



**BeeSure Wealth Management, Inc.
d/b/a
Assurity Wealth Management**

Form ADV Part 2A – Disclosure Brochure

Effective: April 30, 2025

This Disclosure Brochure provides information about the qualifications and business practices of Assurity Wealth Management ("AWM"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (941) 739-5006.

AWM is a Registered Investment Advisor with the State of Florida. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about AWM to assist you in determining whether to retain the Advisor.

Additional information about AWM and its advisory persons are available on the SEC's website at www.adviserinfo.sec.gov.

Assurity Wealth Management
CRD No: 143451
2429 Manatee Avenue East, Unit 1
Bradenton, FL 34208
Phone: (941) 739-5006 * Fax: (941) 866-0998
www.assuritywealth.com

Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A and Part 2B*. *Part 2A* (the "Disclosure Brochure") provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. *Part 2B* (the "Brochure Supplement") provides information about advisory personnel of AWM.

AWM believes that communication and transparency are the foundation of our relationship and continually strive to provide our Clients with the complete and accurate information at all times. We encourage all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

The material changes in this brochure from the last annual updating amendment of AWM on March 28, 2025 are described below. This list summarizes changes to policies, practices or conflicts of interests only.

- AWM no longer uses the custodial services of Interactive Brokers. Instead, the custodian that handles the client assets for our third party asset manager, White Rock Capital Management, is LPL Financial.
- The client assets that are managed by White Rock Capital Management are under a Solicitor's Agreement with Hansen & Associates Financial Group, Inc.
- The advisory fees for assets managed by White Rock Capital Management will no longer be on a tiered basis, but rather a flat 1.85% with Hansen & Associates receiving 0.60% of that 1.85% advisory fee based on the Solicitor's Agreement the firm has with White Rock Capital Management.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of AWM.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

To review the firm information for AWM:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter **143451** (our firm's CRD number) in the field labeled "Firm IARD/CRD Number".
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (941) 739-5006.

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Item 4 – Advisory Services

A. Firm Information

Beesure Wealth Management, Inc. d/b/a Assurity Wealth Management ("AWM" or the "Advisor") is a Registered Investment Advisor with the State of Florida, which is organized as an S Corporation under the laws of the State of Florida. AWM was founded in 2007 and is owned and operated by David Scott Appleby, President. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by AWM.

B. Advisory Services Offered

AWM offers investment advisory services to individuals, high net worth individuals, as well as their legacy trusts and estates (each referred to as a "Client").

Account Portfolio Management

AWM provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. AWM works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio allocation. AWM will then construct a portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds ("ETFs") to achieve the Client's investment goals. The Advisor may also utilize individual stocks, MLP Mutual Funds, and bonds to meet the needs of its Clients.

AWM's investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. AWM will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

AWM evaluates and selects ETFs and mutual funds for inclusion in Client portfolios only after applying their internal due diligence process. AWM may recommend, on occasion, redistributing investment allocations to diversify the portfolio. AWM may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. AWM may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

Prior to rendering investment advisory services, AWM will ascertain, in conjunction with the Client, the Client's financial situation, risk tolerance, and investment objective[s].

Managed Account Programs

AWM may recommend to Clients that all or a portion of their portfolio be implemented by utilizing one or more unaffiliated money managers participating in a managed accounts program at the Client's selected custodian (the "Program Sponsor"). If the Client elects to the services of a third-party money manager, the Client will then enter into a program and investment advisory agreement with the Program Sponsor and the participating money manager[s]. The Advisor will assist and advise the Client in establishing investment objectives for the account, the

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selection of the money manager[s], and defining any restrictions on the account. AWM will continue to provide oversight of the Client account and ongoing monitoring of the activities of the unaffiliated money managers.

These money managers will develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such services, the Program Sponsor will charge a program fee that includes the investment advisory fee of the money managers, the administration of the program and trading, clearance and settlement costs. The Program Sponsor will add AWM's Investment Advisory Fee (described below in Item 5) and will deduct the overall fee from the Client account, generally at the start of each calendar quarter. The asset-based program fee is tiered and varies depending on the size of the account, the asset class of the underlying securities and the sub-advisor selected. The overall fee (including the Advisor's Investment Advisor Fee) will not exceed 3% annually.

The Client, prior to entering into an agreement with a Program Sponsor, will be provided with the Program Sponsor's Form ADV Part 2 (or a brochure that makes the appropriate disclosures). In addition, AWM and its Client will agree in writing that that selected Program Sponsor will manage the Client's account on a discretionary basis.

