice to a client or making investments for a client based on the individual needs of the client. Adviser will design an investment strategy for each client based on asset allocation and using modern portfolio theory and will make investments for the client based on that strategy. ***See additional information under Item 8.***

Adviser provides this service to individuals, high net worth individuals, pension, 401(K) and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities. Adviser manages advisory accounts on a discretionary basis. Account supervision is guided by the stated objectives of the client (i.e., ultra aggressive, aggressive growth, moderate growth, conservative growth, defensive, fixed income).

Financial Planning Services

For financial planning clients and for additional compensation, Adviser also provides advice in the form of a financial plan. The type of planning and level of detail varies depending on the client's objectives. In general, the financial plan may address any or all of the following areas of concern:

- **Personal** – Family records, budgeting and debt management, personal liability, estate planning and financial goals.
- **Tax and Cash Flow** – Income tax and spending analysis and planning for past, current and future years. The impact of various investments on the client's current income tax and future tax liability may be illustrated.
- **Death and Disability** – Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.
- **College Planning** – Review of escalating college costs and analysis of alternative strategies to best help the client accomplish his plans for college funding.
- **Retirement** – Analysis of current strategies and investment plans to help the client achieve his retirement goals.
- **Investments** – Analysis of investment alternatives and their effect on a client's portfolio.

Adviser gathers required information through in-depth personal or telephone interviews. Information gathered includes client's current financial status, future goals and attitudes towards risk. Adviser is not required to verify any information received from the client or the client's other professionals. It is the responsibility of the client to promptly notify the Adviser if there is ever any change in their financial situation or investment objectives. Adviser will rely on this information when preparing a written report for the client. Implementation of the plan recommendations is entirely at the client's discretion.

Assets Under Management

As of December 31, 2017, the Adviser's total assets under management are as follows:

Discretionary Clients = $971,215,744

Non-Discretionary Clients = $56,847,727

Total = $1,028,063,471

Miscellaneous

ERISA / IRC Fiduciary Acknowledgement: If the client is: (i) a retirement plan ("Plan") organized under the Employee Retirement Income Security Act of 1974 ("ERISA"); (ii) a participant or beneficiary of a Plan subject to Title I of ERISA or described in section 4975(e)(1)(A) of the Internal Revenue Code, with authority to direct the investment of assets in his or her Plan account or to take a distribution; (iii) the beneficial owner of an Individual Retirement Account ("IRA") acting on behalf of the IRA; or (iv) a Retail Fiduciary with respect to a plan subject to Title I of ERISA or described in section 4975(e)(1)(A) of the Internal Revenue Code: then the firm represents that it and its representatives are fiduciaries under ERISA or the Internal Revenue Code, or both, with respect to any investment advice provided by the firm or its representatives or with respect to any investment recommendations regarding an ERISA Plan or participant or beneficiary account.

Retirement Rollovers - No Obligation/Conflict of Interest: A client or prospect leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in his former employer's plan, if permitted, (ii) roll over the assets to his/her new employer's plan, if one is available and rollovers are permitted, (iii) rollover to an IRA, or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). Adviser may recommend an investor roll over plan assets to an Individual Retirement Account (IRA) advised by Adviser. As a result Adviser and its representatives may earn an asset-based fee. In contrast, a recommendation that a client or prospective client leave his or her plan assets with his or her old employer or roll over the assets to a plan sponsored by a new employer will generally result in no compensation to Adviser (unless you engage Adviser to monitor and/or advise on the account while maintained with the client's employer). Adviser has an economic incentive to encourage an investor to roll plan assets into an IRA that Adviser will advise on or to engage Adviser to monitor and/or advise on the account while maintained with the client's employer. There are various factors that Adviser may consider before recommending a rollover, including but not limited to: (i) the investment options available in the plan versus the investment options available in an IRA, (ii) fees and expenses in the plan versus the fees and expenses in an IRA, (iii) the services and responsiveness of the plan's investment professionals versus those of Adviser, (iv) protection of assets from creditors and legal judgments, (v) required minimum distributions and age considerations, and (vi) employer stock tax consequences, if any. No client is under any obligation to roll over plan assets to an IRA advised by Adviser or to engage Adviser to monitor and/or advise on the account while maintained with the client's employer.

