Item 1 – Cover Page

LBMC Investment Advisors, LLC

Registered Investment Advisor

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Brentwood, Tennessee 37027

(615) 377-4603

www.lbmcinvestmentadvisors.com

December 31, 2024

This Brochure provides information about the qualifications and business practices of LBMC INVESTMENT ADVISORS, LLC [LBMCIA]. If you have any questions about the contents of this Brochure, please contact us at (615) 377-4603 and/or LBMCInvestmentAdvisors@lbmc.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.

LBMC INVESTMENT ADVISORS, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about LBMC INVESTMENT ADVISORS, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

This Brochure is dated December 31, 2024

This Item will provide a summary of material changes made to this Brochure since the date of the last annual update on December 31, 2023

Pursuant to SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year which is December 31. We will further provide other ongoing disclosure information about material changes as necessary.

We will provide you with a new Brochure as necessary free of charge.

Items Containing Minor Material Changes:

Item 14 – Client Referrals and Other Compensation has been updated to reflect the addition of four Promoters: Chery Panther, Scott Womack, Melissa Cothran and Jonathan Cooke, employees of LBMC, PC, an affiliate of LBMCIA.

John A. Litchfield's position has been updated to Chairman and President of LBMCFS, an owner of LBMCIA,

David Morgan has retired as an officer of LBMCFS. His position has been updated to Board Member and Secretary of LBMCIA.

Currently, our Brochure may be requested by contacting our Chief Compliance Officer at (615) 377-4603 or LBMCInvestmentAdvisors@lbmc.com. Our Brochure is also available on our web site www.lbmcinvestmentadvisors.com , free of charge.

Additional information about LBMC INVESTMENT ADVISORS, LLC is available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site provides information about any persons affiliated with LBMCIA who are registered as investment adviser representatives of LBMCIA.

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Item 4 – Advisory Business

LBMC Investment Advisors, LLC (LBMCIA) was established in 1998 by the principals of the regional accounting firm LBMC, PC to provide investment advisory services. The principal owner of LBMCIA is LBMC Financial Services, LLC.

Portfolio Management

LBMCIA has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, LBMCIA will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when LBMCIA determines that changes to a client's portfolio are neither necessary nor prudent. Clients nonetheless remain subject to the fees described in Item 5 below during periods of account inactivity.

Typically, LBMCIA allocates the client's assets among a portfolio of index funds, mutual funds, bonds, or other appropriate investments.

LBMCIA manages accounts on a discretionary basis, which means that clients grant LBMCIA the authority to determine which securities and the amount of those securities to be bought or sold. This authority is specifically granted to LBMCIA by the client in the Advisory Agreement. Any limitations on this discretionary authority, including limitations on the types of investments which may be purchased on the client's behalf, must be stated in the Advisory Agreement, or must be accepted by LBMCIA in writing. Clients may also change or amend these limitations by giving written notice to LBMCIA. Changes become effective after they are accepted by LBMCIA.

Retirement Rollovers-Potential for Conflict of Interest

A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"}, or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If LBMCIA recommends that a client roll over their retirement plan assets into an account to be managed by LBMCIA, such a recommendation creates a conflict of interest if LBMC will earn new (or increase its current) compensation because of the rollover.

When acting in such capacity, LBMCIA serves as a fiduciary under the Employee Retirement Income Security Act (ERISA), or the Internal Revenue Code, or both. As such, prior to the rollover of assets from an employer plan, LBMCIA will obtain information about the existing employee benefit plan to the extent possible in order to be reasonably certain that the rollover is in the client's best interest.

No client is under any obligation to roll over retirement plan assets to an account managed by LBMCIA. LBMCIA's Chief Compliance Officer remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by a rollover transaction.

Use of Mutual and Exchange Traded Funds

Most mutual funds and exchange traded funds are available directly to the public. Therefore, a prospective client can obtain many of the funds that may be utilized by LBMCIA independent of engaging LBMCIA as an investment advisor. However, if a prospective client determines to do so, he/she will not receive LBMCIA's initial and ongoing investment advisory services.
In addition to LBMCIA's investment advisory fee described below, and transaction and/or custodial fees discussed below, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g., management fees and other fund expenses).

