Form ADV Part 2A – Disclosure Brochure

February 22, 2019

This Form ADV 2A ("Disclosure Brochure") provides information about the qualifications and business practices of B.E.S.T. Wealth Management LLC ("B.E.S.T." or the "Adviser"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (314) 801-1324 or by email at info@bestwealth.net.

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

Additional information about B.E.S.T. and its Advisory Persons is available on the SEC's website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 160920.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A* and *Part 2B*.

Part 2A (the "Disclosure Brochure") provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. *Part 2B* (the "Brochure Supplement") provides information about advisory personnel of B.E.S.T.

B.E.S.T. believes that communication and transparency are the foundation of its relationship and continually strive to provide its Clients with complete and accurate information at all times. B.E.S.T. encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions they may have with us. And of course, we always welcome your feedback.

Material Changes

B.E.S.T. has one material change to report since our last annual update on March 11, 2018. We now offer Tax Preparation Services; please see Items 4 and 5 for additional details.

Future Changes

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

At any time, Clients may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 160920. Clients may also request a copy of this Disclosure Brochure at any time, by contacting us at (314) 801-1324 or by email at info@bestwealth.net.

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Item 4 – Advisory Services

A. Firm Information

B.E.S.T. Wealth Management LLC ("B.E.S.T." or "Advisor") is a registered investment adviser located in the State of Missouri and organized as a Limited Liability Company ("LLC") under the laws of Missouri. B.E.S.T. was founded in February 2009 and became a registered investment adviser in February 2012. B.E.S.T. is owned and operated by Brad E.S. Tinnon (Principal). This Disclosure Brochure provides information regarding the qualifications of, business practices of, and advisory services provided by B.E.S.T.

The Advisor serves as a fiduciary to Clients, as defined under applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness, and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

B. Advisory Services Offered

B.E.S.T. offers investment advisory services to individuals, businesses, and retirement plans in Missouri and other states (each referred to as a "Client").
Our investment philosophy is grounded entirely in academic, historical, and Nobel Prize winning research, not Wall Street predictions. The following 6 fundamental principles are at the heart of what we do:

(1) Markets are Efficient.
(2) Certain Investments Have Higher Expected Returns.
(3) Diversification is Essential.
(4) Investing Involves Balancing Risk and Return.
(5) Emotional Decisions Should Be Avoided.
(6) The Media are Not Financial Experts.

<u>Investment Advisory Services</u>

B.E.S.T.'s investment advisory services include creating tailor-made written financial plans and providing customized ongoing investment management services. B.E.S.T. believes a written financial plan is the backbone for all Clients' financial well-being. So much so, that B.E.S.T. has a satisfaction guarantee that states that a Client does not have to pay the firm any fees unless and until the Client is satisfied with his or her written financial plan. Once satisfied with the written financial plan, B.E.S.T. will then begin managing the Client's account(s) according to the written financial plan and will also begin charging its management fee.

B.E.S.T.'s process starts by focusing on the Client's goals, time horizon, and risk tolerance. Through a series of personal interviews and the use of questionnaires we will collect pertinent data and identify goals, objectives, financial problems, and potential solutions. With this information, we tailor the Client's financial plan and our advice. The Client will receive a written financial plan following the completion of our meetings. B.E.S.T will continue to provide customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. B.E.S.T. will construct an investment portfolio, consisting of low-cost exchange-traded funds ("ETFs") or mutual funds to achieve the Client's investment goals. B.E.S.T. may also utilize other types of securities, as necessary and consistent with our philosophy, to meet the needs of a particular Client.

B.E.S.T.'s investment strategy is long-term focused, but we may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. B.E.S.T. will construct, implement, and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in his or her respective portfolio, subject to our acceptance. B.E.S.T. evaluates and selects ETFs and mutual funds for inclusion in Client portfolios only after applying our internal due diligence process. B.E.S.T. may recommend, on occasion, redistributing investment allocations to diversify the portfolio. B.E.S.T. may recommend specific positions to increase sector or asset class weightings. B.E.S.T. may recommend employing cash positions as a possible hedge against market movement. B.E.S.T. may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the positions in

the portfolio, change in risk tolerance of the Client, generating cash to meet the Client's needs, or any risk deemed unacceptable for the Client's risk tolerance.