Use of Mutual Funds: Most mutual funds are available directly to the public. Thus, a prospective client can obtain many of the mutual funds that may be recommended and/or utilized by Adviser independent of engaging Adviser as an investment advisor. However, if a prospective client determines to do so, he/she will not receive Advisers' initial and ongoing investment advisory services.

Use of DFA Mutual Funds: The mutual funds sponsored by Dimensional Fund Advisors ("DFA") are generally only available through registered investment advisers. Adviser utilizes DFA mutual funds. Thus, if the client was to terminate Adviser' services, restrictions regarding transferability and/or additional purchases of, or reallocation among, DFA funds will apply.

Participant Directed Retirement Plans: Adviser may also provide investment advisory and consulting services to participant directed retirement plans per the terms and conditions of a Retirement Plan Consulting Agreement between Adviser and the plan. For such engagements, Adviser shall assist the Plan sponsor with the selection of an investment platform from which Plan participants shall make their respective investment choices, and, to the extent engaged to do so, may also provide corresponding education to assist the participants with their decision making process.

Chief Compliance Officer, Jacob King, remains available to address any questions that a client or prospective client may have regarding the above.

Item 5. Fees and Compensation

The Adviser's standard fee schedule is as follows:

Advisory Fees

Assets Under Management	Annual Fee
Amount between $0 - $1,000,000	1.00%
Amount between $1,000,000 - $2,000,000	0.75%
Amount between $2,000,000 - $10,000,000	0.50%
Amounts in excess of $10,000,000	Negotiable

A minimum annual fee of $5,000 per year is required for this service. Fees for financial planning and other services may be charged in addition to fees for investment advisory services.

Financial Planning Fees

Fees for financial planning are between $150.00 to $350.00 per hour, depending on the complexity of the plan and the experience level of the planner involved and are billed in arrears as they are earned. A typical financial plan may take from 20 to 60 hours to prepare; an estimate of the time required will be given to the client at the outset of the financial planning process. This fee may be quoted at a flat rate. Financial planning fees may be reduced for persons who elect to become Investment Advisory Service clients. However, no financial planning client is obligated to use us (the Adviser) for this service.

Fees Generally

At Adviser's discretion, fees may be waived, in whole or in part, for clients who are members of the families of Adviser's associated persons. In certain circumstances, fees and account minimums may be negotiable. Fees charged may vary from client to client.

Fee Billing

Advisory clients will be invoiced in advance at the beginning of each calendar quarter. The advisory fee will generally be calculated by using the client's portfolio balance on the last trading day of the previous quarter. Clients with multiple accounts have the option to have all account balances aggregated for the purpose of applying the scale stated above. The annual amount calculated will be divided by four to arrive at the amount to be billed for the upcoming quarter. The initial quarterly bill will contain, in addition to the regular fee, a prorated amount for the prior quarter, which is the initial quarter for the account. At the agreement of both the client and Adviser, fees may be recalculated per diem if deposits to, or withdrawals from, any one account exceeds $50,000.00 on any given day and causes a fee adjustment in excess of $50.00.

Other Fees and Expenses

The Adviser's fees do not include custodial fees or brokerage commissions or other transaction costs, if any, charged by client's custodian and broker. Adviser does not receive any compensation from charges assessed by the custodian. Mutual funds in which client's assets may be invested charge additional advisory fees and other fees and expenses, as described in the applicable fund's prospectus. ***See additional information under Item 12.***

Termination of Advisory Agreement

A client agreement may be canceled at any time, by either party, for any reason upon receipt of written notice, except that a client may cancel within five business days of entering a written agreement with Adviser without payment of any fees or penalties. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Item 6. Performance Based Fees and Side by Side Management

Adviser does not charge any performance based fees.

