

## Uniform Application for Investment Adviser Registration

Name of Investment Adviser:  
Lindner Capital Advisors, Inc.Address: (Number and Street) (City) (State) (Zip Code) Area Code Telephone Number  
**600 Village Trace Bldg. 23 St 300 Marietta GA 30067 (770 ) 977-7779**

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.  
The information has not been approved or verified by any governmental authority.**

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

**Potential persons who are to respond to the collection of information contained in this form  
are not required to respond unless the form displays a currently valid OMB control number.**

**1. A. Advisory Services and Fees.** (check the applicable boxes) For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

**Applicant:**

<input checked="" type="checkbox"/>	(1)	Provides investment supervisory services . . . . .	<u>99</u>	%
<input type="checkbox"/>	(2)	Manages investment advisory accounts not involving investment supervisory services . . . . .	_____	%
<input checked="" type="checkbox"/>	(3)	Furnishes investment advice through consultations not included in either service described above . . . . .	<u>1</u>	%
<input type="checkbox"/>	(4)	Issues periodicals about securities by subscription . . . . .	_____	%
<input type="checkbox"/>	(5)	Issues special reports about securities not included in any service described above . . . . .	_____	%
<input type="checkbox"/>	(6)	Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities . . . . .	_____	%
<input type="checkbox"/>	(7)	On more than an occasional basis, furnishes advice to clients on matters not involving securities . . . . .	_____	%
<input type="checkbox"/>	(8)	Provides a timing service . . . . .	_____	%
<input type="checkbox"/>	(9)	Furnishes advice about securities in any manner not described above . . . . .	_____	%

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

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**B.** Does applicant call any of the services it checked above financial planning or some similar term? . . . . .  Yes  No

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**C.** Applicant offers investment advisory services for: (check all that apply)

<input checked="" type="checkbox"/>	(1)	A percentage of assets under management	<input type="checkbox"/>	(4)	Subscription fees
<input checked="" type="checkbox"/>	(2)	Hourly charges	<input type="checkbox"/>	(5)	Commissions
<input checked="" type="checkbox"/>	(3)	Fixed fees (not including subscription fees)	<input type="checkbox"/>	(6)	Other

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**D.** For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

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**2. Types of Clients** — Applicant generally provides investment advice to: (check those that apply)

<input checked="" type="checkbox"/>	A.	Individuals	<input checked="" type="checkbox"/>	E.	Trusts, estates, or charitable organizations
<input type="checkbox"/>	B.	Banks or thrift institutions	<input checked="" type="checkbox"/>	F.	Corporations or business entities other than those listed above
<input type="checkbox"/>	C.	Investment companies	<input type="checkbox"/>	G.	Other (describe on Schedule F)
<input checked="" type="checkbox"/>	D.	Pension and profit sharing plans			

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> A. Equity securities                                       | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities                             |  |
| <input type="checkbox"/> (2) securities traded over-the-counter                                | <input type="checkbox"/> I. Options contracts on:                          |
| <input type="checkbox"/> (3) foreign issuers   | <input type="checkbox"/> (1) securities                                    |
|  | <input type="checkbox"/> (2) commodities                                   |
| <input type="checkbox"/> B. Warrants   |  |
| <input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input type="checkbox"/> J. Futures contracts on:                          |
| <input type="checkbox"/> D. Commercial paper   | <input type="checkbox"/> (1) tangibles                                     |
| <input type="checkbox"/> E. Certificates of deposit  | <input type="checkbox"/> (2) intangibles                                   |
| <input type="checkbox"/> F. Municipal securities   |  |
| <input type="checkbox"/> G. Investment company securities:                                     | <input type="checkbox"/> K. Interests in partnerships investing in:        |
| <input type="checkbox"/> (1) variable life insurance   | <input type="checkbox"/> (1) real estate                                   |
| <input checked="" type="checkbox"/> (2) variable annuities                                     | <input checked="" type="checkbox"/> (2) oil and gas interests              |
| <input checked="" type="checkbox"/> (3) mutual fund shares                                     | <input type="checkbox"/> (3) other (explain on Schedule F)                 |
|  | <input checked="" type="checkbox"/> L. Other (explain on Schedule F)       |

**4. Methods of Analysis, Sources of Information, and Investment Strategies.**

A. Applicant's security analysis methods include: (check those that apply)

- |   |   |
|---|---|
| (1) <input type="checkbox"/> Charting               | (4) <input type="checkbox"/> Cyclical                                 |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical   |   |

B. The main sources of information applicant uses include: (check those that apply)

- |   |   |
|---|---|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines    | (5) <input type="checkbox"/> Timing services  |
| (2) <input type="checkbox"/> Inspections of corporate activities              | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input type="checkbox"/> Company press releases   |
| (4) <input checked="" type="checkbox"/> Corporate rating services             | (8) <input checked="" type="checkbox"/> Other (explain on Schedule F)   |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- |   |  |
|---|--|
| (1) <input checked="" type="checkbox"/> Long term purchases (securities held at least a year) | (5) <input type="checkbox"/> Margin transactions   |
| (2) <input type="checkbox"/> Short term purchases (securities sold within a year)             | (6) <input type="checkbox"/> Option writing, including covered options, uncovered options, or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days)                         | (7) <input checked="" type="checkbox"/> Other (explain on Schedule F)  |
| (4) <input type="checkbox"/> Short sales  |  |

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**5. Education and Business Standards.**

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? ..... Yes No

(If yes, describe these standards on Schedule F.)

