



Disclosure Brochure

Advyzon Investment Management, LLC

CRD No. 318816

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Disclosure Brochure

(Form ADV Part 2A)

March 31, 2025

Item 1: Cover Page

This Disclosure Brochure provides information about the qualifications and business practices of Advyzon Investment Management, LLC. If you have any questions about the contents of this Brochure, please contact us at the phone number listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Advyzon Investment Management, LLC is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training.

Additional information about Advyzon Investment Management, LLC also is available on the SEC's website at www.adviserinfo.sec.gov. You can conduct a Firm search using our [CRD Number](#) provided above.

Item 2: Material Changes

We initially provide you with a copy of our Brochure when we enter into an agreement with you. On an annual basis, we will provide you with a Summary of Material Changes within 120 days of our fiscal year end. In the alternative, we may choose to provide you with a complete copy of our brochure.

Since our last annual update on March 26, 2024, we have made the following material changes:

- In our Turnkey Asset Management Program, we have added Diversified Municipal Bond SMA, Intermediate Bond Laddered SMA, Large Cap High Quality US Equity SMA, and Small/Mid Cap High Quality US Equity SMA strategies to our investment strategies. See Item 4 for details.
- We have added our Sphere Manager-Sponsored Models program. This service provides Advisory Firms with access to model portfolios that are generated by third-party investment managers ("Managers") to assist Advisory Firms in managing Client Accounts. Models include proprietary products of the Managers. As a result, the Manager receives income from assets invested in their

models. See Item 4 for more details on this program, and Item 5 for information on associated fees.

- We now offer our Personalized Index Engine which allows your Adviser to access certain financial indices ("Indices") to create a customized index for your account. See Items 4 for more details on this program, and Item 5 for information on associated fees. The Personalized Index Engine is also available in the Quantum Rebalancer, a technology solution provided by our parent company, YHLSoft, Inc., doing business as Advyzon. See Items 4 for more details on this program, and Item 5 for information on associated fees.
- We offer Tax Overlay Services to provide enhanced tax management strategies to improve the tax efficiency of your account. We model the tax impacts of trades to optimize after-tax returns. Strategies may also include tax loss harvesting when appropriate. See Items 4 for more details on this program, and Item 5 for information on associated fees.
- We have added Manager-Traded Models that provide Advisory Firms with access to third-party managers to manage client portfolios on an ongoing basis. See Items 4 for more details on this program, and Item 5 for information on associated fees.
- We occasionally host conferences and other events, such as workshops, seminars, or webinars. To defer the costs of these events, we may solicit sponsorships from entities that support our products and services, such as model providers, strategists, third-party managers, or portfolio managers. As a result of these sponsorships, these entities may be given an opportunity to have promotional booths, to speak or participate in speaker panels in sessions, to sponsor or participate in networking events, or to otherwise have visibility to or access to Advisory Firms or prospective advisory firm clients of AIM. See Item 10 for details.
- With regard to Manager-Traded Models, information regarding the aggregated trading policies has been added to Item 12, and proxy voting policies has been added to Item 17.

Other minor editorial changes have been made to provide clarification, or to correct grammatical or typographical errors. We do not consider these to be material changes.

As of December 31, 2024, we managed \$387,286,776 of assets under management on a discretionary basis, and \$115,140,094 of assets under management on a non-discretionary basis.

You may request a current copy of our Brochure at any time without charge by contacting us as described in [Item 1: Cover Page](#).

You may also obtain a copy of our current Brochure at www.adviserinfo.sec.gov. You can conduct a Firm search using our [CRD Number](#) provided above.

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Item 4: Advisory Business

Firm Overview

Advyzon Investment Management, LLC is a registered investment adviser registered with the United States Securities and Exchange Commission. We are a limited liability company organized in the State of Delaware in February 2022, and a wholly-owned subsidiary of YHLSOFT, Inc. Hailin Li is a majority owner of YHLSOFT, Inc., and is therefore an indirect owner of more than 25% of our firm. YHLSOFT, Inc. provides the Advyzon technology platform used by financial advisers for servicing client accounts.

Turnkey Asset Management Program

We provide a turnkey asset management program (the "Program") through which we offer investment management services, more fully described below. As used in this Brochure, "we," "us," and "our firm," refers to Advyzon Investment Management, LLC, and "you" and "your" refers to advisory clients who participate in our Program.