Item 7. Types of Clients and Minimum Requirements

The Adviser generally provides investment advice to individuals, high net worth individuals, pension, 401(K) and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities. The Adviser has certain minimum thresholds that have been established to allow the Adviser to provide the high level of personal service and attention which we believe our clients deserve. Adviser prefers a minimum account size of $500,000 and typically requires a minimum annual fee of $5,000 for investment advisory services.

Adviser, in its sole discretion, may charge a lesser investment management fee and/or reduce or waive its aggregate account minimum and/or minimum annual fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.). If you maintain less than $500,000 of assets under Adviser's management, and are subject to the $5,000 annual minimum fee, you will pay a higher percentage annual fee than the 1.00% referenced in the above fee schedule. **Please Further Note**: Adviser, in its sole discretion, may reduce its annual minimum fee to $3,500 for those individuals whom it perceives have enhanced future earnings/investing ability, including young professionals.

Item 8. Method of Analysis, Investment Strategies and Risk of Loss

Adviser employs a wide range of methods to manage portfolios and evaluate investments. Adviser primarily utilizes an investment approach based on Modern Portfolio Theory. Adviser bases its recommendations on asset allocation methods consistent with Modern Portfolio Theory. This method combines specific asset classes, which may behave differently from each other, into one portfolio for the purpose of reducing the overall portfolio's volatility. Adviser uses domestic and international equity asset classes and domestic and global fixed income asset classes. Adviser primarily uses no-load institutional mutual funds and/or exchange-traded funds (ETFs) to implement its recommendations. Adviser does not provide advice for buying or selling any individual equity security, other than open-ended mutual funds, except when the client requests our opinion.

Adviser analyzes mutual funds recommended to clients based on a fund's total operating expense ratio, portfolio turnover, investment objective and investment restrictions and limitations. Adviser typically recommends that clients invest in no-load funds advised by Dimensional Fund Advisors (DFA) or Vanguard that have low operating expenses, low portfolio turnover, below average capital gains distributions and a fundamental investment objective of investing primarily within a particular asset class. DFA funds generally are available for investment only by clients of Registered Investment Advisors who have been authorized by DFA to utilize their funds for the benefit of Adviser's clients. This means that you may not be able to make additional investments in DFA funds if you terminate your agreement with Adviser, except through another adviser authorized by DFA.

Adviser will also periodically recommend transactions that may be necessary to rebalance client portfolios to more accurately reflect the target allocation that was originally agreed upon by the client and Adviser. When making investment decisions Adviser uses academic research, financial newspapers and magazines, annual reports, prospectuses, filings with the SEC and information obtained from historical performance database software (including that provided by Morningstar, Ibbotson, and Dimensional Fund Advisors). Before recommending such transactions, Adviser will consider the economic effect of tax considerations and transaction costs and will only recommend rebalancing when Adviser believes the benefits outweigh the impact of transaction costs and taxes.

We believe in diversified asset class exposure obtained primarily through a diversified mix of low cost mutual funds that represent desired asset classes. Mutual funds and exchange-traded funds (ETFs) recommended by Adviser typically invest in some or all of the following types of securities:

- U.S. Stocks of any market capitalization
- Foreign Stocks, including Emerging Markets
- Investment Grade Fixed Income Securities
- Non-Investment Grade Fixed Income Securities
- U.S. Government and Government Agency Securities
- Derivatives
- Reinsurance Securities
- Real Estate Investment Trusts (Domestic and Foreign)

Principal Investment Strategies

Asset allocation models and specific funds recommended to clients typically are set forth in the client *Investment Objective Confirmation* letter. Adviser primarily recommends low cost mutual funds for the reason that mutual funds can provide a diversified portfolio that is designed to limit the impact of large fluctuations in values of individual stocks and bonds. Mutual funds do not offer protection from market volatility. At times, different funds may be recommended to improve current client portfolios. Upon the request of a client, Adviser may provide a limited review of client assets for which we do not have discretionary authority in the context of the overall plan. Adviser invests for the long-term and does not engage in market timing.

