

# Item 1

## Firm Brochure

(Part 2A for Form ADV)

February 25, 2022

This Brochure provides information about the qualifications and business practices of Alliant Wealth Advisors. If you have any questions about the contents of this Brochure, please contact us at (703) 878-9050 and/or [jfrisch@alliantwealth.com](mailto:jfrisch@alliantwealth.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Alliant Wealth Advisors is an investment advisor registered with the United States Securities and Exchange Commission (SEC). Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information about which you determine to hire or retain an Advisor.

Additional information about Alliant Wealth Advisors, CRD # 116360 also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



Simplifying Your Financial Path

Manassas, VA

9161 Liberia Avenue | Suite 100

Manassas, VA 20110

Tel: 703.878.9050

Reston, VA

11921 Freedom Drive | Suite

550 Reston, VA 20190

Tel: 703.904.4388

## **Item 2 - Material Changes**

Item 1 - Alliant Wealth Advisors withdrew registration from the state of Colorado and closed the Colorado location.

## Item 3 – Table of Contents

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

## Item 4 – Advisory Business

Millennium Capital Management Corporation dba Alliant Wealth Advisors was founded in 1995 by John A. Frisch, CPA/PFS, CFP®, AIF®, PPC™, who is the sole and principal owner of the advisory firm. Alliant Wealth Advisors' mission is twofold. For Family Wealth Clients, our mission is to oversee and coordinate the finances for a select group of families. For Employer Retirement Plan Clients, our mission is to improve the quality and compliance of their plans.

### Family Wealth Clients:

Alliant Wealth Advisors typically provides a structured process to address the following four components of wealth:

- Wealth enhancement – Investing as described below, tax avoidance and cash flow management
- Wealth protection – Reducing exposure to unnecessary risks and liabilities
- Wealth transfer – Coordinating financial activities with estate planning
- Charitable giving – Aligning philanthropic activities with overall wealth management

However, Alliant Wealth Advisors assumes that every client is unique; every client has varying needs and objectives; and no two clients share the same goals and circumstances. To ensure appropriate care for each client, Alliant Wealth Advisors prepares a customized Wealth Management Plan and implements it according to these broad services:

- Relationship Management – Maintaining client relationships with client family members as necessary and relationships with the client's other professional advisors such as their CPA, attorney, and insurance specialist, to ensure ongoing discovery and management of the client's individual goals and challenges
- Investment Management – Ongoing investment consulting and management
- Advanced Planning – Coordinated oversight to integrate wealth enhancement, wealth protection, wealth transfer and charitable giving

Alliant Wealth Advisors' Investment Management is based on tightly integrating investment activities within the client's overall wealth goals. Accordingly, Alliant Wealth Advisors seeks to help clients capture available market returns through cost-effective, long-term investments deemed appropriate for their distinct goals and risk tolerances.

As such, Alliant Wealth Advisors builds client portfolios largely via low-cost, no-load institutional mutual funds and exchange-traded funds, (ETFs) that offer reliable exposure to specific components of the market – components known as “asset classes”. Specifically:

- Alliant Wealth Advisors selects various mutual funds and ETFs offered through multiple custodians.
- Alliant Wealth Advisors has developed asset allocation guidelines for initial portfolio construction, which it customizes and updates based on individual evolving client needs.
- For each client, Alliant Wealth Advisors recommends a distinct asset class allocation and receives discretionary authority to buy and sell securities in the client’s accounts, consistent with the client’s approved strategy.

Clients’ managed investments are restricted to the securities and allocations recommended by, Alliant Wealth Advisors according to the client’s approved strategy. If there are assets that a client wishes to invest outside of these parameters, they are unmanaged and not subject to Alliant Wealth Advisors’ management fees. Clients may restrict Alliant Wealth Advisors from including certain securities or types of securities in the client’s portfolio.