**6. Education and Business Background.**

- For:
- each member of the investment committee or group that determines general investment advice to be given to clients, or
  - if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
  - each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- year of birth
- formal education after high school
- business background for the preceding five years

**7. Other Business Activities.** (check those that apply)

- A. Applicant is actively engaged in a business other than giving investment advice.
- B. Applicant sells products or services other than investment advice to clients.
- C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

**8. Other Financial Industry Activities or Affiliations.** (check those that apply)

- A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
  - (1) broker-dealer
  - (2) investment company
  - (3) other investment adviser
  - (4) financial planning firm
  - (5) commodity pool operator, commodity trading adviser or futures commission merchant
  - (6) banking or thrift institution
  - (7) accounting firm
  - (8) law firm
  - (9) insurance company or agency
  - (10) pension consultant
  - (11) real estate broker or dealer
  - (12) entity that creates or packages limited partnerships

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? ..... Yes No

(If yes, describe on Schedule F the partnerships and what they invest in.)

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**9. Participation or Interest in Client Transactions.**

Applicant or a related person: (check those that apply)

- A. As principal, buys securities for itself from or sells securities it owns to any client.
- B. As broker or agent effects securities transactions for compensation for any client.
- C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account? Yes No
- 

(If yes, describe on Schedule F.)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

**INVESTMENT ADVISORY SERVICES:**

**Robert J. Lindner, President of Lindner Capital Advisors, Inc. ("LCA"), reviews account performance on a random basis for each client. Scott Wetherington, LCA's Chief Investment Strategist, reviews account performance several times each quarter. One review each quarter is for the purpose of rebalancing client accounts as well as ensuring the account is invested according to the client's objectives and the LCA investment policy. Individual solicitors are encouraged to review the accounts they are responsible for quarterly and at a minimum semi-annually.**

**FINANCIAL PLANNING SERVICES:**

**Should the client engage LCA to prepare a financial plan or a specific analysis, the client is under no obligation to engage LCA for reviews. Annual reviews will be conducted by the planner who presented the original plan, if requested. Planners are instructed to review plans to insure they conform to generally accepted standards in the planning community.**

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

**Quarterly reports are provided to each client which reflect the current quarterly performance, the prior quarters' performance, a rolling twelve month performance, performance since inception, annualized returns net of fees billed for the subsequent period, activity during the reporting period, investments owned at the end of the reporting period, current market value of all assets in the account, the account value on which the fee is based, and how the fee was calculated. The custodian will value securities in the account that are listed on a national securities exchange or NASDAQ at the closing price, on the valuation date, on the principal market where the securities are traded. Mutual funds will be valued at the closing net asset value on the valuation date. Securities which are not traded on an exchange will be valued in a manner determined in good faith by LCA to reflect fair value.**

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**12. Investment or Brokerage Discretion.**

- A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:
- |  |                                     |                                     |
|--|-------------------------------------|-------------------------------------|
| (1) securities to be bought or sold? .....               | Yes                                 | No                                  |
|  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| (2) amount of the securities to be bought or sold? ..... | Yes                                 | No                                  |
|  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| (3) broker or dealer to be used? .....                   | Yes                                 | No                                  |
|  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| (4) commission rates paid? .....                         | Yes                                 | No                                  |
|  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

- B. Does applicant or a related person suggest brokers to clients? ..... Yes No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

**13. Additional Compensation.**

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? ..... Yes No
- B. directly or indirectly compensates any person for client referrals? ..... Yes No

(For each yes, describe the arrangements on Schedule F.)

**14. Balance Sheet.** Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
  - requires prepayment of more than \$500 in fees per client and 6 or more months in advance
- Has applicant provided a Schedule G balance sheet? ..... Yes No