At no time will B.E.S.T. accept or maintain custody of a Client's funds or securities, except for the authorized deduction of our fees. All Client assets will be managed within their designated account or accounts at the Custodian, pursuant to the Client investment advisory agreement. Please see Item 15 – Custody and Item 12 – Brokerage Practices for additional information.

Seminars

B.E.S.T. offers seminars and workshops to educate Clients on investment topics. The seminars are educational in nature and no specific investment or tax advice is given. B.E.S.T. may also offer financial literacy workshops to businesses and on behalf of businesses to their employees or clients.

Retirement Plan Advisory Services

B.E.S.T. provides the following retirement plan advisory services:

- Plan Fiduciary Services
- Communication and Education

Plan Fiduciary Services - B.E.S.T. serves as a 3(21) Fiduciary in support of the Plan Sponsor. B.E.S.T. provides the following Plan Fiduciary Services pursuant to the terms of the Advisor's agreement with each Plan Sponsor:

- Plan Design
- Vendor Analysis
- Employee Enrollment and Education
- Investment Policy Statement Preparation
- Investment Selection and Monitoring
- Performance Reporting
- Ongoing Investment Recommendations and Assistance
- ERISA 404(c) Assistance
- Fee Benchmarking Services
- Fiduciary Checklist Preparation

B.E.S.T. may also provide 3(38) discretionary investment advisory services on behalf of the Plan and Plan Sponsor. In such instances, B.E.S.T shall have the discretion to select the investments for the Plan and to make investment decisions on behalf of Plan Participants.

Communication and Education - B.E.S.T. provides Communication and Education to the Plan and its Participants, pursuant to the terms of our agreement with each Plan Sponsor:

- Direct employee contact by phone, e-mail or letter upon eligibility to promote enrollment
- Investment education
- Annual on-site advisor visits with staff for account updates and reviews
- Periodic employee group education opportunities

Tax Preparation Services

B.E.S.T. offers Tax Preparation services to individuals, families, and sole proprietorships based on the following three levels of complexity:

- Low Complexity – W-2 wages, retirement income, retirement investments (IRAs, 401ks, etc.) and a small number of non-IRA investments.
- Medium Complexity – Multiple non-IRA investments, is self-employed, has multi-state employment, has a small number of rental real estate properties, or has trust/partnership income.
- High Complexity – Similar to Medium Complexity, but to a larger degree (i.e. large number of rental real estate properties, multiple businesses, or multiple sources of trust or partnership income).

C. Client Account Management

Prior to engaging B.E.S.T. to provide investment advisory services, each Client is required to enter into one or more advisory agreements with B.E.S.T. that define the terms, conditions, authority and responsibilities of B.E.S.T. and the Client. These services may include:

- Establishing an Investment Strategy – B.E.S.T., in connection with the Client, will develop an investment strategy that seeks to achieve the Client's investment goals and objectives.
- Asset Allocation – B.E.S.T. will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation, and tolerance of risk for each Client.
- Portfolio Construction – B.E.S.T. will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – B.E.S.T. will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

B.E.S.T. does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by B.E.S.T.

E. Assets Under Management

As of December 31, 2018, B.E.S.T. manages the following assets:

Discretionary Assets	$ 19,791,173
Non-Discretionary Assets	67,441
Total Assets Under Management	**$19,858,614**

Clients may request more current information at any time by contacting B.E.S.T.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by B.E.S.T. Each Client shall sign one or more advisory agreements that detail the responsibilities of B.E.S.T. and the Client.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are calculated monthly, in arrears, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management during the month, prorating for contributions and withdrawals during the month. Fees range from 1.45% to 0.55% based on the following schedule:

Total Investment Assets	Annual Rate
Up to $250,000	1.45%
$250,001 to $500,000	1.35%
$500,001 to $1,000,000	1.25%
$1,000,001 to $2,000,000	1.00%
$2,000,001 to $4,000,000	0.90%
$4,000,001 to $6,000,000	0.80%
$6,000,001 to $8,000,000	0.75%
$8,000,001 to $10,000,000	0.70%
$10,000,001 to $12,000,000	0.65%
$12,000,001 to $14,000,000	0.60%
Above $14,000,000	0.55%

Total Investment Assets typically exclude the value of assets in the Client's 401(k) or 403(b) plan. The investment advisory fee in the first month of service is prorated to the inception date of the account to the end of the first month. Fees may be negotiable at the sole discretion of B.E.S.T. The Client's fees will take into consideration the aggregate assets under management with B.E.S.T. All securities held in accounts managed by B.E.S.T. will be independently valued by the Custodian. B.E.S.T. does not have the authority or responsibility to value portfolio securities.