Cash Positions

As discussed further in Item 5, LBMCIA continues to treat cash as an asset class. As such, unless determined to the contrary by LBMCIA, all cash positions (money markets, etc.) shall continue to be included as part of assets under management for purposes of calculating LBMCIA's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), LBMCIA may maintain cash positions for defensive purposes. In addition, while assets are maintained in cash, such amounts could miss market advances. Depending upon current yields, at any point in time, LBMCIA's advisory fee could exceed the interest paid by the client's money market fund.

Client Obligations

In performing its services, LBMCIA shall not be required to verify any information received from the client or from the client's other professionals and is expressly authorized to rely thereon. Moreover, each client is advised that it remains their responsibility to promptly notify LBMCIA if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising LBMCIA's previous recommendations and/or services.

Cybersecurity Risk

The information technology systems and networks that LBMCIA and its third-party service providers use to provide services to LBMCIA's clients employ various controls, which are designed to prevent cybersecurity incidents stemming from intentional or unintentional actions that could cause significant interruptions in LBMCIA's operations and result in the unauthorized acquisition or use of clients' confidential or non-public personal information. Clients and LBMCIA are nonetheless subject to the risk of cybersecurity incidents that could ultimately cause them to incur losses, including for example: financial losses, cost and reputational damage to respond to regulatory obligations, other costs associated with corrective measures, and loss from damage or interruption to systems. Although LBMCIA has established its systems to reduce the risk of cybersecurity incidents from coming to fruition, there is no guarantee that these efforts will always be successful, especially considering that LBMCIA does not directly control the cybersecurity measures and policies employed by third-party service providers. Clients could incur similar adverse consequences resulting from cybersecurity incidents that more directly affect issuers of securities in which those clients invest, broker-dealers, qualified custodians, governmental and other regulatory authorities, exchange and other financial market operators, or other financial institutions.

For California residents only-*All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding our firm, our representatives, and any employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.*

Disclosure Brochure

A copy of LBMCIA's written Brochure and Client Relationship Summary, as set forth on Part 2 of Form ADV and Form CRS respectively, shall be provided to each client prior to the execution of any advisory agreement.

Regulatory Assets Under Management

As of December 31, 2024 LBMCIA managed client assets of approximately $1,953,855,930 on a discretionary basis. The Firm does not currently manage any non-discretionary assets.

Item 5 – Fees and Compensation

Portfolio Management

Annual fees charged for portfolio management services generally range from 0.4% to 1.00% of assets under management. Fees are negotiable under certain circumstances, including, but not limited to, accounts opened for employees (including affiliated company employees) or family members. If a client opens multiple accounts, the advisory fees are calculated based on the aggregated total of assets in the various accounts under management. Fees are calculated based on the market value, typically obtained from qualified custodians or other creditable sources, of the assets held in the client's account at the end of each calendar quarter. **CASH BALANCES POLICY** It is the Firm's policy that cash and cash equivalents (i.e., money market accounts) are an asset class. Absent approved mitigating circumstances and/or deviations, it is the Firm's policy to include cash balances as part of assets under management for fee billing purposes. Exceptions or modifications shall be approved by the President. Reasons for exceptions include, but are not limited to:

- Segregation of cash needed for short-term purposes (i.e., house purchase, medical expenses, college tuition, etc.);
- Competition;
- Negotiations with the client; and,
- Hardship

The Firm, at its discretion, may suspend and/or modify its policy to bill on cash balances during any specific billing quarter, including in the event that such billing would result in the client receiving a negative yield.

ANY QUESTIONS: The Firm's Chief Compliance Officer remains available to address them.