The Program is made available to you through an arrangement between us and your investment advisory firm ("Advisory Firm"). This arrangement allows your investment adviser representative ("Adviser") affiliated with the Advisory Firm to select from Investment Strategies (more fully described in [Investment Strategies](#) below) to be used to manage some or all of your investment assets.

Your Adviser is responsible for gathering sufficient information from you to evaluate your financial situation, investment objectives, financial goals, tolerance for risk, and investment time horizon. Because the management of your

investments is based on your financial circumstances, it is important that you provide complete and accurate information to your Adviser. Your Adviser is also responsible for determining whether your participation in the Program is appropriate for you, and for selecting an Investment Strategy to be used in managing your assets. Once an Investment Strategy is selected for you, we will manage your account on a discretionary basis according to the mandate of the selected Investment Strategy.

You will establish a brokerage account with a qualified custodian chosen by you or your Adviser. You grant us the authority to implement transactions in your account in accordance with your selected Investment Strategy. We will monitor and periodically rebalance your account as we deem necessary. In addition, we have the discretion to change the investment options and the allocation targets in the Investment Strategy at any time, without the prior consent of you, your Adviser, or your Advisory Firm.

Your Adviser will meet with you at least annually to discuss any changes to your financial circumstances that may affect your account or the Investment Strategy used to manage your account. You should promptly contact your Adviser when any changes occur in your financial circumstances that may affect the manner in which your account is invested.

Any questions regarding the management of your account should be directed to your Adviser. If necessary, your Adviser will communicate with our investment team.

If you or your Adviser decide that the selected Investment Strategy no longer meets your investment needs, your Adviser may select another Investment Strategy. We will implement the necessary transactions to allocate your account to the new Investment Strategy.

If an Investment Strategy is removed from the Program, we will notify your Advisory Firm of the change and request that action be taken to reassign your account by a specified date. If no action is taken by your Advisory Firm, we reserve the right to map your account to an alternative Investment Strategy. Your Advisory Firm's failure to act is considered consent to the mapping of your account to an alternative Investment Strategy.

You may place reasonable restrictions on specific securities or types, sectors, or industries of securities to be held in your Investment Strategy. We will make a reasonable attempt to honor any reasonable restrictions you wish to impose, but in the case of pooled investment vehicles such as mutual funds or ETFs where underlying holdings change frequently, we cannot guarantee that restrictions will always be enforced. In general, we may implement restrictions by either (a) increasing the relative proportions of other securities to replace the restricted security, or (b) increasing money market or cash positions in your account. Such restrictions imposed on your account would likely cause the performance of your account to differ from the performance of other accounts in the Investment Strategy.

As part of our Program, we provide additional administrative and operational services to your Advisory Firm. We will

calculate your fees based on the fee information provided by your Advisory Firm, collect the fees from your brokerage account, and distribute the fees to your Advisory Firm. Your fees will be reflected on your custodial account statement. We may also generate quarterly performance summaries for your account and provide them to your Advisory Firm to distribute to you.

We receive fees based on the assets under management in the Program. As a result, we have an incentive to direct assets to Program models. We provide tools to Advisory Firms allowing them to search, sort, and filter models based on the Advisory Firm's criteria. Our professionals may also provide additional information or education to Advisory Firms on the models available in the program. However, Advisory Firms have the sole discretion to choose the model portfolio for your assets.

Investment Strategies

Our Investment Strategies are constructed using mutual funds, exchange-traded funds ("ETFs"), fixed-income securities, and/or equities. Within each Investment Strategy, portfolios may vary based on account size or other account restrictions. We offer the following Investment Strategies:

Active/Passive

Our Active/Passive portfolios invest in mutual funds and ETFs from a diverse set of fund families, seeking to maximize returns for each level of equity. We build nine portfolios across a risk spectrum, from Income (20% equity) to Aggressive (98% equity).*

ETF

Our Exchange Traded Fund (ETF) Portfolios invest exclusively in ETFs to provide a very low cost, diversified set of nine asset allocation portfolios. The portfolios use only passive strategies and are more tax efficient than actively managed portfolios due to lower turnover and tax rules that result in reduced realized gain distributions.

Tax Sensitive

Our Tax Sensitive core portfolios seek to maximize after-tax returns for each equity level. We build nine portfolios across a risk spectrum, from Income (20% equity) to Aggressive (98% equity).*

The portfolios invest in ETFs, which carry unique tax advantages that mutual funds don't enjoy. The portfolios incorporate more growth-oriented investments, which typically pay less taxable dividends when compared to value-oriented investments. The portfolios shift underlying investments less often, which reduces the frequency of taxable realized gains. The portfolios include municipal bonds allocations, which usually pay lower pre-tax yields, but higher yields when compared to traditional treasury bonds after taxes.