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Lindner Capital Advisors, Inc.</b>	IRS Empl. Ident. No.: <b>58-2286781</b>
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Item of Form (identify)	Answer
Part II, 1.D(1)	<p style="text-align: center;"><b><u>Investment Supervisory Services</u></b></p> <p>Lindner Capital Advisors, Inc., ("LCA"), provides continuous discretionary investment advisory and account supervisory services on a fee-only basis for individuals, businesses, qualified pension and profit sharing plans, individual retirement accounts, trusts and other entities. LCA also provides services to specific subaccounts of the Advisor's Edge Select variable annuity issued by Monumental Life Insurance Company.</p> <p>In designing investment plans for clients, LCA will rely on information supplied by the client, as well as the solicitor's representative, pertaining to the client's financial situation, objectives, time horizon and risk tolerance. This information becomes the basis for determining and constructing the asset allocation plan which LCA believes best meets the client's long term stated goals. LCA may use computer software packages from third parties in an attempt to better assist clients in achieving their goals.</p> <p>The investment plan will contain assets in classes which LCA believes (based on historical data) will have attractive combinations of return, risk and correlation. LCA has access to institutional-quality mutual funds which are not available to the retail investor except when purchased through an advisor. These funds are utilized in client portfolios. Modern Portfolio Theory techniques will be utilized in managing client accounts.</p> <p>For its advisory, design, selection, oversight and reporting services, LCA receives an annual fee based on a percentage of assets under management as shown below. An independent custodian, not LCA, values a client's account for fee billing. Fees are paid quarterly in advance, computed based on the value of the portfolio on the last business day of the calendar quarter. Fees for the initial billing period and additional deposits in excess of \$50,000 during the quarter will be prorated for the number of days management services were provided. Refunds for final billing periods and withdrawals in excess of \$50,000 during the quarter will be prorated for the number of days management services were not provided. Fees and refunds are calculated in the following manner: account balance x fee x number of days/360.</p>

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Lindner Capital Advisors, Inc.</b>	IRS Empl. Ident. No.: <b>58-2286781</b>
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Item of Form (identify)	Answer																														
	<p><b><u>LCA's Retained Portion of the Total Advisory Fee*</u></b></p>																														
	<p><b><u>Traditional or Global Portfolio Series:</u></b></p> <table style="width:100%; border: none;"> <tr> <td style="width:60%;"><u>Total AUM (\$)</u></td> <td style="width:40%; text-align: right;"><u>Annual Fee</u></td> </tr> <tr> <td>Up to 249,999</td> <td style="text-align: right;">60 basis points</td> </tr> <tr> <td>250,000 to 599,99</td> <td style="text-align: right;">55 basis points</td> </tr> <tr> <td>600,000 to 999,999</td> <td style="text-align: right;">50 basis points</td> </tr> <tr> <td>1,000,000 to 4,999,999</td> <td style="text-align: right;">45 basis points</td> </tr> <tr> <td>5,000,000 to 9,999,999</td> <td style="text-align: right;">40 basis points</td> </tr> <tr> <td>10,000,000 and over</td> <td style="text-align: right;">Negotiable</td> </tr> </table> <p><b><u>Contemporary Portfolio Series:</u></b></p> <table style="width:100%; border: none;"> <tr> <td style="width:60%;"><u>Total AUM (\$)</u></td> <td style="width:40%; text-align: right;"><u>Annual Fee</u></td> </tr> <tr> <td>500,000-999,999</td> <td style="text-align: right;">75 basis points</td> </tr> <tr> <td>1,000,000-4,999,999</td> <td style="text-align: right;">70 basis points</td> </tr> <tr> <td>5,000,000-7,499,999</td> <td style="text-align: right;">60 basis points</td> </tr> <tr> <td>7,500,000- 9,999,999</td> <td style="text-align: right;">55 basis points</td> </tr> <tr> <td>10,000,000 and over</td> <td style="text-align: right;">50 basis points</td> </tr> </table> <p><b><u>Defensive Portfolio Series:</u></b></p> <table style="width:100%; border: none;"> <tr> <td style="width:60%;"><u>Total AUM (\$)</u></td> <td style="width:40%; text-align: right;"><u>Annual Fee</u></td> </tr> <tr> <td>\$100,000 minimum</td> <td style="text-align: right;">40 basis points</td> </tr> </table> <p>* Clients who open accounts for less than \$100,000 will be charged a one time \$200 set up fee and an annual \$50 maintenance fee, the proceeds of which accrue solely to LCA.</p> <p>The schedule displayed above represents LCA's portion of the advisory fee. The total advisory fee charged is the sum of LCA's fee plus the Solicitor's portion as agreed upon and represented in the Solicitor's Agreement. This information is disclosed to the client in the Solicitor's Disclosure Statement and Fee Sharing Agreement as part of the Investment Management Agreement.</p>	<u>Total AUM (\$)</u>	<u>Annual Fee</u>	Up to 249,999	60 basis points	250,000 to 599,99	55 basis points	600,000 to 999,999	50 basis points	1,000,000 to 4,999,999	45 basis points	5,000,000 to 9,999,999	40 basis points	10,000,000 and over	Negotiable	<u>Total AUM (\$)</u>	<u>Annual Fee</u>	500,000-999,999	75 basis points	1,000,000-4,999,999	70 basis points	5,000,000-7,499,999	60 basis points	7,500,000- 9,999,999	55 basis points	10,000,000 and over	50 basis points	<u>Total AUM (\$)</u>	<u>Annual Fee</u>	\$100,000 minimum	40 basis points
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Lindner Capital Advisors, Inc.</b>	IRS Empl. Ident. No.: <b>58-2286781</b>
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Item of Form (identify)	Answer
	<p>The fee is discounted for the accounts of solicitors, employees and family members affiliated with LCA. At the sole discretion of management, fees may be negotiated. LCA may negotiate subadvisor agreements with some of its broker/dealers or registered investment advisors. Fees are debited directly from the client account and the clients are notified of the fee and the manner of computation at the time of the account charge. In some cases our agreements with broker/dealers allow the broker/dealers to debit the entire fee from the client account and forward LCA's portion of the fee directly to us. These agreements may also allow the broker/dealer to charge fees to the client that are higher, or lower, than the portion generally agreed upon in a standard Solicitor's agreement. Any additional fees charged by the broker/dealer are disclosed to the client at the time of the account opening by the broker/dealer or investment adviser.</p> <p>If a client terminates an advisory contract within five (5) business days of signing, the client is entitled to a full refund. The Investment Management Agreement (IMA) will otherwise remain in force until terminated by either party. The client may terminate the agreement at any time by giving written notice to the Advisor. No penalty or termination fee will be charged. LCA may terminate the agreement at any time by giving written notice to the client. In all cases, the client will be responsible for all fees which may accrue through the termination date of the contract and LCA will return all accrued fees if applicable.</p> <p>While the client's assets will be held by a qualified custodian, LCA may be viewed as having custody of client assets under the Investment Advisers Act of 1940, due to LCA's authority to deduct advisory fees directly from a client's account. The qualified custodian and LCA will deliver account statements directly to clients on at least a quarterly basis.</p> <p style="text-align: center;"><b><u>Retirement Plan Investment Management Services</u></b></p> <p>LCA also offers comprehensive 401(k) services to plan sponsors through partnerships with NextStep, The Finway Group (dba The Architect 401K), The Online 401K, and 401K ASP and their respective custodians. These strategic business alliances allow LCA to offer a turnkey product to clients, which includes nondiscretionary investment management services in a sophisticated platform that allows the integration of investment, custodial, and administrative services.</p> <p>As the investment manager for the platform, LCA allows clients to choose from a group of five model portfolios designed by LCA containing no-load, advisory</p>