Management fees are prorated for each significant ($25,000 or more individually or aggregated) capital contribution and/or withdrawal made during the applicable calendar quarter. LBMCIA's standard fee schedule for portfolio management services is as follows:

For assets under management:

Account Market Value	Annualized Rate	Quarterly rate
On the first $2 Million($0-2MM)	1.00%	0.25%
On the next $2 Million($2-4MM)	0.75%	0.1875%
On the next $2 Million($4-6MM)	0.65%	0.1625%
On the next $4 Million($6-10MM)	0.60%	0.15%
On all amounts thereafter (over $10MM)	0.50%	0.125%

There is a minimum quarterly fee of $500. LBMCIA has the option to waive any portion of the minimum quarterly fee.

Clients typically grant LBMCIA the authority to deduct fees directly from the client's account. Fees are due quarterly in arrears based on the value of the account on the last day of the quarter with adjustments for significant contributions or withdrawals ($25,000 or more) and for accounts with margin balances greater or equal to $25,000 at the date fees are calculated. Both LBMCIA's Agreement and the custodial/clearing agreement may authorize the custodian to debit the account for the amount of LBMCIA's investment advisory fee and to directly remit that advisory fee to LBMCIA in compliance with regulatory procedures. In the limited event that LBMCIA bills the client directly, payment is due upon receipt of LBMCIA's invoice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. Fees for terminated accounts are calculated in a similar way to quarterly billing but are prorated to the date of termination.

Margin Accounts: Risks/Conflict of Interest. LBMC **does not** recommend the use of margin for investment purposes. A *margin account* is a brokerage *account* that allows investors to borrow money to buy securities. The broker/custodian charges the investor interest for the right to borrow money and uses the securities as collateral. By using borrowed funds, the customer is employing leverage that will magnify both account gains and losses. Should a client determine to use margin, LBMCIA will include the entire market value of the margined assets when computing its advisory fee. Accordingly, LBMCIA's fee shall be based upon a higher margined account value, resulting in LBMCIA earning a correspondingly higher advisory fee. As a result, the potential of conflict of interest arises since LBMCIA may have an economic disincentive to recommend that the client terminate the use of margin. **Please Note**: The use of margin can cause significant adverse financial consequences in the event of a market correction. **Our Financial Advisors remain available to address any questions that a client or prospective client may have regarding the use of margin.**

General Information on Fees

All fees paid to LBMCIA for investment advisory services are separate and distinct from, and in addition to, fees and expenses charged by mutual funds, independent advisers of separate accounts, or other investment products that are used in client accounts. These fees and expenses are described in each fund's prospectus or other disclosure documents. LBMCIA's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients will incur certain charges imposed by custodians, brokers, and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, trade away fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees which are disclosed in the fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to LBMCIA's fee, and LBMCIA shall not receive any portion of these commissions, fees, and costs. LBMCIA and its supervised persons do not receive compensation for the sale of securities or other products.

A client could invest directly in the types of securities listed in the Portfolio Management section above without the services of LBMCIA. In that case, the client would not receive the services provided by LBMCIA which are designed, among other things, to assist the client in determining which investment securities are appropriate for each client's financial condition and objectives. Accordingly, the client should review the fees charged by the funds, other service providers and LBMCIA. The client should fully understand the total amount of fees to be paid and evaluate the advisory services being provided.

For California residents only-*Subsection (j) of Rule 260.238, California Code of Regulations requires that all investment advisers disclose to their advisory clients that similar services may be available from other registered investment advisers for lower fees.*

Clients are expected to enter into a written Advisory Agreement with LBMCIA prior to the provision of services by the firm. LBMCIA does not represent, warrant, or imply that the services or methods of analysis used can or will predict future results, successfully identify market trends, identify high performing independent money managers, or insulate clients from losses due to market declines. The agreement may be cancelled at any time, for any reason, by the client upon written notice or by LBMCIA upon 60 days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. LBMCIA's fees are not charged on the basis of a share of capital appreciation of the funds or any portion thereof.

LBMCIA may recommend alternative investment vehicles, such as hedge funds, to qualifying clients based upon the client's risk tolerance, net worth, financial objectives, investment expertise, and how the investment fits within the client's asset allocation strategy. With respect to such investments, LBMCIA will monitor the investment's performance and provide periodic reports to the client.

