

BANORTE ASSET MANAGEMENT, INC.

5075 Westheimer, Suite 975W Houston, TX 77056

Part 2A of Form ADV: Firm Brochure

December 11, 2023

This disclosure brochure provides information about the qualifications and business practices of Banorte Asset Management, Inc. (hereinafter sometimes referred to as “BAM” or the “Firm”), a Registered Investment Adviser. Registration does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, contact us at 713-980-4600 or Compliance@banortesecurities.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“U.S. SEC”) or by any state securities authority.

Additional information about Banorte Asset Management, Inc. also is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The Firm’s CRD number is 290555.

Item 2 – Material Changes

BAM is required in this Item to identify and discuss any material changes made to this Brochure since the last annual update, which was filed on March 30, 2023.

- Under “Brokerage Practices,” we:
 - Updated this item to reflect additional disclosures about BAM’s use of its affiliated broker-dealer.

- Under “Fees and Compensation,” we:
 - Updated this item to disclosure compensation derived from Sweep Money Market Fund balances in client accounts.
 - Updated this item to disclose that we may purchase bonds for client accounts that are issued by our ultimate parent company.
 - Updated this item to expand on the list of additional fees and expenses charged to clients.
 - Updated this item to reflect a new required minimum account size for “BAM Traditional” advisory services from \$300,000 to \$50,000.

- Under “Disciplinary Information,” we:
 - Updated BAM’s disciplinary history to include details of Banorte’s violation of Section 206(4) of the Advisers Act and Rule 206(4)-1(d)(6) (the “Amended Marketing Rule”).

- Under “Client Referrals and Other Compensation,” we:
 - Updated this item to clarify how we compensate our affiliated bank, Banco Mercantil del Norte for referrals.

BAM encourages all current advisory customers and prospective customers to read this Brochure in its entirety and discuss any questions you may have with your IAR. If BAM makes any material changes to this Brochure, this Item will be revised to include a summary of the changes.

BAM, at any time, may update this Brochure and either send you a copy or offer to send you a copy (either by electronic means (email) or in hard copy form).

Obtain a copy of this Firm Brochure, in its most updated version, by contacting us at 713- 980-4600 or through e-mail, by contacting: Compliance@banortesecurities.com.

Item 3 – Table of Contents

Item 2 – Material Changes.....	2
Item 3 – Table of Contents.....	3
Item 4 – Advisory Business.....	4
Item 5 – Fees and Compensation.....	5
Item 6 – Performance-Based Fees and Side-by-Side Management.....	7
Item 7 – Types of Clients.....	8
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss.....	9
Item 9 – Disciplinary Information.....	11
Item 10 – Other Financial Industry Activities and Affiliations.....	12
Item 11 - Code of Ethics, Participation, or Interest in Client Transactions and Personal Trading.....	13
Item 12 – Brokerage Practices.....	14
Item 13 – Review of Accounts.....	15
Item 14 – Client Referrals and Other Compensation.....	16
Item 15 – Custody.....	17
Item 16 – Investment Discretion.....	18
Item 17 – Voting Client Securities.....	19
Item 18 – Financial Information.....	20

Item 4 – Advisory Business

BAM is registered with the SEC as an investment adviser with its principal place of business located in Houston, Texas, USA. BAM began conducting business in 2001.

Listed below are the Firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Banorte Securities Holdings International Inc., sole shareholder of applicant.
In addition, the following information identifies publicly held subsidiaries that indirectly own 25% or more of the Firm:
- Casa de Bolsa Banorte S.A. de C.V., sole shareholder of AFIN INTERNATIONAL HOLDINGS, INC.
- Grupo Financiero Banorte, S.A.B. de C.V., sole shareholder of Casa de Bolsa Banorte S.A. de C.V.

BAM offers the following products and services to our clients:

ADVISORY SERVICES - PORTFOLIO MANAGEMENT

The Firm provides continuous asset management of client assets.

Apart from the digital, discretionary account management provided through our BAM Digital division (see Wrap Fee Program Brochure in IARD), we manage our advisory accounts on both a discretionary and non-discretionary basis. Collectively, the non-discretionary and discretionary advisory accounts are referred to as "BAM Traditional." Account supervision for BAM Traditional accounts is guided by the client's stated objectives (i.e., growth, income, speculation, etc.).

LIMITATIONS: Individuals of BAM are registered as representatives of an affiliated broker-dealer and also as insurance agents. While this set of arrangements may connote that a conflict of interest could exist, strict procedures are in place to ensure that BAM's Investment Advisor Representatives ("IAR") always act in the best interest of their clients and place their interest above their own and that of the firms they represent.