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Lindner Capital Advisors, Inc.</b>	IRS Empl. Ident. No.: <b>58-2286781</b>
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Item of Form (identify)	Answer												
	<p>class, or load-waived mutual funds. Clients have discretion as to which model portfolio they choose, as well as the frequency of portfolio rebalancing. Clients in turn may reject a rebalancing recommendation. Clients also have the option of creating a custom portfolio.</p> <p>Fees for investment management services are computed based on the total market value of assets in a client account as of the close of business on the last business day of each calendar quarter. Fees for new accounts are computed based on the total market value of assets initially deposited into the account. 401(k) accounts are charged an investment advisory fee either in advance or in arrears as specified in the Investment Management Agreement. Fees are either deducted from client accounts or paid by the client as indicated in the client agreement. Either party, without the payment of penalty, may terminate advisory agreements at any time. In the event of termination, the fee will be prorated and collected for the period served or refunded if in advance.</p> <p style="text-align: center;"><u>Lindner Capital Advisors Fee Schedule:</u></p> <table style="margin-left: auto; margin-right: auto;"> <tr> <td>\$0 to \$1.25 million</td> <td style="text-align: right;">.4%</td> </tr> <tr> <td>\$1.25m to \$6.25 million</td> <td style="text-align: right;">.35%</td> </tr> <tr> <td>\$6.25m to \$25 million</td> <td style="text-align: right;">.3%</td> </tr> <tr> <td>\$25m to \$250 million</td> <td style="text-align: right;">.25%</td> </tr> <tr> <td>\$250m to \$1 billion</td> <td style="text-align: right;">.2%</td> </tr> <tr> <td>\$1 billion and above</td> <td style="text-align: right;">.1%</td> </tr> </table> <p>LCA has the discretion to change any or all of its fee schedules. In individual cases, LCA has the option to negotiate fees that are lower than the standard fee shown or to waive fees. Comparable services for lower fees may be available from other sources.</p> <p>Fees paid to LCA for advisory services are in addition to any fees the client will pay to any mutual funds. Such fees, including advisory fees and 12b-1 fees, are described in the prospectuses for the underlying mutual funds.</p> <p style="text-align: center;"><b><u>Wrap Fee Program</u></b></p> <p>LCA also provides investment advisory services to Clients participating in so-called "wrap fee" programs sponsored by various broker-dealers, investment</p>	\$0 to \$1.25 million	.4%	\$1.25m to \$6.25 million	.35%	\$6.25m to \$25 million	.3%	\$25m to \$250 million	.25%	\$250m to \$1 billion	.2%	\$1 billion and above	.1%
\$0 to \$1.25 million	.4%												
\$1.25m to \$6.25 million	.35%												
\$6.25m to \$25 million	.3%												
\$25m to \$250 million	.25%												
\$250m to \$1 billion	.2%												
\$1 billion and above	.1%												