Item 12 further describes the factors that LBMCIA considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

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

LBMCIA does not charge 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

LBMCIA provides portfolio management services to individuals, high net worth individuals, corporate entities, and foundations.

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

<u>Methods of Analysis</u>

LBMCIA might use Morningstar Advisor, investment risk questionnaires, asset allocation models, and Monte Carlo Simulations to conduct an "Investment Check-Up" as part of its process to identify an appropriate investment strategy for clients and to provide the following services:

CURRENT PORTFOLIO ANALYSIS: Assist the client in understanding how their current investment portfolio is allocated and how investments have performed. Additionally, it is used to determine areas that might be over or under-weighted in the current allocation and to approximate the costs of the investments.

OBJECTIVE SETTING: Assist the client in defining appropriate investment objectives and desired investment returns based upon the client's financial situation and tolerance for risk.

ASSET ALLOCATION: Assist the client in allocating their assets among different investment types -- to implement this approach, LBMCIA may use mutual funds, exchange traded funds (EFTs), money managers, individual securities such as bonds and stocks, hedge funds and / or other investment vehicles that are deemed appropriate -- in a manner most likely to achieve the client's objective.

LBMCIA's investment strategy is based on the science of investing built upon decades of academic research and institutional application. Our portfolios are designed to accomplish one single task – to capture the market's return while minimizing risk through prudent diversification. Our philosophy is firmly grounded in Modern Portfolio Theory (MPT).

MPT guides us in the construction of our portfolios. One of the most important and influential economic theories ever postulated (it won the Nobel Prize in 1992), MPT provides the framework for creating optimal portfolios by closely considering the relationship between risk and reward. MPT proves that by mixing assets of varying correlation in a portfolio, the portfolio's risk can actually be lower than the sum of its individual parts.

Market timing -- the attempt to determine the best time to buy or sell an investment -- and security selection add very little, if any, return to a portfolio. We do not follow the latest investment fads, chase performance or engage in emotion-based trading in our clients' portfolios. All of these activities will reduce the probability of delivering the risk-adjusted returns that are there for investors who stay the course.

We direct our attention to factors that have a high probability of creating a successful investment strategy:

1.) Diversification- using different Asset Classes (i.e. Equity and Fixed Income) and different classifications within them. Equity classes would include large capitalization companies, small capitalization companies, international companies, emerging markets, real estate, and others. Fixed income could be composed of long-term, short-term, taxable and tax-free classes.

2.) Minimizing fees and transaction costs when possible
3.) Focus on our clients' after-tax returns when possible.

Finally, we closely monitor the portfolio to ensure the structural integrity of the investments is never compromised.

By embracing proven academic theories and building an investment strategy focused on factors that can be controlled, we can create portfolios that have a much greater likelihood of success for our clients than the typical trading-intensive, performance chasing approach.

Investment Risk

Investing in securities involves risk of loss that clients should be prepared to bear.

All investments present the risk of loss of principal- which means that the investments could be worth less when sold than the price paid for the securities. There is also the risk of losing purchasing power which means the rate of appreciation of the investment was less than the rate of inflation.

The investments used by LBMCIA for clients include domestic large and small companies, international and emerging market equities, real estate investment trusts, government and corporate bonds, bank certificates of deposit, commodities, hedge funds, and any other investments we reasonably believe will enable the client to reach their investment objectives.

Each of these investments has unique risk characteristics which must be considered before investing. These risks include loss of value, loss of purchasing power, and the ability to convert the investment quickly to cash.

More information about the risks of any specific investment should be discussed with your LBMCIA advisor before investing.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all facts regarding any legal or disciplinary events that would be material to your evaluation of LBMCIA or the integrity of LBMCIA's management. Public information about the Firm's history may be found by accessing the SEC's public disclosure site at www.adviserinfo.sec.gov.

Item 10 – Other Financial Industry Activities and Affiliations

LBMCIA is affiliated with LBMC, PC (LBMCPC) an accounting firm.