AMOUNT OF MANAGED ASSETS

As of November 30, 2023, we were managing \$87,295,846 of our clients' assets on a discretionary basis. As of November 30, 2023, we were managing \$146,046,489 of our clients' assets on a non-discretionary basis. As of November 30, 2023, we were managing \$233,342,335 of our client's assets on a discretionary and non-discretionary" basis.

INSURANCE POLICIES

BAM is licensed as a life insurance agency with the State of Texas, and as such those persons licensed as insurance agents with BAM may offer clients life insurance products underwritten by those insurance companies with whom BAM has an agreement.

Item 5 – Fees and Compensation

PORTFOLIO MANAGEMENT SERVICES FEES

Our annual fees for Portfolio Management Services are based upon a percentage of assets under management and generally range from **0.85%** to **1.85%**.

The required minimum Account size for “BAM Traditional” advisory services under this Agreement is **\$50,000.00**. This account size may be negotiable under certain circumstances. Separately, the Wrap Fee account minimum account size **\$10,000.00** and pertains to the BAM Digital platform. More information regarding the Wrap Fee program can be found in Appendix 1.

The Adviser’s annual fee for investment management services shall be based on a flat fee percentage structure of the total amount of assets under management (“AUM”) held in the Account and computed based on the Net Liquidation Value (“NLV”) of the account applied daily on a 365 calendar days basis. The Net Liquidation Value of the Account for any given day is equal to the ending equity value of the Account on that day. This annual fee shall be prorated and paid quarterly, in arrears, based upon the AUM held in the Account on the last business day of the previous quarter. All fees may be collected by the Adviser from the amount of any contribution or transfer, from available cash in the Account(s), or from the liquidation of such assets held in the Account(s) as are necessary to pay such fees in full.

BAM’s advisory fees are negotiable.

GENERAL INFORMATION

Termination of the Advisory Relationship: This Agreement will continue in effect until terminated by either party by written notice to the other (email notice will not suffice), which written notice must be signed by the terminating party. Termination of this Agreement by Client shall take effect no later than the seventh (7th) business day following receipt by Adviser of written notice of termination. Termination of this Agreement by Adviser of this Agreement shall take effect at least thirty (30) calendar days following receipt by Client of written notice of termination. Termination of this Agreement will not affect (i) the validity of any action previously taken by Adviser under this Agreement; (ii) liabilities or obligations of the parties from transactions initiated before termination of this Agreement; or (iii) Client’s obligation to pay advisory fees (prorated through the date of termination). Upon the termination of this Agreement, Adviser will have no obligation to recommend or take any action with regard to the securities, cash or other investments in the Account and will refund any unearned advisory fees.

Mutual Fund Fees: All fees paid to BAM for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses for mutual funds are described in each fund’s prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client’s financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Fixed Income Securities – Conflicts of Interest: We may purchase bonds for client accounts that are issued by our ultimate parent company, that this is a conflict of interest, but we mitigate the conflict because we aren’t required to buy such bonds for client accounts. Regarding such bonds;

we believe they are high quality; and we don't charge different commissions or fees than we do for non-Banorte bonds.

Wrap Fee Programs and Separately Managed Account Fees: Clients participating in separately managed account programs may be charged various program fees in addition to the advisory fee charged by the Firm. Such fees may include the investment advisory fees of the independent advisors, which may be charged as part of a wrap fee arrangement. In a wrap fee arrangement, clients pay a single fee for advisory, brokerage and custodial services. Client's portfolio transactions may be executed without commission charge in a wrap fee arrangement. In evaluating such an arrangement, the client should also consider that, depending upon the level of the wrap fee charged by the broker-dealer, the amount of portfolio activity in the client's account, and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately. We will review with clients any separate program fees that may be charged to clients. Please see the Wrap Fee Appendix 1 following this Firm Brochure.

Additional Fees and Expenses: In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Examples of transaction fees include, but are not limited to ticket charges, paper fees, wire fees and Non-US foreign account fees. Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

Advisory Fees in General: Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisors for similar or lower fees.

Limited Prepayment of Fees: Under no circumstances do we require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

Additional Compensation: Some of the investment managers and other service providers for BAM's advisory programs, such as the clearing firm, share with BSI in BSI's capacity as a broker-dealer in connection with your advisory account assets, a part of the revenue, such as 12b-1 fees, they earn on your assets, including on assets in a Sweep Money Market Fund vehicle for your assets. Although none of this revenue is shared with BAM, these payments to BSI, a BAM affiliate, create an incentive for BAM to select or recommend those investment managers and service providers for your advisory account assets and to encourage you to increase the amount of assets in your account.