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Item of Form (identify)	Answer
	<p>advisers, consultants or other organizations ("Sponsors"). In these programs, the Sponsor generally provides a package of services, which may include any or all of the following: discretionary investment management, trade execution, account custody, performance monitoring and manager evaluation. The "wrap fee" may be all-inclusive or may cover only a portion of the services provided by the Sponsor and/or the discretionary adviser with other fees or expenses billed separately.</p> <p>Sponsors typically: (1) assist clients in defining their investment objectives based on information provided by the clients; (2) determine whether the given wrap fee arrangement is suitable for each client; (3) aid in the selection and monitoring of investment advisers (whether LCA or another adviser) who manage accounts (or a portion account assets), and (4) periodically contact clients to ascertain whether there have been any changes in the clients' financial circumstances or objectives that warrant changes in the arrangement or the manner in which the clients' assets are managed. Client information is generally channeled to LCA through the program Sponsor and LCA relies on the Sponsor to forward current and accurate Client information on a timely basis to assist in the day-to-day management of wrap accounts. Under certain programs, a Client may contact LCA directly concerning his or her account.</p> <p>Wrap fee programs come in many forms. In some, the client contracts only with the Sponsor and the discretionary manager enters into a sub-advisory contract with the Sponsor to provide discretionary investment advisory services to the Sponsor's clients. In these programs, LCA is paid by the Sponsor and receives a portion of the wrap fee collected by the Sponsor. In other programs, the Client has a contract with both the Sponsor and the discretionary adviser. In these programs, LCA generally uses its standard investment advisory agreement and Clients usually pay the standard LCA investment advisory fee schedule, although fees and account minimums may, under certain circumstances, be negotiable. In broker-dealer sponsored wrap programs, as reflected in the Client's contract with the Sponsor, the Client's account may be charged either as an asset-based fee or transaction-based fees (i.e.commissions).</p> <p>In evaluating wrap fee arrangements, a Client should consider a number of factors. Wrap fee arrangements may not themselves be suitable for any given Client. Suitability depends on a number of factors, including applicable wrap fee, account size, anticipated account trading activity, the Client's financial needs, circumstances and objectives, and the value of the various services provided. In some instances, these services may be obtained at a lower aggregate cost if</p>

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	<p>purchased separately. Although LCA is typically responsible for directing trades to brokers or dealers that it believes are capable of providing best price and execution, trades for asset-based wrap fee accounts which cover trades executed by a brokerdealer Sponsor or a broker-dealer affiliate of the Sponsor are generally executed by the Sponsor or its affiliate so that the Client is not charged commissions on the trades, as would be the case if the trades were directed to other broker-dealers for execution. Even where another broker-dealer quotes a more favorable price than that quoted by the Sponsor in a given trade, that lower price, along with the added commission, may on balance be less favorable to the Client than the Sponsor's higher quoted price. Sponsors providing execution services under a wrap fee are responsible for providing best price and execution for client trades.</p> <p>Also, for asset-based wrap fees which cover trades executed by a brokerdealer Sponsor, Clients may be charged both commissions on trades executed by other broker-dealers, and "mark-ups" and "mark-downs" on trades effected by the Sponsor or another dealer as principal, as well as odd-lot differentials, transfer taxes, handling charges, exchange fees, offering concessions and related fees for purchases of unit investment trusts, mutual funds and other public offerings of securities, and other charges imposed by law with regard to transactions in client accounts. Because the Sponsors receive no commission from trades effected on an agency basis, Sponsors may have an incentive to effect trades as principal in order to obtain "mark-ups" and "mark-downs." Asset-based fees may be considered by the Internal Revenue Service as an investment expense, rather than a transaction charge, which may result in less favorable tax treatment for certain investors. (Clients should consult with their professional tax advisors concerning the effect of this tax treatment on their individual circumstances.) Client accounts participating in broker-sponsored programs are generally broker-directed accounts. In broker-directed accounts, a client may direct that LCA use a particular broker-dealer, usually the broker sponsoring its particular program, to execute transactions for the client's account under such terms and arrangements as the client may negotiate with the particular brokerdealer. Please see Item 12, below, for further information regarding directed brokerage accounts.</p> <p>LCA offers its value-oriented discretionary investment advisory services under several wrap-style programs which are described in more detail below.</p> <p>Triad Advisors, Inc., Third Party Fee Based Accounts          Sponsor's Fee: asset based fee paid quarterly and in advance          Minimum Account Size: \$100,000</p>