#### Employer Retirement Plan Clients:

Alliant Wealth Advisors’ “401(k) Qualified Plans” comprehensively services employer 401(k) and other defined contribution retirement plans by:

- Providing professionally managed investment models
- Acting as plan’s ERISA Section 3(38) investment fiduciary thereby significantly limiting employer liability
- Offering plan employees information to help them in determining their investment selections
- Guiding employers on other compliance issues and
- Coordinating the team of service providers that provides the back-end support of the employer plan(s).
- Offering plan employees monthly education webinars directed at helping them make informed decisions about retirement.

Alliant Wealth Advisors’ 401(k) Qualified Plans typically services plans with assets above \$3 million however, exceptions may occur.

Alliant Wealth Advisors does not participate in a wrap-fee program. As of December 31, 2021, Alliant Wealth Advisors has \$305,409,301 client assets under management. Of this total, \$286,878,987 was on a discretionary basis and \$18,530,314 on a non-discretionary basis.

## Item 5 – Fees and Compensation

Alliant Wealth Advisors offers investment advisory services to both Family Wealth Clients and Employer Retirement Plan Sponsored Clients for a percentage of assets under management. The basic fee schedules for wealth management services are as follows:

### Family Wealth Clients:

Assets Under Management	Annual Fee
First \$1 million (\$1 million and less)	1.25%
Next \$1 million (\$1 million to \$2 million)	1.00%
Next \$8 million (\$2 million to \$10 million)	.50%
Next \$5 million (\$10 million to \$15 million)	.40%
Next \$5 million (\$15 million to \$20 million)	.30%
Over \$20 million	.25%
Minimum Annual Fee	\$5,000

The above fees are billed quarterly in advance and are based on the account asset value at the time the account is established and, thereafter, on the last business day of the immediately preceding quarter. Fees are deducted directly from client accounts (clients may not select direct billing as payment method).

Alliant Wealth Advisors' services are guided by an Advisory Agreement, signed by both parties. This agreement may be terminated at any time by either party by providing 15 days written notice to the other party. Clients may receive a refund for the prepaid fees based on the number of calendar days remaining in the prepaid quarter after the date of liquidation, divided by the number of calendar days in the quarter.

All fees described in this document are subject to negotiation. The specific manner in which fees are charged by Alliant Wealth Advisors is established in a client's written Advisory Agreement with Alliant Wealth Advisors. Clients and prospects should be aware that lower fees for comparable services may be available from other sources. Alliant Wealth Advisors' fees are in addition to brokerage commissions, transaction fees,

and other related costs and expenses, which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment providers and other third parties. Such charges may include redemption fees, odd-lot differentials, wire transfer and electronic fund fees, and other fees on accounts and securities transactions. Mutual funds and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Alliant Wealth Advisors' fee, and Alliant Wealth Advisors shall not receive any portion of these commissions, fees, and costs. Additionally, Alliant Wealth Advisors and the supervised persons of Alliant Wealth Advisors do not accept compensation for the sale of securities or other investment products. Item 12 further describes the factors that Alliant Wealth Advisors considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

Employer Retirement Plan Clients:

Assets Under Management	Annual Fee
First \$1 million	.90%
Next \$2 million	.70%
Next \$2 million	.50%
Next \$15 million	.35%

Amounts above \$20 million are negotiable. Minimum annual fee is \$20,000. There is no start-up or termination fee, nor will the Plan be subject to any penalties.

The above fees are billed quarterly in arrears and are based on the account asset value on the last business day of the immediately preceding quarter. Fees are deducted directly from client accounts (clients may not select direct billing as payment method).

Alliant Wealth Advisors' services are guided by an Investment Advisory Services Agreement, signed by both Alliant Wealth Advisors and the Plan Sponsor of the Employer Retirement Plan. Plan Sponsors may terminate their Investment Advisory Services Agreement for any reason upon written notice to Alliant Wealth Advisors. All fees described in this document are subject to negotiation. The specific manner in which fees are charged by Alliant Wealth Advisors is established in a client's written Advisory Agreement with Alliant Wealth Advisors.