All accounts receiving Account Portfolio Management or Managed Account Program services as described above, will be maintained with an independent qualified custodian. See Item 12 Brokerage Practices for additional information.

Financial Planning and Consulting Services

AWM will typically provide a variety of financial planning services to individuals and families, pursuant to a written Financial Planning or Consulting Agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation for clients based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client's financial situation.

A financial plan developed for, or financial consultation rendered to, the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. AWM may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to affect the transaction through the Advisor.

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C. Client Account Management

Prior to engaging AWM to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – AWM, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives. An Investment Policy Statement generally includes specific information on the Client's stated goals, time horizon for achieving the goals, investment strategies, Client risk tolerance and any restrictions imposed by the Client.
- Asset Allocation – AWM will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – AWM will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – AWM will provide investment management and ongoing oversight of the Client's portfolio and overall account.

D. Wrap Fee Programs

AWM does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by AWM, or via a third party asset manager.

E. Assets Under Management

As of February 8, 2025, AWM manages the following assets:

Assets Under Management	Assets
Discretionary Assets	\$3,580,300.00
Non-Discretionary Assets	\$0
Total	\$3,580,300.00

Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of AWM and the Client.

A. Fees for Advisory Services

Account Portfolio Management

Investment Advisory Fees are paid monthly in advance pursuant to the terms of the Investment Advisory Agreement. For clients who are custodied at Charles Schwab & Co., the billing will be quarterly in arrears. Investment Advisory Fees are based on the market value of assets under management on the last business day of each calendar month.

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Investment Management Services		
Assets Under Management	Annual Rate	Monthly Rate
Under \$100,000	2.50%	0.2083%
\$101,000 - \$250,000	2.25%	0.188%
\$250,001 - \$1,250,000	2.00%	0.167%
\$1,250,001 - \$2,500,000	1.75%	0.146%
\$2,500,001 - \$4,000,000	1.50%	0.125%
\$4,000,001 - \$5,000,000	1.25%	0.104%
\$5,000,001 - \$10,000,000	1.00%	0.083%
Over \$10,000,000	0.75%	0.063%

Investment Advisory Fees in the first month of service are prorated to the inception date of the account to the end of the first month. Fees may be negotiable at the discretion of the Advisor. All securities held in accounts managed by AWM will be independently valued by the designated Custodian. AWM will not have the authority or responsibility to value portfolio securities. The advisory fees on this platform are charged on a tiered basis. So, the Clients will pay the fee associated with the breakpoint level they have reached based on their portfolio value (e.g., a client account of \$1,500,000 would be charged 1.75% per annum or 0.146% per month).

Managed Accounts Programs

For Clients referred to an unaffiliated investment advisor (White Rock Capital), the Client's fee will be deducted from the Client's account[s] with the respective manager and a portion of the investment advisory fee will be provided to AWM. This arrangement will be custodied by LPL Financial. Please see Item 14 for additional details.

Client will pay AWM, an advisory fee based on the value of the assets being managed as follows:

Investment Management Services		
Assets Under Management	Annual Rate	Monthly Rate
All Assets	1.85%	0.154%

The advisory fee is payable monthly, in advance, based on the fair market value of portfolio assets under management in the Account at the beginning of the month. The advisory fees in the first month of the Agreement shall be prorated from the inception date to the end of the month. Advisory fees will generally be automatically deducted from the Client Account by the custodian. Fees may be negotiated at the sole discretion of the advisor. Of the 1.85% in advisory fees, Hansen & Associates will collect asset-based fees of 0.60% per annum.

For Clients referred to an unaffiliated investment advisor (Brookstone Capital), the Client's fee will be deducted from the Client's account[s] with the respective manager and a portion of the investment advisory fee will be provided to AWM. Please see Item 14 for additional details.

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Client will pay AWM, an advisory fee based on the value of the assets being managed as follows:

Investment Management Services		
Assets Under Management	Annual Rate	Monthly Rate
Under \$1,250,000	2.00%	0.167%
\$1,250,001 - \$2,500,000	1.75%	0.146%
\$2,500,000 - \$4,000,000	1.50%	0.125%
\$4,000,001 - \$5,000,000	1.25%	0.104%
\$5,000,001 - \$10,000,000	1.00%	0.083%
Over \$10,000,000	0.75%	0.063%

The advisory fee is payable monthly, in advance, based on the fair market value of portfolio assets under management in the Account at the beginning of the month. The advisory fees in the first month of the Agreement shall be prorated from the inception date to the end of the month. Advisory fees will generally be automatically deducted from the Client Account by the custodian. Fees may be negotiated at the sole discretion of the advisor.