INSURANCE POLICY FEES

Fees that are assessed for the sale of insurance policies are generally those which are standard rates in the industry. All insurance agents of BAM are also the IARs who serve clients in a portfolio management capacity. As such, the offering of life insurance products is typically seen to be a complimentary service to clients, as opposed to the main line business of BAM, which is portfolio management.

Item 6 – Performance-Based Fees and Side-by-Side Management

BAM does not charge any performance-based fees.

Item 7 – Types of Clients

BAM's client base is made up primarily of clients who reside in Latin America, the majority of whom are Mexican citizens.

These clients are typically individuals, high-net-worth individuals, trusts, estates, charitable organizations, corporations, and other business entities.

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

INVESTMENT STRATEGY OVERVIEW AND METHODS OF ANALYSIS

BAM's investment strategy is summarized below and detailed in the governing documents as negotiated with each Client.

BAM seeks to produce superior, risk adjusted returns through the Portfolio Management Services for each of its clients by employing various investments including UCITs Open Ended Mutual Funds, UCITs Exchange Traded Funds (ETFs), corporate debt securities, U.S. government securities, ETNs, alternatives approved for international clients and structured notes.

With regard to accounts managed on a fully discretionary basis, clients are consulted with regard to a variety of unique factors characterized by their individual circumstance, needs and investment objectives. An Investment Policy Statement is put into place to lay the groundwork for portfolio construction and approach to markets for a given client's investment management arrangement.

BAM offers six (6) available models that can be utilized in varying percentage amounts with the goal of achieving desired investment objectives. The aforementioned six portfolio models are not exclusive, and clients are able to customize, in conjunction with their IAR, how they would like to have their portfolio account managed.

The six (6) model portfolios available are: (1) Ultra Short Duration portfolio, (2) the Conservative portfolio 80RF20RV, (3) the Growth Portfolio 20RF80RV (4) the Moderate Portfolio 60RF40RV (5) the Fixed Income Portfolio; and (6) Equity Portfolio. The Ultra Short Duration portfolio invests in government and corporate fixed income securities which are U.S. dollar denominated and which have readily available liquidity. The Conservative Portfolio is designed to generate modest returns with relatively low risk to principal. The Growth Portfolio is designed to maximize long-term potential growth of principal. The Fixed Income Portfolio is designed for investment in fixed income asset classes and the Equity Portfolio is designed to maximize long-term potential growth of principal through investments in the equity markets.

We also provide non-discretionary asset management services as agreed-to in writing with a client and consistent with a client's investment objectives, risk tolerance, and time horizons, among other considerations. For non-discretionary accounts, strategies are discussed with the customer prior to order entry.

RISK OF LOSS

Risks for all forms of analysis: All analysis methods rely on the assumption that the companies whose securities that are purchased or sold, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that an analysis may be compromised by inaccurate or misleading information.

Investment and Trading Risks: All securities investments bear a significant risk of capital loss. No guarantee or representation is made that the Clients' trading programs will be successful or that the Clients will not incur losses.

Investment Judgment; Market Risk: The profitability of a significant portion of the BAM's investment program depends to a great extent upon correctly assessing the future course of the price movements of securities and other investments. There can be no assurance that BAM will be able to predict accurately these price movements.

Inflation: Were significant inflation to occur, the effect on BAM's strategy could be materially adverse — while unpredictable, stocks have traditionally been considered a form of "hedge" against inflation, but that is not always the case (particularly in the case of any individual stock).

Foreign Investment Risk – Foreign investments face the potential of heightened illiquidity, greater price volatility and adverse effects of political, regulatory, tax, currency, economic or other macroeconomic developments.

Availability of Suitable Investments: While BAM believes that there are currently available many attractive investments of the type in which the Clients currently invest, there can be no assurance that such investments will continue to be available for the Clients' investment activities, or that available investments will meet the Clients' investment criteria.

Custody Risk: The Clients, prime brokers and their affiliates, and other primary custodians may, subject to the restrictions imposed by the Advisers Act, appoint sub-custodians in certain non-U.S. jurisdictions to hold the assets of the Client. The Clients' primary custodians may not be responsible for cash or assets held by sub-custodians in certain non-U.S. jurisdictions, or for any losses suffered by the Client as a result of the misconduct, bankruptcy or insolvency of any such sub-custodian.

Margin Risk: Clients who choose to borrow funds from the Broker-Dealer will receive the Margin Risk Disclosure Statement at the time they open their margin account. A Margin account involves higher risk due to the risk of leveraging. Some risks include, but are not limited to the following:

- You can lose more funds than You deposit into your Margin Account
- You are fully liable for the funds that You have borrowed
- The Broker-Dealer can force the sale of Securities and Other Property in Your Account without contacting you
- The Broker-Dealer can increase "house" maintenance margin requirements at any time without advance written notice
- You are not entitled to an extension of time to meet a margin maintenance call
- Short sales can result in unlimited liability.
- Interest rates on margin debit balance may vary.