Adviser generally does not recommend individual stocks or bonds, but certain exceptions may be made in cases where the stocks were obtained before becoming a client or are requested by the client. We monitor individual stock exposure in the overall portfolio.

We may give advice and take action with respect to other clients that is different from the advice, timing, and nature of action taken with respect to your account. Timing, allocation, and types of investments are determined in light of each client's personal situation.

The Adviser typically uses long-term investment strategies to implement investment advice given to clients. In certain circumstances Adviser will utilize a dollar cost averaging strategy. A long-term purchase strategy generally assumes the financial markets will go up in the long-term, which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing long-term investments may involve an opportunity cost – that of "locking-up" assets that may be better utilized in the short-term for other investments.

Principal Investment Risks

Investing in securities involves risk of loss that clients should be prepared to bear. Risk refers to the possibility that you will lose money (both principal and any earnings) or fail to make money on an investment. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment, including those recommended by the Adviser, will be profitable. The Adviser cannot guarantee that it will achieve a client's investment objective. Below are some of the more specific risks of investments which the Adviser may recommend to clients:

- **Market Risk**. The prices of securities held by mutual funds in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by the Fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- **Management Risk**. The Adviser's investment approach may fail to produce the intended results. If the advisor's perception of the performance of a specific asset class or fund is not realized in the expected time frame, the overall performance of client's portfolio may suffer.
- **Equity Risk**. Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- **Fixed Income Risk.** The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by the Fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- **Liquidity Risk.** The Adviser may utilize mutual funds and/or ETFs that provide for limited liquidity, generally on a quarterly basis. If it is determined that the fund was no longer performing or if the client ever determined to transfer their account away from the Adviser's management, the Fund may not be sold or transferred immediately. Rather, sale or transfer would need to await the quarterly permitted sale date. Moreover, the eventual net asset value for the Fund could be substantially different (positive or negative) than the Fund value on the date that the sale was requested.
- **Investment Companies Risk.** When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly to those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment

strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.

- **Real Estate Investment Trust Risk**. To the extent that a client invests in REITs, it is subject to risks generally associated with investing in real estate, such as (i) possible declines in the value of real estate, (ii) adverse general and local economic conditions, (iii) possible lack of availability of mortgage funds, (iv) changes in interest rates, and (v) environmental problems. In addition, REITs are subject to certain other risks related specifically to their structure and focus such as: dependency upon management skills; limited diversification; the risks of locating and managing financing for projects; heavy cash flow dependency; possible default by borrowers; the costs and potential losses of self-liquidation of one or more holdings; the possibility of failing to maintain exemptions from securities registration; and, in many cases, relatively small market capitalization, which may result in less market liquidity and greater price volatility.
- **Derivatives Risk**. Mutual funds in a client's portfolio may use derivative instruments. The value of these derivative instruments derives from the value of an underlying asset, currency or index. Investments in such mutual funds may involve the risk that the value of the fund's derivatives may rise or fall more rapidly than other investments, and the risk that the mutual fund may lose more than the amount that it invested in the derivative instrument in the first place. Derivative instruments also involve the risk that other parties to the derivative contract may fail to meet their obligations, which could cause losses.
- **Inverse/Enhanced Market Risk.** The Adviser may utilize long and short mutual funds and/or ETFs that are designed to perform in either an: (1) inverse relationship to certain market indices as an investment strategy and/or for the purpose of hedging against downside market risk; and (2) enhanced relationship to certain market indices as an investment strategy and/or for the purpose of increasing gains in an advancing market. There can be no assurance that any such strategy will prove profitable or successful.
- **Foreign Securities Risk**. Mutual funds in a client's portfolio may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less stringent accounting standards, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.

Item 9. Disciplinary Information

The Adviser has no material legal or disciplinary events to report.

Item 10. <u>Other Financial Industry Activities and Affiliations</u>

Adviser only provides investment advice and financial planning services.