Individuals associated with LBMCPC occasionally recommend LBMCIA to clients of LBMCPC in need of investment advisory services.

LBMCIA may also recommend LBMCPC to advisory clients for accounting services. Accounting services provided by LBMCPC are separate and distinct from LBMCIA advisory services. LBMCPC will charge for those services separately under an agreement with the client. LBMCIA nor its employees receive any compensation for referrals to LBMCPC.

Clients are under no obligation to use LBMCPC for any services.

Item 11 – Code of Ethics

The Code of Ethics is designed to assure that the personal securities transactions, activities, and interests of the employees of LBMCIA will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions.

A. Under the Code, certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of LBMCIA's clients. In addition, the Code requires pre-clearance of certain transactions and restricts trading in close time proximity to client trading activity.

B. LBMCIA maintains an investment policy relative to personal securities transactions. This investment policy is part of LBMCIA's overall Code of Ethics, which serves to establish a standard of business conduct for all of LBMCIA's Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request. In accordance with Section 204A of the Investment Advisers Act of 1940, LBMCIA also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by LBMCIA or any person associated with LBMCIA.

C. Neither LBMCIA nor any related person of LBMCIA recommends, buys, or sells for client accounts, securities in which LBMCIA or any related person of LBMCIA has a material financial interest.

D. LBMCIA and/or representatives of LBMCIA may buy or sell securities that are also recommended to clients. This practice may create a situation where LBMCIA and/or representatives of LBMCIA are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest.

LBMCIA has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of LBMCIA's "Access Persons". LBMCIA's securities transaction policy requires that an Access Person of LBMCIA must provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date LBMCIA selects.

E. LBMCIA and/or representatives of LBMCIA may buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where LBMCIA and/or representatives of LBMCIA are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. As indicated above in Item 11.C, LBMCIA has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of LBMCIA's Access Persons.

LBMCIA's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Tracey Hill at Tracey.Hill@lbmc.com or (615) 377-4603.

Item 12 – Brokerage Practices

The Custodians and Brokers We Use

LBMCIA does not maintain custody of your assets that we manage, although we are deemed to have custody of your assets if you give us authority to withdraw assets from your account (see *Item 15 – Custody*, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We recommend that our clients use either Charles Schwab & Co., Inc. (Schwab), or Fidelity Institutional Wealth Services (Fidelity) as the qualified custodian. Both are registered broker-dealers and members of SIPC. LBMCIA is independently owned and operated and is not affiliated with Schwab or Fidelity. Schwab or Fidelity will hold your assets in a brokerage account and buy and sell securities when we instruct them to.

While we recommend that you use Schwab or Fidelity as your custodian/broker, you will decide whether to do so and will open your account by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. If your account is maintained at Schwab or Fidelity, we can still use other brokers to execute trades for your account as described below (see "*Your Brokerage and Custody Costs*"). A client who directs LBMCIA to use a broker other than Schwab or Fidelity should be aware that they may not receive any of the advantages that LBMCIA derives from its arrangements with Schwab or Fidelity.

How We Select Brokers/Custodians

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are, overall, more advantageous when compared to other available providers. We consider a wide range of factors, including, among others:
• Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
• Capability to execute, clear, and settle trades (buy and sell securities for your account)
• Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, etc.)
• Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
• Availability of investment research and tools that assist us in making investment decisions
• Quality of services
• Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
• Reputation, financial strength, security, and stability
• Prior service to us and our clients
• Availability of other products and services that benefit us, as discussed below (see "*Products and Services Available to Us"*)

Your Brokerage and Custody Costs

For our clients' accounts that Schwab or Fidelity maintain, they generally do not charge you separately for custody services but are compensated by charging you commissions or other fees on trades that they execute or settle into your account. Certain trades (for example, many mutual funds and ETFs) may not incur commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program. For some accounts, Schwab may charge you a percentage of the dollar amount of assets in the account in lieu of commissions (asset-based fees). Schwab's commission rates and asset-based fees applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a total of at least $10 million of their assets in accounts at Schwab. This commitment benefits you because the overall commission rates and asset-based fees you pay are lower than they would be otherwise.