Alliant Wealth Advisors' fees are in addition to brokerage commissions, transaction fees, and other related costs and expenses, which shall be incurred by the client. Clients may

incur certain charges imposed by custodians, brokers, recordkeepers, third party administrators, third party investment providers and other third parties. Mutual funds and exchange-traded funds also charge investment management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Alliant Wealth Advisors' fee, and Alliant Wealth Advisors shall not receive any portion of these commissions, fees, and costs.

Alliant Wealth Advisors is deemed to be a Fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. Alliant Wealth Advisors only charges asset management or financial planning fees for our services and does not receive any commissions, 12b-1 fees or other forms compensation.

### Rollover Recommendations

As part of our investment advisory services to you, we may recommend that you roll assets from your employer's retirement plan, such as a 401(k), 457, or ERISA 403(b) account (collectively, a "Plan Account"), to an individual retirement account, such as a SIMPLE IRA, SEP IRA, Traditional IRA, or Roth IRA (collectively, an "IRA Account") that we will manage on your behalf. We may also recommend rollovers from IRA Accounts to Plan Accounts, from Plan Accounts to Plan Accounts, and from IRA Accounts to IRA Accounts. When we provide any of the foregoing rollover recommendations we are acting as fiduciaries within the meaning of Title I of the ERISA and/or the Internal Revenue Code ("IRC"), as applicable, which are laws governing retirement accounts.

If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset-based fee as set forth in the advisory agreement you executed with our firm. This creates a conflict of interest because it creates a financial incentive for our firm to recommend the rollover to you (*i.e.*, receipt of additional fee-based compensation). You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm. Due to the foregoing conflict of interest, when we make rollover recommendations, we operate under a special rule that requires us to act in your best interests and not put our interests ahead of yours.



Under this special rule's provisions, we must:

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

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of a rollover.

Note that an employee will typically have four options in this situation:

1. leaving the funds in your employer's (former employer's) plan;
2. moving the funds to a new employer's retirement plan;
3. cashing out and taking a taxable distribution from the plan; or
4. rolling the funds into an IRA rollover account.

Each of these options has positives and negatives. Because of that, along with the importance of understanding the differences between these types of accounts, we will provide you with written explanation of the advantages and disadvantages of both account types and the basis for our belief that the rollover transaction we recommend is in your best interests.

As an alternative to providing you with a rollover recommendation, we may instead take an entirely educational approach in accordance with the U.S. Department of Labor's Interpretive Bulletin 96-1. Under this approach, our role will be limited only to providing you with general educational materials regarding the pros and cons of rollover transactions. We will make no recommendation to you regarding the prospective rollover of your assets and you are advised to speak with your trusted tax and legal advisors with respect to rollover decisions. As part of this educational approach, we will provide you with materials discussing some or all of the following topics: the general pros and cons of rollover transactions; the benefits of retirement plan participation; the impact of pre-retirement withdrawals on retirement income; the investment options available inside your Plan Account; and high level discussion of general investment concepts (*e.g.*, risk

versus return, the benefits of diversification and asset allocation, historical returns of certain asset classes, etc.). We may also provide you with questionnaires and/or interactive investment materials that may provide a means for you to independently determine your future retirement income needs and to assess the impact of different asset allocations on your retirement income. You will make the final rollover decision.

## **Item 6 – Performance-Based Fees**

Alliant Wealth Advisors does not charge or accept any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

## **Item 7 – Types of Clients**

Alliant Wealth Advisors provides wealth management services to individuals (to include individual trusts and estates) referred to as Family Wealth Clients, and investment and compliance services to business retirement plans referred to as Employer Retirement Plan Clients.

Alliant Wealth Advisors targets Employer Retirement Plan Clients in excess of \$3 million of plan assets. Alliant Wealth Advisors does make exceptions, however, when there is an unusually good fit on both sides (between client and investment advisor).

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

Alliant Wealth Advisors' security analysis methods include the selection of mutual funds and exchange-traded funds (ETFs) based on proprietary criteria applied to a Morningstar Office research database, Morningstar Direct research database and the fi360 Toolkit. Other databases may also be used. Mutual Funds and ETFs are also selected based on information at issuer websites.