The principal executive officer, Patrick C. Beaird, and other employees of Adviser are also employees of Beaird Harris & Co., an accounting firm. All overhead and salary expenses are shared with Beaird Harris & Co. Adviser reimburses Beaird Harris & Co. for all direct expenses incurred on behalf of Adviser as well as an agreed amount for indirect expenses, such as salaries, rent, supplies, and other costs. Advisory clients in need of accounting services may be referred to Beaird Harris & Co. **<u>This represents a potential conflict of interest. No client is obligated to use this firm for accounting services</u>**. Accounting services are provided for separate and typical compensation. Beaird Harris & Co. does not compensate Adviser for client referrals.

While not a part of this person's principal business, a representative of Adviser is also an officer and director of IPC National Charitable Foundation, a public charity, which oversees the operations of several entities formed for charitable purposes. Adviser's representative may recommend the services of IPC National Charitable Foundation to Adviser's clients seeking to implement charitable planning strategies. The Adviser's principal may also recommend Beaird Harris & Co., P.C., Adviser's affiliated CPA firm to provide accounting services to IPC and/or the underlying charitable entities which it oversees. **<u>This represents a potential conflict of interest. No client is under any obligation to accept a recommendation to use IPC's services.</u>**

Adviser is a member, along with several other registered investment advisers, of Zero Alpha Group, L.L.C. ("ZAG"). Patrick C. Beaird, serves as Treasurer of ZAG. ZAG members are geographically diverse, and their executives meet regularly to share investment information, strategic and marketing plans and research related to Modern Portfolio Theory and passive investment management techniques. ZAG also may negotiate with mutual fund companies and broker-dealers in an effort to obtain lower cost investment services on behalf of the members' respective clients. The members of ZAG are committed to structured, tax-managed investment strategies.

Patrick C. Beaird, in his individual capacity, is a shareholder (less than 1%) and Board member of Savant Capital Management ("Savant"), an SEC registered investment adviser and a member firm of ZAG. Other than his personal association with Savant, the Adviser does not, in any manner whatsoever, have any business relationship with Savant relative to the Adviser's investment advisory operations.

Patrick C. Beaird also maintains a position on the Board of Directors for the Association of Former Students with his alma mater, Texas A&M University. This appointment has allowed him to also serve on the investment committee of the Texas A&M Foundation which oversees an endowment fund. The University requires all directors to adhere to very strict no conflict of interest policies and nondisclosure agreements. Adviser's principal's involvement with the Board is voluntary and is not a part of his primary business.

Item 11. Code of Ethics, Interest in Client Transactions and Personal Trading

Code of Ethics

Adviser strives to maintain a responsible and ethical way of conducting business. All employees are bound to abide by the ethics standards set forth in our policy and handbook, adopted pursuant to the Investment Advisers Act of 1940. Employees are responsible for reporting their personal securities transactions regularly and reviewing the Code of Ethics at least annually. A copy of the Code of Ethics is available to all clients upon request.

Employees of Adviser who have obtained the Certified Financial Planner (CFP®) designation are bound by the CFP Board's *Standards of Professional Conduct*, which outline ethical and practice standards for CFP® professionals. Employees of Adviser who are a licensed Certified Public Accountant (CPA) are bound by the American Institute of Certified Public Accountants' *Code of Professional Conduct.* On behalf of Adviser, only our employees with a CFP® or CPA designation and bachelor's degree in relative fields are authorized to give advice to clients.

Participation or Interest in Client Transactions

Adviser generally does not recommend investments to clients in which Adviser or any of its principals have a financial interest. Prior to proposing any such investment to a client, the Adviser or its related person would be required to disclose any participation or interest in the transaction to the client and to obtain the approval of Adviser's Chief Compliance Officer in advance. No person associated with the Adviser may prefer their own interest to that of an advisory client.