In addition to commissions and asset-based fees, Schwab and Fidelity charge you a flat dollar amount as a "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into either your Schwab or Fidelity account. This occurs most often when buying bonds for a client account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. We have determined that having Schwab or Fidelity execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "*How We Select Brokers/Custodians*").

Products and Services Available to Us

Schwab and Fidelity are in business to serve independent investment advisory firms like us. They provide us and our clients with access to their institutional brokerage services—trading, custody, reporting, and related services—many of which are not typically available to their retail customers. They also make available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. These support services generally are available on an unsolicited basis (we don't have to request them) and at no charge to us. The following is a more detailed description of available support services.

Services That Benefit You

Schwab and Fidelity institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through them include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. The services described in this paragraph generally benefit you and your account.

Services That May Not Directly Benefit You

Schwab and Fidelity also make available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research from them and that of third parties. We may use this research to service all or a substantial number of our clients' accounts. In addition to investment research, Schwab and Fidelity also make available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services That Generally Benefit Only Us

Schwab and Fidelity also offer other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Schwab and Fidelity may provide some of these services themselves. In other cases, they may arrange for third-party vendors to provide the services to us. They may also discount or waive their fees for some of these services or pay all or a part of a third party's fees. Schwab and Fidelity may provide us with other benefits, such as occasional business entertainment of our personnel.

When appropriate, LBMCIA makes use of the benefits described in the previous three sections.

<u>Our Interest in Schwab and Fidelity Services</u>

The availability of these services from Schwab and Fidelity benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services so long as our clients collectively keep a total of at least $10 million of their assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The $10 million minimum may give us an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our recommendation of Schwab or Fidelity as custodian and broker is in the best interests of our clients. Our recommendation is primarily supported by the scope, quality, and price of their services (see "*How We Select Brokers/Custodians*") and not the services that benefit only us.

LBMCIA will use trade aggregation when multiple orders for a security are made and implementation is consistent with our obligation for best execution.

LBMCIA does not participate in any formal soft-dollar programs with any broker-dealers, but we do receive soft dollar benefits as a part of using those broker-dealers. These benefits have been described above.

Item 13 – Review of Accounts

Investment accounts are reviewed at least annually by a committee composed of the President, other LBMCIA Advisors and other associated persons of LBMCIA that provide investment advisory, portfolio management or client services. Each clients' accounts are reviewed in aggregate for appropriate allocation to desired investment categories and compared to the investment strategy statement for adjustment. As part of this process, the Investment Strategy Statement is reviewed to determine its continued appropriateness. More frequent reviews could be triggered by material economic or market events, or by a change in the client's financial circumstances. The number of accounts (client relationships) reviewed by the committee during each monthly scheduled meeting is about one-twelfth of the total LBMCIA client relationships.

LBMCIA provides performance reports to portfolio management clients at least quarterly. These are in addition to the custodial/brokerage statements and transaction confirmations received by the clients directly from the account custodians.

Item 14 – Client Referrals and Other Compensation

We receive an economic benefit from Schwab and Fidelity in the form of support products and services they make available to us and other independent investment advisors whose clients maintain their accounts with them. These products and services, how they benefit us, and the related conflicts of interest are described above (see *Item 12 – Brokerage Practices*). The availability of Schwab's and Fidelity's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

LBMCIA compensates outside promoters, associated persons, and or affiliated persons, including David K. Morgan; a board member and Secretary of LBMCIA, John A. Litchfield; Chairman and President of LBMCFS; an owner of LBMCIA, Sidney Pilson, Cheryl Panther, Scott Womack, Melissa Cothran, and Jonathan Cooke, employees of LBMCPC, an accounting firm affiliated with LBMCIA, for referring advisory clients to LBMCIA. Each client referred to LBMCIA by a third party will receive a written promoter's disclosure statement that details the terms of the compensation sharing arrangement. Clients obtained through promoters, associated or affiliated persons do not pay higher fees either initially or, on an annual basis, than those charged to clients obtained directly by LBMCIA.