Alliant Wealth Advisors' main sources of information include research materials prepared by others.

Investment strategies used to implement any investment advice given to clients include, Modern Portfolio Theory (MPT) asset allocation techniques and the assumption that the portfolio will be invested for the long-term (at least 5 years).

MPT is an investment theory which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets. An "efficient frontier" of

optimal portfolios is constructed which offers the maximum possible expected return for a given level of risk. See Harry Markowitz's paper, "Portfolio Selection", published in 1952 by the *Journal of Finance*.

Alliant Wealth Advisors advises clients that all investment programs have certain risks that are born by the investor. The various investment approaches keep the risk of material loss in mind. However, clients face investment risk including the following: Loss of Principal, Interest Rate Risk, Credit Risk, Economic Risk, Currency Risk, Market Risk, Inflation Risk, Reinvestment Risk, and Liquidity Risk.

## **Item 9 – Disciplinary Information**

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Alliant Wealth Advisors or the integrity of Alliant Wealth Advisors' management. Alliant Wealth Advisors has never been involved in legal or disciplinary events.

## **Item 10 – Other Financial Industry Activities and Affiliations**

As previously stated in Item 4, in addition to investing consulting/management services, Alliant Wealth Advisors provides advanced planning to clients. Alliant Wealth Advisors has signed a Business Continuation Memorandum of Understanding with another financial advisory firm to support Alliant Wealth Advisors in the event of John A. Frisch's serious disability or death.

John A. Frisch is licensed in the states of Maryland and Virginia as a Certified Public Accountant. Mr. Frisch does not have signature authority for client accounts.

Alliant Wealth Advisors and its' management personnel are not registered or have an application pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Alliant Wealth Advisors does not select other advisors for its clients.

## **Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

Alliant Wealth Advisors has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients.

The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Alliant Wealth Advisors must acknowledge the terms of the Code of Ethics annually, or as amended.

Alliant Wealth Advisors anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Alliant Wealth Advisors has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Alliant Wealth Advisors, its affiliates and/or clients, directly or indirectly, have a position of interest. Alliant Wealth Advisors' employees and persons associated with Alliant Wealth Advisors are required to purchase or sell securities for their personal accounts only after trading of that same security has been completed in the client accounts. Personal accounts of the employee include all accounts for the dependent family members living within the employee's household and accounts over which the employee has authority even though the account owner does not live within the same household as the employee. This policy is outlined in the Alliant Wealth Advisors' Code of Ethics.

Subject to satisfying this policy and applicable laws, officers, directors and employees of Alliant Wealth Advisors and its affiliates may trade for their own accounts in securities, which are recommended to and/or purchased for Alliant Wealth Advisors' clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Alliant Wealth Advisors will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code, certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Alliant Wealth Advisors' clients. Employee trading is continually monitored under the Code of Ethics, to reasonably prevent conflicts of interest between Alliant Wealth Advisors and its clients.

Alliant Wealth Advisors' clients or prospective clients may request a copy of the firm's Code of Ethics by contacting John A. Frisch at (703) 878-9050 and/or [jfrisch@alliantwealth.com](mailto:jfrisch@alliantwealth.com).

## Item 12 – Brokerage Practices

Alliant Wealth Advisors seeks best execution in all transactions. Various factors are considered in selecting a broker, including: financial condition; acceptable record keeping; ability to obtain best price; ability to provide client transaction history electronically, knowledge of market, securities and industries; commission structure; quality of research; reputation and integrity; and no transaction fee, mutual and exchange-traded funds.

Based on these criteria, Alliant Wealth Advisors has selected Raymond James & Associates, AdvisorTrust, Inc., Charles Schwab Bank, Matrix Trust Company, and/or TD Ameritrade Institutional as the brokers and custodians for all Family Wealth and some Employer Retirement Plan clients. Alliant Wealth Advisors participates in the custodians' institutional customer programs.