Personal Trading

Adviser employees are subject to the firm's Code of Ethics and must report their personal securities transactions to our Chief Compliance Officer for review on a regular basis to the extent required under the Investment Advisers Act of 1940. Adviser's investment adviser representatives may buy or sell shares of mutual funds that they also recommend to clients. It is Adviser's policy that no person employed by Adviser may purchase or sell any security prior to a transaction being implemented for an advisory account, thereby preventing employees from benefiting from transactions placed on behalf of advisory accounts. Adviser has adopted an Insider Trading Policy that prohibits its investment advisory representatives from trading on material non-public information.

Item 12. Brokerage Practices

Recommendations of Brokers

At the client's request, Adviser may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), a registered broker-dealer, Member FINRA/SIPC® or Fidelity Investments ("Fidelity") to maintain custody of clients' assets and to effect trades for their accounts. Although Adviser may recommend a particular broker, Adviser does not have discretion to select brokers without the client's consent and approval. When Adviser recommends a brokerage firm, Adviser considers the following factors: financial strength, reputation, execution capability and reliability of the software the broker-dealer provides to Adviser, quality and clarity of the broker-dealer's statements to clients, financial responsibility of the broker-dealer, the broker-dealer's responsiveness to Adviser and commission and transaction fees paid by the client.

Best Execution

Although the commission and transaction fees paid by the client shall comply with the Adviser's duty to obtain best execution, a client may pay a commission higher than another broker-dealer might charge to effect the same transaction. Best execution does not mandate the lowest possible cost, but whether the transaction represents the best qualitative execution taking into consideration the full range of broker-dealer services including products, research, technology and responsiveness. Accordingly, the Adviser will seek competitive rates, while it may not represent the lowest possible rate. Adviser has evaluated the full range of brokerage services offered by Schwab and Fidelity and considers them to have reliable execution capabilities, compared to other comparable brokers.

If a client wishes to direct Adviser to use a particular broker-dealer, other than Schwab or Fidelity, to execute trades for the client's account, the client should be aware that best execution may not be achieved, and the client may pay more in commissions than Adviser's other clients pay. Adviser may decline to direct trades to a particular broker-dealer if Adviser believes the use of such broker-dealer would impair Adviser's ability to advise its clients.

The broker-dealer, not Adviser, determines the commission rate and fees charged to clients. The broker-dealers generally do not charge separately for custody but are compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through them or that settle into their accounts. These commissions and transaction fees are in addition to the Adviser's investment advisory fees.

Soft Dollar

Adviser does not enter into so-called "soft dollar arrangements," which occurs when the custodian provides the Adviser monetary credit from transaction fees earned by the custodian, which are then used to purchase certain investment-related products on behalf of the Adviser.

While as a fiduciary, Adviser endeavors to act in its clients' best interests, Adviser's recommendation that clients maintain their assets in accounts at a particular broker-dealer may be based in part on the benefit to Adviser of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the broker-dealer, which may create a potential conflict of interest.

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker, Adviser may receive from Fidelity or Schwab without cost, or at a discount, support services and/or products, certain of which assist the Adviser to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by the Adviser may be receipt of duplicate confirmation statements, access to trading desk, direct deduction of Adviser's fees, pricing information, market data, software and other technology that provide access to client account data, compliance and practice management-related publications, consulting services, discounted attendance at conferences and meetings and other products used by Adviser in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and products that *may* be received may assist the Adviser in managing and administering client accounts. Others do not directly provide such assistance, but rather assist the Adviser to manage and further develop its business enterprise.

There is no corresponding commitment made by the Adviser to Fidelity or Schwab or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

Directed Brokerage
Adviser recommends that its clients utilize the brokerage and custodial services provided by ether Schwab or Fidelity. Adviser does not accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer).

Order Aggregation
The vast majority of transactions effected by Adviser for client accounts are open-end mutual funds. Transactions for each client account generally will be effected independently. To the extent applicable relative to exchange listed equity purchases (ETFs), Adviser may determine to purchase or sell the same securities for several clients at approximately the same time. In such situations, Adviser may (but is not obligated to) combine or "bunch" such orders when it believes that it might result in obtaining better price execution.