Financial Planning and Consulting Services

For our annual planning engagements, financial planning fees are included in the investment advisory service fees, which are billed monthly, in arrears. For hourly engagements, we charge a fee of $250 per hour for consulting services.

Seminars

B.E.S.T. offers seminars for a fixed engagement fee ranging from $500 to $5,000. The fee varies based on the topic and length of the seminar. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with B.E.S.T.

Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 1.00%. Fees are calculated quarterly, in arrears, and may be negotiable depending on the size and complexity of the Plan. Certain existing Clients may have fee schedules that differ from the schedule below. Fees are generally based on the following schedule:

Assets Under Management	Annual Rate
Up to $1,000,000	1.00%
$1,000,001 to $2,000,000	0.75%
$2,000,001 to $4,000,000	0.65%
$4,000,001 to $6,000,000	0.55%
$6,000,001 $8,000,000	0.45%
$8,000,001 to $10,000,000	0.40%
$10,000,001 to $14,000,000	0.35%
$14,000,001 and Up	0.30%

B.E.S.T.'s fee is exclusive of and in addition to brokerage fees, transaction fees, and other related costs and expenses that may be incurred by the Client. However, we will not receive any portion of these commissions, fees, or costs.

B. Fee Billing

Investment Management Services

Investment advisory fees will be calculated by B.E.S.T. or its delegate and deducted from the Client's account at the Custodian. B.E.S.T. or its delegate shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account at the respective month-end date. The amount due is calculated by applying the monthly rate (annual rate divided by 12) to the total assets under management with B.E.S.T. during the month (prorating for contributions and withdrawals during the month). Each Client will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. In addition, B.E.S.T. will provide the Client with a report itemizing the fee, including the calculation period covered by the fee, the account value, and the methodology used to calculate the fee. It is the Client's responsibility to verify the accuracy of these fees as listed on the Custodian's brokerage statement because the Custodian does not assume this responsibility. Clients provide written authorization permitting B.E.S.T. to be paid directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Financial Planning and Consulting Services

For annual planning engagements, financial planning fees are billed monthly in arrears. For hourly engagements, financial planning and consulting fees are invoiced by B.E.S.T. upon completion of the engagement deliverables and are due upon receipt.

Seminars
Seminar fees are due upon completion of the seminar.

Retirement Plan Advisory Services

Retirement Planning fees will be calculated and billed quarterly, in arrears. The fees are based on the market value of assets under management as of the last day of the quarter. Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

Tax Preparation Services
For our tax preparation services, we charge a fee based on the following levels of complexity:

Level of Complexity	Fee for Clients	Fee for Non-Clients
Low Complexity	$200	$250
Medium Complexity	$300	$350
High Complexity	$500	$550

Any return that is more complex than a *High complexity Return* will be billed an additional $75 per hour.

B.E.S.T. will invoice the Client at the completion of the tax preparation process.

C. Other Fees and Expenses

A Client may incur certain fees or charges imposed by third parties other than B.E.S.T. in connection with investment made on behalf of the Client's account. The Client is responsible for all custody and securities execution fees charged by the Custodian. The investment advisory fee charged by B.E.S.T. is separate and distinct from these custody and execution fees.

In addition, all fees paid to B.E.S.T. for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of B.E.S.T., but would not receive the services provided by B.E.S.T. which are designed, among other things, to assist the Client in determining which products or services are most appropriate for his or her financial situation and objectives. Accordingly, the Client should review both the fees charged by the funds and the fees charged by B.E.S.T. to fully understand the total fees to be paid. Please see Item 12 – Brokerage Practices.

D. Advance Payment of Fees and Termination

Investment Management Services and Retirement Plan Services

B.E.S.T. is compensated for its services at the end of the month, after investment advisory services are rendered. Retirement plan fees are billed quarterly in arrears. Either party may terminate the advisory agreement with B.E.S.T., at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the investment advisory agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and those fees will be due and payable by the Client. The Client's investment advisory agreement with B.E.S.T. is non-transferable without Client's prior consent.