THE LIST OF RISK FACTORS ABOVE IS NOT INTENDED TO BE A COMPLETE LIST OR EXPLANATION OF ALL OF THE RISKS INVOLVED IN BAM'S METHODS OF ANALYSIS AND INVESTMENT STRATEGIES USED IN FORMULATING INVESTMENT ADVICE OR MANAGING ASSETS.

Item 9 – Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Referencing the SEC offer of settlement submitted by Banorte Asset Management, Inc., dated August 22, 2023, and subsequent SEC acceptance of (the "Offer"), dated September 11th. This matter involves failures by Banorte, a Registered Investment Adviser, to comply with amendments to Advisers Act Rule 206(4)-1 that the Commission adopted in December 2020 (the "Amended Marketing Rule"). After November 4, 2022, the compliance deadline for the Amended Marketing Rule (the "Relevant Period"), Banorte advertised hypothetical performance on its public website without adopting and implementing policies and procedures reasonably designed to ensure that the hypothetical performance was relevant to the likely financial situation and investment objectives of the intended audience. As a result, Banorte violated Section 206(4) of the Advisers Act and Rule 206(4)-1(d)(6) thereunder. THE MATTER IS NOW CLOSED AND WAS SETTLED ON 9/14/2023. BANORTE ASSET MANAGEMENT, INC. HAS ADOPTED REVISED POLICIES AND PROCEDURES RELATED TO MARKETING AND REMOVED HYPOTHETICAL PERFORMANCE ADVERTISING FROM THE FIRM'S WEBSITE.

Item 10 – Other Financial Industry Activities and Affiliations

In addition to BAM being a Registered Investment Adviser, our affiliate, Banorte Securities International, Ltd. (“BSI”), is a FINRA registered broker-dealer. A list of affiliated broker-dealers is specifically disclosed in Section 7.A. on Schedule D of Form ADV, Part 1, which can be accessed by following the directions provided on the Cover Page of this Firm Brochure. Additionally, IARs of BAM are also licensed to sell securities as Registered Representatives of BSI and are also licensed insurance agents with third party insurance companies. These individuals spend the majority of their professional time offering securities and insurance products through such affiliations. As a result of such sales activity, such individuals receive normal and customary compensation in the form of commissions and/or other compensation.

This affiliate relationship and the dual registration of IARs creates inherent conflicts. These conflicts are reviewed by internal management and compliance personnel to determine BAM’s appropriate course of action. Those conflicts that cannot be mitigated Investment Advisory Services offered by Investment Adviser Representatives through BAM will be addressed through internal controls, including, but not limited to, upfront review processes, monitoring of transactional activity, and other internal controls. Conflicts will be disclosed to customers through a variety of disclosure documents, provided prior to or at the time an account is recommended. These disclosures include, for example, Form CRS and this brochure. IARs of BAM are dually registered as registered representatives with BSI. This may create a conflict where IARs may seek to maximize their compensation by mixing customer business between advisory accounts and brokerage products. As a result of this conflict, registered representatives/IARs may split investments between advisory accounts and brokerage accounts to earn higher compensation.

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

BAM has adopted a Code of Ethics which is distributed to all associated persons of BAM. The Code of Ethics generally prohibits any associated persons from acting in a manner that places their own interests or the interests of BAM ahead of a customer. This includes restrictions against associated persons using information about BAM's practices or recommendations for customer accounts for their own benefit; or taking advantage of investment opportunities that would otherwise be available for the Firm's Customers. Also, as a matter of business policy, the Firm wants to avoid even the appearance that the Firm, its employees or others receive any improper benefit from information about customer trading or accounts or from our relationships with our customers or with the brokerage community. BAM will provide a copy of its Code of Ethics to any customer or prospective customer upon request.

The Firm believes that any conflict of interest that may be present would be very limited, BAM has implemented a personal trading policy that requires all associated persons to disclose any personal securities transactions in Reportable Securities to the firm, at least quarterly. In addition, all associated persons must report all personal trading accounts of the associated person or his/her immediate family members living in the same household that hold, or can hold, Securities, and holdings in all Reportable Securities, initially within 10 days of becoming an associated person and each year thereafter.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to Compliance@banortesecurities.com, or by calling us at 713-980-4600.

BAM and individuals associated with the Firm are prohibited from engaging in principal transactions.