Just as with Account Portfolio Management platform, the advisory fees on this platform are charged on a tiered basis. So, the Clients will pay the fee associated with the breakpoint level they have reached based on their portfolio value (e.g., a client account of \$1,500,000 would be charged 1.75% per annum or 0.146% per month). Under this platform, Brookstone Capital will receive an advisory fee of 0.45% with the remainder of the fee being remitted to AWM. So, using the previous example, Brookstone Capital would receive 0.45% of the 1.75% annual fee with AWM receiving 1.30% in advisory fees.

Expenses related to the ordinary servicing of the Account, including custody fees, security transaction fees, and/or program fees shall be paid by the Client. Other non-ordinary fees or fees incurred at the direction of the Client shall be paid by the Client. Operating fees of mutual funds and other investment product fees are deducted from the asset value of those investments as defined in the prospectus of the sponsor for each product.

The Advisor shall not be compensated on the basis of a share of capital gains realized upon sale securities or capital appreciation of the funds in which the Client is invested.

Financial Planning and Consulting Services

AWM offers financial planning or consulting services on an hourly basis. The fee for financial planning will be \$200 per hour, which may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours will be determined prior to establishing the advisory relationship.

Services may be rendered on a flat fee basis. The fee will be negotiated between the Client and AWM. Flat fees will never be more than \$5,000 per engagement.

The Advisor's fee is exclusive of, and in addition to brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services.

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B. Fee Billing

Account Portfolio Management

Investment Advisory Fees will be automatically deducted from the Client Account by the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client Account at the respective month end date. The amount due is calculated by applying the monthly rate (annual rate divided by 12) to the total assets under management with AWM on the last business day of each month. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting AWM to be paid directly from their accounts held by the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian.

Financial Planning and Consulting Services

As noted above, financial planning and consulting fee are invoiced by the Advisor and are due upon receipt. AWM may bill up to 50% of the estimated costs for hourly fees, or 50% of the negotiated flat fee, in advance of commencing any project work. There will never be an instance where the Advisor charges \$500 or more, six or more months in advance.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third-parties, other than AWM, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by AWM is separate and distinct from these custodian and execution fees.

In addition, all fees paid to AWM for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of AWM, but would not receive the services provided by AWM which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by AWM to fully understand the total fees to be paid.

D. Advance Payment of Fees and Termination

Account Portfolio Management

AWM is compensated for its services in advance the month in which investment advisory services are rendered. Clients may request to terminate their Investment Advisory Agreement with AWM, in whole or in part, by providing advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid Investment Advisory Fees from the effective date of termination to the end of the month. The Client's Investment Advisory Agreement with the Advisor is non-transferable without Client's written approval.

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Unaffiliated Money Management

In the event that a Client should wish to terminate their relationship with a managed accounts program or unaffiliated investment advisor, the terms for termination will be set forth in the respective agreements between the Client and those third parties. AWM will assist the Client with the termination and transition as appropriate.

Financial Planning and Consulting Services

In the event that a Client should wish to cancel the financial planning agreement under which any plan is being created, the Client shall be billed for actual hours logged on the planning project times the agreed upon hourly rate. Any surplus in the Advisor's possession as the result of collecting a deposit at the time of signing the financial planning agreement will be returned to the Client within 5 business days of cancellation.

Either party may terminate a planning or consulting agreement at any time by providing written notice to the other party within five (5) days of signing the Advisor's financial planning or consulting agreement. The Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Refunds will be given on a pro-rata basis.

E. Compensation for Sales of Securities

AWM does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the Investment Advisory Fees noted above.

Item 6 – Performance-Based Fees

AWM does not charge performance-based fees for its investment advisory services. The fees charged by AWM are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

AWM does not manage any proprietary investment funds and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

AWM provides investment advisory services to the following types of Clients:

- Individuals, Personal Trusts and Estates – private investors, investing their personal assets

The relative percentage of each type of Client is available on AWM's Form ADV Part 1. These percentages will change over time. AWM generally does not impose a minimum account size for establishing a relationship.

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

A. Methods of Analysis

Fundamental Analysis – AWM primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from AWM is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

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As noted above, AWM generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. AWM will typically hold all or a portion of a security for more than a year but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, AWM may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

Technical Analysis – Technical analysis is used for analyzing various economic and market trends. These trends, both short- and long-term, are used for determining specific trade entry and exit points and broad economic analysis. These trends may include put/call ratios, pricing trends, moving averages, volume, and changes in volume, among many others. These indicators do not speak to the financial health of a particular issuer. Rather, indicators are used to gauge market sentiment regarding a given issue. Technical analysis will be used primarily for the timing of a particular trade, and not security selection.