There is no direct link between Alliant Wealth Advisors' participation in the program and the investment advice it gives to its clients, although Alliant Wealth Advisors receives economic benefits through its participation in the programs that are typically not available to Raymond James & Associates, AdvisorTrust, Inc., Charles Schwab Bank, Matrix Trust Company, and/or TD Ameritrade Institutional retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Alliant Wealth Advisors by third party vendors.

Raymond James & Associates, AdvisorTrust, Inc., Charles Schwab Bank, Matrix Trust Company, and/or TD Ameritrade Institutional may also have paid for business consulting and professional services received by Alliant Wealth Advisors' related persons. Some of the products and services made available by Raymond James & Associates, AdvisorTrust, Inc., Charles Schwab Bank, Matrix Trust Company, and/or TD Ameritrade Institutional through the programs may benefit Alliant Wealth Advisors but may not benefit its client accounts. These products or services may assist Alliant Wealth Advisors in managing and administering client accounts, including accounts not

maintained at Raymond James & Associates, AdvisorTrust, Inc., Charles Schwab Bank, Matrix Trust Company, and/or TD Ameritrade Institutional. Other services made available by Raymond James & Associates, AdvisorTrust, Inc., Charles Schwab Bank, Matrix Trust Company, and/or TD Ameritrade Institutional are intended to help Alliant Wealth Advisors manage and further develop its business enterprise.

The benefits received by Alliant Wealth Advisors or its personnel through participation in the programs do not depend on the amount of brokerage transactions directed to Raymond James & Associates, AdvisorTrust, Inc., Charles Schwab Bank, Matrix Trust Company, and/or TD Ameritrade Institutional. As part of its fiduciary duties to clients, the firm endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Alliant Wealth Advisors or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Alliant Wealth Advisors' choice of Raymond James & Associates, AdvisorTrust, Inc., Charles Schwab Bank, Matrix Trust Company, and/or TD Ameritrade Institutional for custody and brokerage services.

Alliant Wealth Advisors has no written or verbal arrangement whereby it receives soft dollars with Raymond James & Associates, AdvisorTrust, Inc., Charles Schwab Bank, Matrix Trust Company, and/or TD Ameritrade Institutional s or any other broker/dealer. Alliant Wealth Advisors does not receive client referrals from Raymond James & Associates, AdvisorTrust, Inc., Charles Schwab Bank, Matrix Trust Company, and/or TD Ameritrade Institutional or any other broker/dealer.

## **Item 13 – Review of Accounts**

### Family Wealth Clients:

Alliant Wealth Advisors reviews client investment account positions daily to determine if a client's portfolio needs rebalancing. Investments are reviewed quarterly. A client's portfolio design is reviewed when/if triggered by significant changes in personal circumstances, the general economy, or tax laws, not by market fluctuation.

Alliant Wealth Advisors has one reviewer, John A. Frisch, CPA/PFS, CFP®, AIF®, PPC® President. John A. Frisch performs reviewer services for all clients.

Each quarter, Alliant Wealth Advisors provides clients with a written Quarterly Investment Review and a written Quarterly Account Statement, which lists period performance, client holdings and transactions. Alliant Wealth Advisors also provides clients with a written annual capital gains and loss report.

In addition, clients will receive monthly account statements from custodian, Raymond James & Associates, AdvisorTrust, Inc., Charles Schwab Bank, Matrix Trust Company, and/or TD Ameritrade Institutional, as well as trade confirmations as they occur. Clients will annually receive Form 1099 from Raymond James & Associates, AdvisorTrust, Inc., Charles Schwab Bank, Matrix Trust Company, and/or TD Ameritrade Institutional, which should be used in conjunction with the annual capital gains and loss report received from Alliant Wealth Advisors in completing client's annual IRS tax forms.

Employer Retirement Plan Clients:

Alliant Wealth Advisors does not review individual retirement plan accounts for Employer Retirement Plan Clients' employees. Alliant Wealth Advisors does rebalance Employer Retirement Plan's managed investment models when necessary and as determined by Alliant Wealth Advisors.