Fidelity Investments Wealth Advisors Solutions® Program

LBMCIA no longer receives referrals for new clients under this program. However, for existing clients referred before 3/31/2021, LBMCIA still participates in the Fidelity Wealth Advisor Solutions® Program (the "WAS Program"), through which LBMCIA received referrals from Fidelity Personal and Workplace Advisors, LLC (FPWA), a registered investment adviser and Fidelity Investments company. LBMCIA is independent and not affiliated with FPWA or any Fidelity Investments company. FPWA does not supervise or control LBMCIA, and FPWA has no responsibility or oversight for LBMCIA's provision of investment management or other advisory services.

Under the WAS Program, FPWA acted as a promoter for LBMCIA, and LBMCIA pays referral fees to FPWA for each referral received based on LBMCIA's assets under management attributable to each client referred by FPWA or members of each client's household. The WAS Program is designed to help investors find an independent investment advisor, and any referral from FPWA to LBMCIA does not constitute a recommendation or endorsement by FPWA of LBMCIA's particular investment management services or strategies. More specifically, LBMCIA pays the following amounts to FPWA for referrals:

the sum of (i) an annual percentage of 0.10% of any and all assets in client accounts where such assets are identified as "fixed income" assets by FPWA and,

(ii) an annual percentage of 0.25% of all other assets held in client accounts.

In addition, LBMCIA agreed in the past to pay FPWA a minimum annual fee amount in connection with its participation in the WAS Program. These referral fees were paid by LBMCIA and not the client.

To receive referrals from the WAS Program, LBMCIA had to meet certain minimum participation criteria, but LBMCIA may have been selected for participation in the WAS Program as a result of its other business relationships with FPWA and its affiliates, including Fidelity Brokerage Services, LLC ("FBS"). As a result of its participation in the WAS Program, LBMCIA may have a potential conflict of interest with respect to its decision to use certain affiliates of FPWA, including FBS, for execution, custody and clearing for certain client accounts, and LBMCIA may have a potential incentive to suggest the use of FBS and its affiliates to its advisory clients, whether or not those clients were referred to LBMCIA as part of the WAS Program. Under an agreement with FPWA, LBMCIA agreed that they will not charge clients more than the standard range of advisory fees disclosed in its Form ADV 2A Brochure to cover promoter fees paid to FPWA as part of the WAS Program. Pursuant to these arrangements, LBMCIA has agreed not to solicit clients to transfer their brokerage accounts from affiliates of FPWA or establish brokerage accounts at other custodians for referred clients other than when LBMCIA's fiduciary duties would so require, and LBMCIA has agreed to pay FPWA a one-time fee equal to 0.75% of the assets in a client account that is transferred from FPWA's affiliates to another custodian; therefore, LBMCIA may have an incentive to suggest that referred clients and their household members maintain custody of their accounts with affiliates of FPWA. However, participation in the WAS Program does not limit LBMCIA's duty to select brokers on the basis of best execution.

Schwab Advisor Network

LBMCIA receives client referrals from Charles Schwab & Co., Inc. ("Schwab") through LBMCIA's participation in Schwab Advisor Network® ("the Service"). The Service is designed to help investors find an independent investment advisor. Schwab is a broker-dealer independent of and unaffiliated with LBMCIA. Schwab does not supervise LBMCIA and has no responsibility for LBMCIA's management of clients' portfolios or LBMCIA's other advice or services. LBMCIA pays Schwab fees to receive client referrals through the Service. LBMCIA's participation in the Service may raise potential conflicts of interest described below.