Investment Manager Due Diligence – AWM may invest its Clients' assets with independent managers that pursue investment approaches that are diversified among multiple strategies, asset classes, regions, industry sectors and securities. In selecting an Independent Manager and allocating assets to them, AWM considers both quantitative and qualitative factors including:

- Relative performance during various time periods and market cycles
- Industry reputation
- Experience and training of staff investment professionals
- The clarity of, and adherence to, a viable investment philosophy
- Risk management process
- Portfolio management capabilities
- Fee structure
- Any other factor deemed appropriate by AWM

AWM may use various databases of information in order to facilitate the discovery process on each investment manager utilized by AWM.

B. Investment Strategies

AWM structures portfolios using the various methodologies described above. Using a proprietary methodology, AWM believes that Clients will benefit from having a portfolio of holdings invested in a variety of assets classes. These portfolios are constructed based upon the unique needs of each individual Client. To the extent that these asset classes are non-correlated, the portfolio will experience investment returns with mitigated risk.

AWM will not pursue strategies that are speculative in nature.

C. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. AWM will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided

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information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact us at (941) 739-5006.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving AWM.

AWM and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter **143451** in the field labeled "Firm IARD/CRD Number". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions. You may also research the background of David Scott Appleby by selecting the Investment Adviser Representative and entering David Scott Appleby's Individual CRD# **3259135** in the field labeled "Individual CRD Number".

Item 10 – Other Financial Activities and Affiliations

Insurance Agency Affiliations

David Scott Appleby, President of AWM, has an affiliated insurance agency owned by David Scott Appleby. This activity is done separate and apart from David Scott Appleby's role with the AWM. As an insurance agent, David Scott Appleby may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by any affiliated Insurance agency or David Scott Appleby.

Tax Planning and Preparation

David Scott Appleby, President of AWM, may render tax preparation and planning services through an affiliated firm, BeeSure Tax Advisors. Via BeeSure Tax Advisors, David Scott Appleby offers consulting, planning and preparation with respect to the personal income taxes of individual taxpayers. Clients of AWM are under no obligation to use the services of BeeSure Tax Advisors.

Other Financial Services

David Scott Appleby, President of AWM, may render various financial services via an affiliated firm, BeeSure Financial Services. Via BeeSure Financial Services, David Scott Appleby offers diverse financial services. Clients of AWM are under no obligation to use the services of BeeSure Financial Services.

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Real Estate Holdings

David Scott Appleby, President of AWM, also owns a real estate holding company called Appex Investment Group, Inc. This entity owns the building that houses AWM's operations as well as other rent paying tenants. No investment advisory clients rent any space from David Scott Appleby or Appex Investment Group, Inc.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

A. Code of Ethics

AWM has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with AWM. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. AWM and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of AWM associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. AWM has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (941) 739-5006.

B. Personal Trading and Conflicts of Interest

AWM allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

At no time, will AWM or any associated person of AWM, transact in any security to the detriment of any Client.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

AWM does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize AWM to direct trades to this custodian as agreed in the Investment Advisory Agreement. Further, AWM does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

While AWM does not exercise discretion over the selection of the broker/dealer and/or custodian, it may recommend Charles Schwab & Co. or LPL Financial to Clients for execution and/or custodial services. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by AWM. AWM may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. AWM does not receive research services, other products, or compensation as a result of

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recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

AWM typically recommends to Clients that they established their brokerage account[s] at the institutional services division of a discount broker-dealer. Recommended broker-dealers will be an independent and unaffiliated SEC-registered broker-dealer and FINRA member. Typically, recommended broker-dealers offer to independent investment advisors services, which may include custody of securities, trade execution, clearance and settlement of transactions. AWM receives some benefits from recommended broker-dealers by way of a custodial agreement between AWM and the broker-dealer. AWM considers a number of factors in selecting and/or recommending brokers and custodians for its Clients' accounts, including, but not limited to, execution capability, experience and financial stability, reputation and the quality of services provided. AWM is not affiliated with, or related to, any broker-dealer.

1. *Soft Dollars* - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. AWM does not participate in soft dollar programs sponsored or offered by any broker-dealer.

2. *Brokerage Referrals* - AWM does not receive any compensation from any broker-dealer or any other entity in connection with the recommendation for establishing a brokerage account.