## **Item 14 – Client Referrals and Other Compensation**

Alliant Wealth Advisors does not provide investment advice or other advisory services for economic benefit to someone who is not a client. Alliant Wealth Advisors will directly compensate Solicitors for client referrals. Alliant Wealth Advisors agrees to pay any such Solicitor a cash referral fee generated from Alliant Wealth Advisors' asset management program. Referral fees payable to Solicitor shall be based on the value of the assets of the clients referred to and under the control of Alliant Wealth Advisors. There will be no fee differential charged to the client as a result of Alliant Wealth Advisors' relationship with the solicitor.

## **Item 15 – Custody**

Alliant Wealth Advisors' client assets are generally held at independent third-party custodians Raymond James & Associates, AdvisorTrust, Inc., Charles Schwab Bank, Matrix Trust Company, and/or TD Ameritrade Institutional. Other than having the ability to deduct advisory fees directly from client accounts held at those custodians along with the ability to disburse or transfer certain funds pursuant to Standing Letters of Authorization executed by Clients, Alliant Wealth Advisors does not have any custody of client assets.

Alliant Wealth Advisors sends information to the custodian, Raymond James & Associates, and/or TD Ameritrade Institutional for Family Wealth clients to include the

amount of the advisory fee, the date and the specific manner in which the advisory fee was calculated. The custodian then deducts the advisory fee from the client's assets. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of the advisory fees paid directly to Alliant Wealth Advisors. Clients also receive a quarterly billing statement from Alliant Wealth Advisors.

It is the client's responsibility to verify the accuracy of the fee calculation. The custodian (Raymond James & Associates, AdvisorTrust, Inc., Charles Schwab Bank, Matrix Trust Company, and/or TD Ameritrade Institutional) will not determine whether the fee is properly calculated. The client agreement authorizes Alliant Wealth Advisors to deduct advisory fees directly from the client's account at the custodian (Raymond James & Associates, AdvisorTrust, Inc., Charles Schwab Bank, Matrix Trust Company, and/or TD Ameritrade Institutional). With the exception of the ability to debit client account for advisory fees, Alliant Wealth Advisors does not and will not have custody of clients' funds or securities. Client assets shall be held in the custody of a bank, trust company or brokerage firm agreed upon by the client and Alliant Wealth Advisors.

Family Wealth Clients Only: Alliant Wealth Advisors urges clients to carefully review brokerage statements received and compare such official custodial records to the account statements provided by Alliant Wealth Advisors. Alliant Wealth Advisors' statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## **Item 16 – Investment Discretion**

Alliant Wealth Advisors receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. A Limited Power of Attorney is obtained from each client allowing Alliant Wealth Advisors to access client account information and execute trades on client's behalf. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Alliant Wealth Advisors observes the investment policies, limitations, and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to Alliant Wealth Advisors in writing.



## **Item 17 – Voting Client Securities**

As a matter of firm policy and practice, Alliant Wealth Advisors does not have any authority to and does not vote proxies on behalf of family wealth advisory clients and does not provide advice to those clients about how to vote proxies. Those clients retain the responsibility for receiving and voting proxies for all securities maintained in client portfolios and will be required to ensure that proxy materials are sent directly to them. If any proxy materials are received on behalf of client accounts, they are sent directly to the client or a designated representative of the client who is responsible for voting the proxy.

For select 401(k) and employer-sponsored retirement plan clients, only where expressly authorized by the client and agreed to by the firm, Alliant Wealth Advisors may vote proxies or review those proxies and provide advice related to voting for securities held by our clients for which we serve as the investment advisor. Alliant Wealth Advisors has adopted a Proxy Voting Policy, which details steps taken to ensure that proxies are voted in a manner that seeks to ensure the best interests of the client are taken into consideration and avoid potential conflicts of interest. The Proxy Voting Policy is available to clients upon request.

## **Item 18 – Financial Information**

Registered investment advisors are required in this Item to provide you with certain financial information or disclosures about Alliant Wealth Advisors' financial condition. Alliant Wealth Advisors has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

Alliant Wealth Advisors does not require the prepayment of fees of more than \$500 per client for six months or more in advance.