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Part II, 1.A(3)	<p>LCA has a subadvisory agreement with Triad Advisors, Inc. Trade-PMR, Inc. Sponsor's Fee: asset based fee paid quarterly and in advance Minimum Account Size: \$100,000 LCA has a subadvisory agreement with Trade-PMR, Inc.</p> <p>Williams Financial Group, WFG Advisors, LP Sponsor's Fee: asset based fee paid quarterly and in advance Minimum Account Size: \$100,000 LCA has a subadvisory agreement with WFG Advisors, LP</p> <p align="center"><b><u>Annuity</u></b></p> <p>LCA provides asset allocation and administrative services for the Advisor's Edge Select Variable Annuity issued by Monumental Life Insurance Company.</p> <p>LCA asset allocation services include allocation and reallocation of assets pursuant to the LCA investment strategy for the annuity subaccounts. LCA also provides administrative services to the policy owners and registered representatives for the insurer. The services include ongoing service, support, training and education.</p> <p>Daily Mortality and Expense Risk Fee and Administrative Charges equal 1.45% annually. LCA's fee is encompassed within that fee and is .20% of the total assets of the variable annuity subaccounts for which LCA is providing services.</p> <p align="center"><b><u>Investment Advice Through Consultations</u></b></p> <p>Periodically, LCA is engaged to consult with a client on a specific investment or financial planning situation. Clients may choose to be billed hourly or by a negotiated flat rate. Fees may be reduced by sales charges, advisory fees or commissions at the discretion of the LCA.</p> <p align="center"><b><u>Hourly Consulting Fees</u></b></p> <table style="width:100%; border: none;"> <tr> <td style="width:70%;">Certified Financial Planner (principal)</td> <td style="text-align: right;">\$575.00</td> </tr> <tr> <td>Certified Financial Planner (non-principal)</td> <td style="text-align: right;">\$125.00</td> </tr> <tr> <td>Para-Planners</td> <td style="text-align: right;">\$65.00</td> </tr> </table>	Certified Financial Planner (principal)	\$575.00	Certified Financial Planner (non-principal)	\$125.00	Para-Planners	\$65.00
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	<p align="right"><b>Clerical Assistance \$30.00</b></p>
Part II., 3.L	<p>For hourly or ongoing consulting, fees will be billed and payable monthly. For negotiated flat rate arrangements, the fee is determined based on the complexity of the client's situation and is therefore negotiated prior to the signing of the contract. A 50% deposit of the estimated fee is due at the time of signing the contract with the remaining 50% due upon the client's receipt of the analysis and recommendations provided by LCA. The client has five (5) business days to rescind the contract during which time the client will be entitled to a full refund of fees paid. Contracts will be valid for one year from date of signing and a new contract must be signed on the anniversary date to continue advisor consultation.</p> <p>LCA has a referral agreement with Altegris Investments, Inc. in which LCA refers clients to Altegris for investment in certain private funds sold by Altegris as a BD selling agent. Altegris offers limited partnership interests in Commodity Trading Advisors (CTA) and other money managers in the alternative investments space. LCA has restricted its portfolios to include CTA's managing futures contracts to include both tangibles and intangibles.</p>
Part II., 4.A(5)	<p>LCA has the ability to analyze individual securities and recommend the purchase or sale of individual issues. From time to time, securities may be transferred into a client's account from another firm. In these cases, LCA relies upon information provided by the client and/or their investment advisor representative in determining whether to hold or sell such securities. LCA evaluates institutional mutual fund managers using due diligence criteria established by the Center for Fiduciary Studies at the Katz Graduate School, University of Pittsburgh. Managers are selected based upon their performance relative to their peer group, their performance relative to assumed risk, the inception date of the product, their correlation relative to their peer group, the assets they have under management, the consistency between their holdings and their investment style, the expense ratios or fees charged, and the stability of the organization.</p>
Part II, 4.(A)8	<p>Various computer software programs, as well as internet resources, are used by LCA to generate hypothetical portfolios based on asset class correlations. The analysis of mutual funds and index funds on a risk-adjusted basis is also available with the use of these programs.</p>
Part II, 4.C(7)	<p>Asset class investments will be made using institutional mutual funds. In selecting these assets, the Advisor will give due consideration to past</p>

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Part II, 5.	<p>performance, transaction fees, expense ratios, consistency, and management style. LCA constructs asset allocation plans ranging from aggressive to conservative, designed to meet the varying needs of the investor. The client and/or along with the Relationship Manager, selects the portfolio best suited to his or her individual needs, after the client has defined his or her objectives, risk tolerance, expected return and time horizons. Investments are considered to be long term in nature and investors should expect to remain fully invested in their selected asset allocation plan at all times. The Advisor, when it has discretion, strategically rebalances these portfolios on a periodic basis. Where LCA has discretion of client assets, LCA may use a global portfolio (fund of funds) in situations where an account does not meet the account minimum required: rebalancing of this global portfolio is determined by the portfolio manager of the global portfolio.</p> <p>Generally, LCA requires those who provide investment advice to have a college degree or equivalent business experience, the sufficiency of which is evaluated by LCA on an individual basis. It is the policy of LCA to encourage associated persons and corporate employees to pass the Investment Adviser Law Examination (Series 65); unless exempt by SEC standards. Employees also participate in continuing education programs offered by the firm.</p>
Part II, 6.	<p>Robert J. Lindner (YOB: 1951)          President/CEO, CCO, LCA          BA in Business Management, Mercer University          Masters Degree in Financial Planning, American College          Licensed Insurance Agent          Accredited Investment Fiduciary (AIF)          Chartered Life Underwriter (CLU)          Chartered Financial Consultant (ChFC)          Certified Financial Planner (CFP)          National Commodity Futures License (SRS 3)*          Registered Options Principal (SRS 4)*          General Securities Representative (SRS 7)*          General Securities Principal (SRS 24)*          Broker/Dealer Financial &amp; Operations Principal (SRS 28)*          Municipal Securities Principal (SRS 53)*          Securities Agent State Law Examination (SRS 63)*          Investment Adviser Law Examination (SRS 65)          *Mr. Lindner is currently registered with the broker-dealer, Resource Horizons Group, LLC, and his FINRA licenses are active.</p>