3. *Directed Brokerage* - AWM recommends the brokerage services of Charles Schwab & Co ("Schwab") or LPL Financial ("LPL"). We believe that Schwab and LPL provide quality execution services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by Schwab and LPL including the value of research provided, the firm's reputation, execution capabilities, commission rates, reporting capabilities, and responsiveness to our clients and our firm. In recognition of the value of research services and additional brokerage products and services Schwab and LPL provide, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

We routinely recommend that you direct our firm to execute transactions through Charles Schwab & Co or LPL. As such, we may be unable to achieve the most favorable execution of your transactions and you may pay higher brokerage commissions than you might otherwise pay through another broker-dealer that offers the same types of services.

You may direct us in writing to use a particular broker-dealer to execute some or all of the transactions for your account. If you do so, you are responsible for negotiating the terms and arrangements for the account with that broker-dealer. We may not be able to negotiate commissions, obtain volume discounts, or best execution. In addition, under these circumstances a difference in commission charges may exist between the commissions charged to clients who direct us to use a particular broker or dealer and other clients who do not direct us to use a particular broker or dealer.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. AWM will execute its transactions through an unaffiliated broker-dealer selected by the Client. AWM may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must

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be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

When AWM buys or sells the same security for two or more clients (including our personal accounts), we may place concurrent orders to be executed together as a single "block" in order to facilitate orderly and efficient execution. Each client account will be charged or credited with the average price per unit. We receive no additional compensation or remuneration of any kind because we aggregate client transactions, and no client is favored over any other client.

Item 13 – Review of Accounts

A. Frequency of Reviews

Accounts are monitored on a regular and continuous basis by David Scott Appleby, President of AWM. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A, each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify AWM if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by AWM

AWM may engage in promoter arrangements for client referrals. These individual promoters offer our services to the public. The Firm pays a referral fee to the promoter based on a portion of the management fees charged by the Firm and memorialized in a written agreement ("Promoter Agreement"). In all cases, the Firm will comply with the SEC Marketing Rule, state regulators and the client disclosure requirements. If a referred prospective client enters into an investment advisory agreement with the Firm, a referral fee is paid to the referring party. The referral relationship will not result in clients being charged any fees over and above the normal advisory fees charged for the advisory services provided. The Firm will pay the promoter their share of the total fee. The Promoter Agreement requires that the promoter be appropriately registered under federal and state securities laws where applicable. Clients receive all related agreements and disclosures prior to or at the time of entering into an Investment Advisory Agreement with the Firm.

B. Client Referrals from Solicitors

AWM does not engage paid solicitors for Client referrals.

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Item 15 – Custody

Any investment advisor having custody or access to customer funds or securities must comply with certain rules and regulations designed to protect the clients' assets. Because AWM has the ability to directly debit fees from client accounts with written authorization, the firm exercises limited custody. AWM does not have physical custody of any client funds and/or securities. Client funds and securities will be held with a bank, broker dealer, or other independent qualified custodian. You will receive account statements from the independent, qualified custodian holding your funds at least quarterly. The account statement from your custodian will indicate the amount of advisory fees deducted from your account(s) each billing cycle. Clients should carefully review statements received from the custodian. AWM also sends quarterly invoices detailing the manner and amount of advisory fees to all clients.

Some clients may execute limited powers of attorney or other standing letters of authorization that permit the firm to transfer money from their account with the client's independent qualified Custodian to third-parties. This authorization to direct the Custodian may be deemed to cause our firm to exercise limited custody over your funds or securities and for regulatory reporting purposes, we are required to keep track of the number of clients and accounts for which we may have this ability. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate any transfers that may have taken place within your account(s) each billing period. You should carefully review account statements for accuracy.

Item 16 – Investment Discretion

AWM generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by AWM. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by AWM will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

AWM does not accept proxy-voting responsibility for any Client.

Item 18 – Financial Information

Neither AWM, nor its management has any adverse financial situations that would reasonably impair the ability of AWM to meet all obligations to its Clients. Neither AWM, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. AWM is not required to deliver a balance sheet along with this Brochure as the firm does not collect advance fees for services to be performed six months or more in advance.

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Item 19 – Requirements for State Registered Advisors

A. Educational Background and Business Experience of Principal Officer

The President and Chief Compliance Officer of AWM is David Scott Appleby. Information regarding the formal education and background of David Scott Appleby is included in Item 2 of Part 2B below.

B. Other Business Activities of Principal Officer

David Scott Appleby has additional business activities that are detailed in Item 10 - Other Financial Activities and Affiliations.

C. Performance Fee Calculations

AWM does not charge performance-based fees for its investment advisory services. The fees charged by AWM are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

D. Disciplinary Information

No management person at AWM or AWM has been found liable in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

E. Material Relationships with Issuers of Securities

Neither AWM nor David Scott Appleby has any relationships or arrangements with issuers of securities.