Item 13. Review of Accounts

Reviews

Investment Advisory Services: The securities in every client's account will be under continuous review. Client accounts will typically be reviewed at least quarterly. Accounts will be reviewed by Adviser's Portfolio Managers or Financial Advisors. Review may be triggered by material market, economic or political events, or by changes in the client's financial situation.

Financial Planning: Clients may arrange for a review of their plans. Plans will be reviewed by the President, Vice President, Portfolio Manager and/or Certified Financial Planner™ Professional.

Reports

Investment Advisory Services: Clients will receive quarterly statements from a third party custodian. In addition, the Adviser will create performance reports which can be accessed through the Adviser's secure Client Portal.

Item 14. Client Referrals and Other Compensation

Referrals of Other Professionals
The principal executive officers and other employees of Adviser are also employees of Beaird Harris & Co., an accounting firm. Advisory clients in need of accounting services may be referred to Beaird Harris & Co. **No client is obligated to use this firm for accounting services**. Accounting services are provided for separate and typical compensation. Beaird Harris & Co. does not compensate Adviser for client referrals.

Adviser may provide advice regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. The Adviser does not serve as an attorney, accountant, or insurance agent, and no portion of Adviser's services should be construed as such. To the extent requested by a client, Adviser may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance, etc.), including our affiliated CPA firm, Beaird Harris & Co., P.C. **The client is under no obligation to engage the services of any such recommended professional**. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Adviser. **Please Note**: If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional and hold the Adviser harmless.

Other Compensation
Adviser is a fee-only financial planning and independent advisory firm. Adviser does not receive commissions, service fees, 12b-1 fees or other compensation as a result of our recommendations or advice to a client.

Item 15. Custody

Adviser does not maintain physical custody of client funds or securities. Clients will receive quarterly account statements from their custodian and should review their account statements carefully. Performance reports are sent to all clients by Adviser periodically. Clients are urged to compare Adviser performance reports with custodial statements and to promptly report any issues. **Please Note:** The account custodian does not verify the accuracy of the Adviser's advisory fee calculation. The Adviser does engage in other services on behalf of its clients that require disclosure at the Custody section of Part 1 of Form ADV. These services are subject to an annual surprise CPA examination in accordance with the requirements of Rule 206(4)-2 under the Investment Advisers Act of 1940.

Item 16. Investment Discretion

Discretionary Authority for Trading
Adviser's clients enter into investment advisory agreements with Adviser under which clients typically grant Adviser discretionary authority over the client's account to determine the securities to be bought and sold, to place trades, to negotiate transactions costs on their behalf, where possible, and periodically to rebalance the client's account back to the recommended allocation. Adviser has no obligation to supervise or direct investments held in client accounts that were not recommended, or that are not subject to review, by Adviser for a fee. In some circumstances, Adviser may agree to arrangements with clients under which this authority is narrowed.

Limited Power of Attorney
Clients are required to grant a "Limited Power of Attorney" to Adviser over client's custodial account for purposes of trading and fee deduction. The client grants this authority in the brokerage account application.

Item 17. Voting Client Securities

Adviser does not exercise proxy voting authority over securities held in clients' accounts. Each client retains proxy voting authority over the securities that are held in the client's account. Adviser promptly will forward to the client all proxy solicitation notices it receives that relate to securities held in the client's account. Client may thereafter, in the client's sole discretion and at the client's sole expense, decide how to vote such proxies. Copies of our proxy voting policy are available, free of charge, upon the client's written request to Adviser. Clients may contact Adviser with any questions about a mutual fund proxy solicitation at the address on the cover page.

Item 18. Financial Information

Adviser does not solicit fees of more than $1,200, per client, six months or more in advance.

We are not aware of any financial conditions that are reasonably likely to impair our fulfillment of our contractual commitments to our clients.

Adviser has not been the subject of a bankruptcy petition.

Item 19. Requirements for State Registered Advisers

Because Adviser is a federally registered investment adviser, this Item is not applicable.

The Adviser's Chief Compliance Officer, Jacob B. King, CFP®, remains available to address any questions regarding this ADV Part 2A.