BAM and individuals associated with the Firm are prohibited from engaging in agency cross transactions.

Item 12 – Brokerage Practices

BAM does not have any soft-dollar arrangements and does not receive any soft-dollar benefits.

BAM uses its affiliate, BSI, to execute all trade recommendations for customers. BSI in turn has a transaction clearing and custody agreement with Pershing LLC division of Bank of New York, whereby BAM customer assets are custodied at Pershing LLC and trades executed through this entity. The business relationship with Pershing LLC provides BSI and BAM economic benefit that BAM would not receive if BAM did not use BSI and Pershing LLC for trade execution, clearing, settlement and/or custody. A customer may be able to reduce such costs by using an Adviser other than BAM. The customer should understand that BAM has an inherent conflict of interest by using BSI for trade execution since the charges levied by BSI in some instances may be greater than those of other broker-dealers. The conflicts of interest exist because the use of BSI conflicts with the customer's desire to effect all transactions at the lowest possible cost.

Should the client wish to direct brokerage transactions to a different outside broker or dealer, it would have to provide instructions and obtain approval from BAM.

Item 13 – Review of Accounts

REVIEWS:

While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed on a trade date basis by reviewing applicable order tickets and again on a quarterly basis by reviewing customer account statements. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

These accounts are reviewed by a BAM member of the Products and Strategy department under the supervision of the Chief Investment Officer and a member of the office of Compliance.

REPORTS:

The Custodian sends periodic statements to the Client showing all disbursements for the Account, including the amount of the Adviser's fee. These statements are sent on a monthly basis when there has been activity in or disbursements from the Account; otherwise they are sent on a quarterly basis.

Item 14 – Client Referrals and Other Compensation

BAM has a general firm policy of not compensating unaffiliated third parties for referring potential clients to BAM for advisory services. However, BAM has a referral arrangement with its affiliated bank, Banco Mercantil del Norte (“Banco Mercantil”). As part of the arrangement, BAM periodically provides “non-cash” compensation to individual representatives of Banco Mercantil in the form of sales awards, trips, or other prizes. BAM believes its affiliation with Banco Mercantil is readily apparent to potential advisory client referrals, and such non-cash compensation provided to Banco Mercantil representatives is typically in small amounts.

Item 15 – Custody

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that the Firm directs the broker-dealer to directly debit advisory fees from client accounts. As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. The Custodian sends periodic statements to the Client showing all disbursements for the Account, including the amount of the Adviser's fee. These statements are sent on a monthly basis when there has been activity in or disbursements from the Account; otherwise, they are sent on a quarterly basis

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

The Firm is deemed to have custody of client assets because it has the ability to have fees and other expenses deducted directly from a client's account, thus must meet the requirements listed under Rule 206(4)-2 of the Investment Advisers Act, however, the Firm is exempt from the surprise examination requirements of the Independent Verification.

Item 16 – Investment Discretion

“BAM Traditional” offers both discretionary and non-discretionary investment advisory services.

Under our Discretionary investment advisory services, the Adviser is authorized, without prior consultation with the Client, to buy, sell, trade and allocate in and all or a portion of the Assets among various UCIT ETFs and open ended funds, corporate debt securities, U.S. government securities, ETNs, alternatives and structured notes in accordance with the Client’s designated investment objective(s), as set forth on Schedule B or as otherwise provided in writing by Client to Adviser, as the same may be amended from time to time. Unless the Client has advised the Adviser to the contrary, in writing, there are no restrictions that the Client has imposed upon the Adviser with respect to the management of the Assets. The Adviser will be responsible for recommending an appropriate asset allocation for the Assets; evaluating and selecting securities within each asset class; implementing the investment strategy through trading and rebalancing; and monitoring Asset performance and drift to make changes as necessary.

Under our Non-Discretionary investment advisory services, the Adviser will be responsible for recommending an appropriate asset allocation for the Assets; investing or disposing of or holding securities in the Account with the Client’s consent; keeping the Client’s Assets under review in order to ensure that the Client’s Assets remain invested in a manner that is consistent with the Client’s chosen investment objectives; and monitoring performance of the Client’s Assets. The Adviser cannot effect any transaction in the Account without first obtaining prior verbal consent from the Client for any such transaction

Item 17 – Voting Client Securities

BAM shall have no obligation or authority to take any action or render any advice with respect to the voting of proxies solicited by or with respect to issuers of securities held in the Accounts. The client expressly retains the authority and responsibility for, and BAM is expressly precluded from rendering any advice or taking any action with respect to, the voting of any such proxies.

Item 18 – Financial Information

BAM has no additional financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

BAM has not been the subject of a bankruptcy petition at any time during the past ten years.