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	<p>Mr. Lindner is on the Board of Directors for both the Atlanta Humane Society and the Atlanta Chapter of the March of Dimes.</p> <p>Mr. Lindner has been President of The Lindner Group since 1983 and LCA since 1996.</p> <p>Scott Wetherington (YOB: 1966)            Chief Investment Strategist            BBA Finance, James Madison University            CFA Level III Candidate            Mr. Wetherington joined LCA in January 2009</p> <p>Paul C. Lorentzen, (YOB: 1961)            Chief Financial Officer, LCA            Masters Degree in Taxation            Certified Public Accountant (CPA)            Certified Financial Planner (CFP)            Investment Company Products/Variable Contracts Representative (SRS 6)*            General Securities Representative (SRS 7)*            General Securities Principal (SRS 24)*            Financial and Operations Principal (SRS 27)*            Securities Agent State Law Examination (SRS 63)*            Investment Advisor Law Examination (SRS 65)            Mr. Lorentzen is currently affiliated and registered with the FINRA firm, Resource Horizons Group, LLC.            Mr. Lorentzen has consulted with LCA since 2007 and has been a self-employed Certified Public Accountant since 1992.</p> <p>Linda Patricia Rose (YOB: 1951)            Secretary/Treasurer, LCA            Certified Para Planner from the College of Financial Planning            General Securities Representative (SRS 7)*            General Securities Principal (SRS 24)*            Investment Advisor Law Examination (SRS 65)            Ms. Rose is currently registered with the broker-dealer, Resource Horizons Group, LLC and her FINRA licenses are active.            Ms. Rose has been affiliated with LCA since 1996.</p>

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Part II, 10.	<p>From time to time, Robert Lindner may offer personally held shares of LCA to accredited investors that may or may not be clients of LCA. However, such related persons' purchase or sale of these securities or investment products is only for their own accounts and is done through their own broker-dealer. These purchases and sales may be different than what is being executed for clients' accounts. Any person to which Mr. Lindner makes this offer is provided with the appropriate disclosure document to be signed by the potential investor as purchaser and Mr. Lindner as the seller. The disclosure informs the potential investor that Mr. Lindner is not acting as an investment adviser or fiduciary in the proposed offer and that Mr. Lindner is acting in a personal capacity. The fact that there is no independent value for LCA stock is also disclosed in the potential offer.</p> <p>LCA has adopted a Code of Ethics and other ethical rules and guidelines for avoiding prohibited acts and managing and/or eliminating potential conflicts of interest. The ethics rules forbid any employee or officer of LCA from trading, either personally or on behalf of others, on material non-public information or communicating material non-public information to others in violation of the law. The ethics rules set forth restrictions on receipt of gifts, outside employment, maintenance of brokerage accounts, and other matters. Although LCA believes that its ethics rules are appropriate to manage or eliminate potential conflicts of interest between itself, its related persons and their clients, clients should be aware that no set of rules can possibly anticipate or relieve all potential conflicts. LCA will provide orientation on ethics rules to new employees and continuing educational sessions for all employees. A copy of the LCA Code of Ethics is available upon request.</p> <p>Investment supervisory services are offered for accounts with a minimum market value of \$50,000.00. LCA reserves the right to combine multiple accounts to determine if the minimum investment requirements are met, as well as to waive the minimum at its own discretion.</p>
Part II, 12.A	<p>LCA does not select which broker dealers clients' trades are placed for execution. However, LCA works with only a selected group of custodians/broker dealers from which its clients can choose. Based on the clients selection, all trades for their accounts are then placed through their selected custodian/broker dealer. The clients receive bundled services from their custodians/broker dealers that price all custodial, client service and trade costs into charges for trades placed. LCA periodically reviews these charges versus other options that clients could have and believes clients are achieving overall best execution.</p>

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Part II, 12.B	<p>LCA participates in the institutional service programs offered by Charles Schwab, Fidelity Investments, and TD Ameritrade ("custodians"), all of which are independent and unaffiliated FINRA member registered broker-dealers. Subadvisors also use National Financial Services (NFS) as a custodian. These firms offer services to independent registered investment advisors which include custody of securities, trade execution, and clearance and settlement of transactions. Custodians are chosen by LCA based upon their financial stability, advisor support services, and ability to electronically interface with the investment managers selected by LCA, the client, and our portfolio management software. Although these firms may offer additional benefits to advisors through participation in their programs, LCA does not obtain research from them nor are trades directed to them in return for soft dollars.</p> <p>The independent custodians make available to LCA other products and services that benefit LCA but may not benefit its client's accounts. Some of these other products and services assist LCA in managing and administering client's accounts. These include software and technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment so LCA's fees from its client's accounts, and assist with back-office functions, recordkeeping and clients reporting. Many of these services generally may be used to service all or a substantial number of LCA's account. The custodians also make available to LCA other services intended to help LCA manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, the custodians may make available, arrange and/or pay for these services rendered to LCA by third parties. The custodians may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to LCA. While as a fiduciary, LCA endeavors to act in its clients' best interests, LCA's recommendation that clients maintain their assets in accounts at various custodians may be based in part on the benefit to LCA or the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the custodian, which may create a potential conflict of interest.</p>