Financial Planning and Consulting Services and Seminars

B.E.S.T. is compensated for its financial planning and consulting services and seminars in arrears. Either party may terminate a planning or consulting or seminar agreement, at any time, by providing written notice to the other party. The Client may also terminate the agreement within five business (5) days of signing the agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project times the agreed-upon hourly rate. The Client's agreement with B.E.S.T. is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

B.E.S.T. does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

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

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

B.E.S.T. does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

B.E.S.T. offers investment advisory services to individuals, businesses, and retirement plans in Missouri and other states. The amount of each type of Client is available on our Form ADV Part 1A. These amounts may change over time and are updated at least annually. B.E.S.T. generally does not impose a minimum size for establishing a relationship.

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

A. Methods of Analysis

B.E.S.T. primarily employs a passive allocation methodology. The Advisor may also utilize fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from B.E.S.T. is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases, and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria that indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps B.E.S.T. in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. B.E.S.T. monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on our review process are included in Item 13.

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

B. Risk of Loss

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

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk, and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the

analysis of his or her account. B.E.S.T. will rely on the financial and other information provided by the Client or his or her designee without the duty or obligation to validate the accuracy and completeness of the provided information. It is the Client's responsibility to inform us of any changes in financial condition or goals or any other factors that may affect this analysis. The risks associated with a particular strategy are provided to each Client in advance of investing his or her account. B.E.S.T. will work with each Client to determine his or her tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's strategy:

Market Risks
The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks
The performance of an ETF is subject to market risk, including the possible loss of principal. The value of the ETFs will fluctuate with the value of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low volume. Authorized participants in an ETF may change at any time; this may result in change to the liquidity and the ability to redeem the ETF as the authorized participants control the number of shares of the ETF. The value of an ETF fluctuates based upon the market movements and may disassociate from the index being tracked or from the value of the underlying investments. An ETF purchased or sold at one point in the day may have a different value than the same ETF purchased or sold a short time later.

Mutual Fund Risks
The performance of a mutual fund is subject to market risk, including the possible loss of principal. The value of the mutual fund will fluctuate with the value of the underlying securities that make up the fund. Because the value of a mutual fund is typically set daily, a mutual fund purchased at one point in the day will typically have the same value as a mutual fund purchased later that same day.

Real Estate Investment Trusts ("REITs")

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. Equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of his or her investment. These investments often have concentrated positions and investments that may carry higher risks. Clients should only have a portion of their assets in these investments.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with us.

Item 9 – Disciplinary Information

There are no legal, regulatory, or disciplinary events involving B.E.S.T. or any of its Supervised Persons. B.E.S.T. values the trust our Clients place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Clients can find our backgrounds on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 160920.

Item 10 – Other Financial Industry Activities and Affiliations

The sole business of B.E.S.T. is to provide investment advisory services to our Clients. Neither B.E.S.T. nor our Advisory Persons are involved in other business endeavors. B.E.S.T. does not maintain any affiliations with other firms, other than contracted service providers to assist with the servicing of our Clients' accounts.

Other Industry Affiliations

B.E.S.T. does not have any other industry affiliations.

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

A. Code of Ethics

B.E.S.T. has implemented a Code of Ethics (the "Code") that defines our fiduciary commitment to each Client. This Code applies to all persons associated with B.E.S.T. (our "Supervised Persons") The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. B.E.S.T. and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of B.E.S.T.'s Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that may address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (314) 801-1324 or via email at info@bestwealth.net.

B. Personal Trading with Material Interest

B.E.S.T. allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. B.E.S.T. does not act as principal in any transactions. In addition, B.E.S.T. does not act as the general partner of a fund or advise an investment company. B.E.S.T. does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

B.E.S.T. allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that we recommend (purchase or sell) to Clients presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted a Code, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of B.E.S.T. may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by B.E.S.T. requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

D. Personal Trading at Same Time as Client

While B.E.S.T. allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time, will B.E.S.T. or any Supervised Person of B.E.S.T. transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

B.E.S.T. does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize B.E.S.T. to direct trades to this Custodian as agreed in the investment advisory agreement.

Further, B.E.S.T. does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where B.E.S.T. does not exercise discretion over the selection of the Custodian, we may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a Custodian not recommended by the Advisor. B.E.S.T. may recommend the Custodian based on criteria including, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation, and the location of the Custodian's offices. B.E.S.T. typically recommends that Clients establish accounts at TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade"). TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer and member FINRA/SIPC. TD Ameritrade offers to independent investment advisers services, which include custody of securities, trade execution, clearance and settlement of transactions. B.E.S.T. receives some benefits from TD Ameritrade through its participation in the program. Please see the disclosure under Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an adviser enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. B.E.S.T. does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, B.E.S.T. receives certain benefits from TD Ameritrade, as detailed in Item 14 – Client Referrals and Other Compensation.