LBMCIA pays Schwab a Participation Fee on all referred clients' accounts that are maintained in custody at Schwab and a Non-Schwab Custody Fee on all accounts that are maintained at, or transferred to, another custodian. The Participation Fee paid by LBMCIA is a percentage of the value of the assets in the client's account, subject to a minimum Participation Fee. LBMCIA pays Schwab the Participation Fee for so long as the referred client's account remains in custody at Schwab. The Participation Fee is billed to LBMCIA quarterly and may be increased, decreased or waived by Schwab from time to time. The Participation Fee is paid by LBMCIA and not by the client. LBMCIA has agreed not to charge clients referred through the Service fees or costs greater than the fees or costs LBMCIA charges clients with similar portfolios who were not referred through the Service.

LBMCIA generally pays Schwab a Non-Schwab Custody Fee if custody of a referred client's account is not maintained by, or assets in the account are transferred from Schwab. This Fee does not apply if the client was solely responsible for the decision not to maintain custody at Schwab. The Non-Schwab Custody Fee is a one-time payment equal to a percentage of the assets placed with a custodian other than Schwab. The Non-Schwab Custody Fee is higher than the Participation Fees Advisor generally would pay in a single year. Thus, LBMCIA will have an incentive to recommend that client accounts be held in custody at Schwab.

The Participation and Non-Schwab Custody Fees will be based on assets in accounts of LBMCIA's clients who were referred by Schwab and those referred clients' family members living in the same household. Thus, LBMCIA will have incentives to encourage household members of clients referred through the Service to maintain custody of their accounts and execute transactions at Schwab and to instruct Schwab to debit LBMCIA's fees directly from the accounts.

For accounts of LBMCIA's clients maintained in custody at Schwab, Schwab will not charge the client separately for custody but will receive compensation from LBMCIA's clients in the form of commissions or other transaction-related compensation on securities trades executed through Schwab. Schwab also will receive a fee (generally lower than the applicable commission on trades it executes) for clearance and settlement of trades executed through broker-dealers other than Schwab. Schwab's fees for trades executed at other broker-dealers are in addition to the other broker-dealer's fees. Thus, LBMCIA may have an incentive to cause trades to be executed through Schwab rather than another broker-dealer. LBMCIA nevertheless, acknowledges its duty to seek best execution of trades for client accounts. Trades for client accounts held in custody at Schwab may be executed through a different broker-dealer than trades for LBMCIA's other clients. Thus, trades for accounts maintained at Schwab may be executed at different times and different prices than trades for other accounts that are executed at other broker-dealers.

Item 15 – Custody

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct the account custodian (Schwab or Fidelity) to deduct our advisory fees directly from your account or if you grant us authority to move your money or investments to another person's account. The custodian maintains actual custody of your assets. You will receive account statements directly from Schwab or Fidelity at least quarterly. They will be sent to the email or postal mailing address you provided to them. You should carefully review those statements promptly when you receive them. LBMCIA urges you to compare those account statements to the periodic portfolio reports you will receive from us. Our statements might vary slightly from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

If you grant an LBMCIA employee or any individual considered by the Securities and Exchange Commission(SEC) to be a supervised person of LBMCIA access to your investment accounts or other financial accounts (i.e. bank accounts not managed by LBMCIA), LBMCIA is considered to have custody of your account with the ability to transfer your assets without your express knowledge, This includes any transfers to a third party as directed by a standing letter of authorization . All the accounts that are considered to be in custody require an annual surprise examination by an independent Certified Public Accountant at a date of their choosing and who will submit their report findings directly to the Securities and Exchange Commission. Accounts that are considered to be in custody because LBMCIA can deduct fees directly from the account or the accounts where disbursements to a third-party meet the seven conditions the SEC requires to qualify for the "no-action" relief from examination, are not subject to an annual surprise examination.

Item 16 – Investment Discretion

LBMCIA usually 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. 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, LBMCIA observes the investment strategy statement, limitations, and restrictions of the clients.

Limitations and restrictions must be provided to LBMCIA in writing.

Item 17 – Voting Client Securities

LBMCIA does not vote proxies of securities held in clients' accounts. Any proxy solicitations received by LBMCIA will be forwarded to the client so that they may vote them according to their own best interest.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about LBMCIA's financial condition. LBMCIA 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.