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Part II, 13.B	<p style="text-align: center;"><b><u>Solicitors</u></b></p> <p>LCA has entered into agreements with registered investment advisors, independent broker-dealers, and insurance providers to solicit clients that are searching for an investment advisor. For clients who retain LCA for investment advisory services, LCA agrees to compensate the Solicitor. The amount of compensation is disclosed on the Solicitors Disclosure Statement provided to the client when the account is opened.</p> <p>LCA directly compensates solicitors and indirectly compensates solicitor's representatives on a fee-sharing basis. The terms of such arrangement are disclosed to prospective clients by means of a solicitor's disclosure document provided at the time of solicitation. There is generally no fee differential charged to the client due to this compensation structure with the solicitor, however there will be a fee differential for the client with certain of our subadvisor agreements. All fees are fully disclosed to the client.</p> <p>LCA from time to time directly or indirectly compensates its Relationship Managers for client referrals.</p> <p style="text-align: center;"><b><u>Proxy Voting</u></b></p> <p>All client securities are held at the respective custodian: Fidelity Investments, Charles Schwab, National Financial Services, or TD Ameritrade. These custodians are responsible for ensuring all proxy material is forwarded to the client. LCA does not serve as custodian for any client securities, and as such does not receive proxies for securities held in client accounts. LCA does not vote, nor give advice on how to vote, proxies for securities held in client accounts.</p> <p style="text-align: center;"><b><u>Privacy Notice</u></b></p> <p>LCA's privacy policy provides that we may share personal customer information with our service providers in order to properly service customer's investment accounts. LCA considers client information to be personal and confidential and does not share any nonpublic personal information about clients with unaffiliated third parties, except as permitted or required by law.</p>

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	<p>LCA is committed to protecting the confidentiality and security of your private investment records and personal information. Our policies and procedures are designed to safeguard your information and to permit only appropriate and authorized access to and use of this information.</p> <p>In order to carry out the functions necessary to service your investment account, we collect certain nonpublic personal information from you from the following sources:</p> <ul style="list-style-type: none"> <li>• Information we receive from you over the telephone, by electronic mail and on</li> <li>• investment management contracts or other forms (e.g., your name, social security number, address); and</li> <li>• Information about your portfolio transactions</li> </ul> <p>We restrict access to your personal and account information to those LCA employees and service providers and their employees who need to know that information to service your account. LCA, along with our service providers, maintains physical electronic and procedural safeguards that comply with federal standards to guard your nonpublic personal information.</p> <p>LCA considers your data to be private and confidential, and we will not disclose any nonpublic personal information about you to any unaffiliated third parties, except as permitted or required by law. If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice. It is also the policy of LCA to destroy confidential client data, when appropriate, to prevent unauthorized access to client information.</p> <p style="text-align: center;"><b><u>Additional Disclosure</u></b></p> <p>Robert Lindner serves on the TD Ameritrade Institutional Advisor Panel (“Panel”). The Panel consists of approximately twenty-four independent investment advisors that advise TD Ameritrade Institutional (“TDA Institutional”) on issues relevant to the independent advisor community. The Panel meets in person on average three to four times per year and conducts periodic conference calls on an as needed basis. Investment advisors are appointed to serve on the Panel for two year terms by TDA Institutional senior management. An investment advisor may serve longer than two years if appointed to additional terms by TDA</p>

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	<p>Institutional senior management. At times, Panel members are provided confidential information about TDA Institutional initiatives. Panel members are required to sign confidentiality agreements. TD Ameritrade, Inc. (“TD Ameritrade”) does not compensate Panel members. However, TD Ameritrade pays or reimburses Registrant for the travel, lodging and meal expenses Registrant incurs in attending Panel meetings. The benefits received by Registrant or its personnel by serving on the Panel do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by Registrant or its related persons in and of itself creates a potential conflict of interest and may indirectly influence Registrant’s recommendation of TD Ameritrade for custody and brokerage services.</p> <p>LCA's CEO/President, Robert Lindner, has extended a loan to LCA, the proceeds of which are used to fund part of LCA's operating expenses. The terms of the loan have been approved by LCA's Board of Directors and include that no interest is payable by LCA, that it has no specific term and that the CEO/President, Mr. Lindner, may call all or a part of the loan at any time. Mr. Lindner has informed LCA that he has no current intent to call the entire loan. Were Mr. Lindner to call part or the entire loan at a time when LCA lacked sufficient revenue to meet its operating expenses without the loan proceeds, LCA would immediately seek other potential sources of financing and provide clients with any required further disclosures related to such financing or lack thereof. LCA owns, pays for and is the beneficiary of a life insurance policy on the life of Mr. Lindner in an amount greater than any obligation under the loan agreement.</p>