2. Brokerage Referrals - B.E.S.T. does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where B.E.S.T. will place trades within the established accounts at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s] at the Custodian, unless otherwise instructed in writing by the Client. B.E.S.T. will not engage in any principal transactions (i.e., trade of any security from or to B.E.S.T.'s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's accounts). B.E.S.T. is not obligated to select competitive bids on securities transactions or to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account factors such as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality, and 5) skill required of the Custodian. B.E.S.T. will execute its transactions through the Custodian as authorized by the Client. B.E.S.T. may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Mr. Tinnon, Principal of B.E.S.T. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account will be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may also be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, or large deposits or withdrawals in the Client's accounts. The Client is encouraged to notify B.E.S.T. if changes

occur in his or her personal financial situation that might adversely affect his or her investment plan. Additional reviews may be triggered by material market, economic, or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions, and fees relating to the Client's accounts. B.E.S.T. may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by B.E.S.T.

B.E.S.T. does not receive commissions or other compensation from product sponsors or broker dealers.

Participation in Institutional Advisor Platform

As disclosed under Item 12, above, B.E.S.T. participates in TD Ameritrade's institutional customer program and may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between B.E.S.T.'s participation in the program and the investment advice it gives to its Clients, although we receive economic benefits through our participation in the program that are typically not available to TD Ameritrade 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 B.E.S.T. 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 B.E.S.T. by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by our related persons. Some of the products and services made available by TD Ameritrade through the program may benefit B.E.S.T. but may not benefit our Client accounts. These products or services may assist us in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits received by B.E.S.T. or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of our fiduciary duties to Clients, B.E.S.T. endeavors at all times to put the interests of our Clients first. Clients should be aware, however, that the receipt of economic benefits by B.E.S.T. or our related persons in and of itself creates a potential conflict of interest and may indirectly influence our choice of TD Ameritrade for custody and brokerage services.

B. Client Referrals from Solicitors

B.E.S.T. does not engage paid solicitors for Client referrals.

Item 15 – Custody

B.E.S.T. does not accept or maintain custody of any Client accounts, except for the authorized deduction of our fees. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct B.E.S.T. to utilize the Custodian for the Client's security transactions. B.E.S.T. encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives B.E.S.T. the authority to move money from one account to another account, we may have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and B.E.S.T. have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

Item 16 – Investment Discretion

B.E.S.T. generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by B.E.S.T. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by B.E.S.T. will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

B.E.S.T. does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, but the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

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

Item 19 – Requirements for State Registered Advisors

A. Educational Background and Business Experience of Principal Officer

The Principal of B.E.S.T. is Brad E. Tinnon. Information regarding the formal education and background of Mr. Tinnon is included in his Form ADV Part 2B.

B. Other Business Activities of Principal Officer

Mr. Tinnon has no other business activities to report.

C. Performance Fee Calculations

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

D. Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding B.E.S.T. or Mr. Tinnon. Neither B.E.S.T. nor Mr. Tinnon has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against B.E.S.T. or Mr. Tinnon.

Securities laws require an adviser to disclose any instances where the adviser or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding B.E.S.T. or Mr. Tinnon.***

E. Material Relationships with Issuers of Securities

Neither B.E.S.T. nor Mr. Tinnon has any relationships or arrangements with issuers of securities.

Privacy Policy

Effective: February 12, 2019

Our Commitment to You
B.E.S.T. Wealth Management LLC ("B.E.S.T.") is committed to safeguarding the use of your personal information that we have as your Investment Adviser. B.E.S.T. (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does B.E.S.T. provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

The Information We Collect About You
You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

• Name and address	• Assets
• E-mail address	• Income
• Phone number	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

Information About You That B.E.S.T. Shares
B.E.S.T. works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy B.E.S.T.'s regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

To repeat, we do not sell your non-public personal information to anyone.

Information About Former Clients
B.E.S.T. does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

Confidentiality and Security
Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

We'll Keep You Informed
We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and we will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at (314) 801-1324 or via email at info@bestwealth.net.