ESG Active/Passive

Our Environmental, Social, and Governance (ESG) core portfolios invest in mutual funds and ETFs. We build nine portfolios across a risk spectrum, from Income (20% Equity) to Aggressive (98% Equity).*

The portfolios seek to maximize returns for each equity level while only investing in stock and bond mutual funds and ETFs that have an ESG mandate.

Foundational

Our Foundational portfolios invest with the goal of providing a reasonably diverse core solution for investors with very low account balances. We build nine portfolios across a risk spectrum, from Income (20% equity) to Aggressive (98% equity).* Each portfolio invests in a maximum of five ETFs plus cash.

Diversified Income

Our Diversified Income Portfolio invests in active mutual funds and passive ETFs. It targets the same risk level as a traditional diversified 50% equity and 50% bond portfolio. It is a broadly diversified / core strategy and can be used for an investor's entire investment program. Compared to our traditional Active/Passive 50% Equity portfolio, it trades off some long term growth for a higher level of annual income, for investors who value current income.

Focused High Income

Our Focused High Income Portfolio invests in active mutual funds and passive ETFs. It is a focused fund and is not as diversified as a typical core "all-in" asset allocation strategy. It is most often used as a component within a broadly diversified Investment Policy. The portfolio targets 50% exposure to equities. It targets a level of yield that is in the same range as High Yield Bonds (typically 4 to 8%), but the portfolio includes US and non-US equities, US and non-US bonds, and alternatives to reduce interest rate sensitivity and overall drawdown risk relative to a simple high yield bond fund.

Diversified Bond SMA

Our Diversified Bond SMA Portfolio invests in active mutual funds and passive ETFs. It provides broad exposure to fixed income investments and when paired with equities, can be part of a well-diversified portfolio. It includes some non-US bond exposure to add diversification and improve returns.

Diversified Municipal Bond SMA

Our Diversified Municipal Bond SMA Portfolio invests in active mutual funds and passive ETFs. It provides broad exposure to fixed income investments and when paired with equities, can be part of a well-diversified portfolio. Intermediate Bond Laddered SMA

The suite of individual bond laddered strategies provides investors with easy-to-use portfolios of individual bonds that pay consistent income. The maturity dates are spread evenly across a wide range of years, to help diversify duration risk. As bonds with various maturity dates mature at regular intervals, the principal is reinvested into the next year at the end of the maturity range. The Corporate bonds are diversified across multiple industries and across multiple investment grade credit ratings (AA, A, and BBB for Corporates and Munis) to provide exposure across multiple sectors and ratings. The Treasury bonds are spaced out across multiple time intervals to diversify across the yield / maturity curve. The Municipal bonds are diversified across regions, and among both general obligation and revenue bonds.

US Equity SMA

Our US Equity SMA Portfolio invests in active mutual funds and passive ETFs. It is a focused fund and is typically used as a component in a diversified client portfolio. It invests in a mix of value, core, growth, large, mid, and small cap US equities.

Large Cap High Quality US Equity SMA

The Large Cap High Quality US Equity Strategy starts with the S&P 500 as its universe of securities. We filter out companies with high debt ratios, low profit margins, and low cash flow to price ratios. We use fundamental research to identify securities that we believe will have consistent earnings growth, a barrier to entry for competitors for their product or service, and have historically outperformed the market. When assembling the final portfolio, we keep an eye on sector exposures, to not vary too much from the sector weightings of the S&P 500 index to reduce tracking error risk – we target sector exposures that are within 50% of the relative weight of the S&P 500 index.

Small/Mid Cap High Quality US Equity SMA

The SMID Cap High Quality US Equity Strategy starts with the Russell 2500 as its universe of securities. We filter out companies with high debt ratios, low profit margins, and low cash flow to price ratios. We use fundamental research to identify securities that we believe will have consistent earnings growth and a barrier to entry for competitors for their product or service. When assembling the final portfolio, we keep an eye on sector exposures, to not vary too much from the sector weightings of the Russell 2500 index to reduce tracking error risk – we target sector exposures that are within 50% of the relative weight of the S&P 500 index.

Non-US Equity SMA

Our Non-US Equity SMA Portfolio invests in active mutual funds and passive ETFs. It is a focused fund and is typically used as a component in a diversified client portfolio. It invests in both developed and emerging country equities.

US Equity Stock Index

We maintain nine US equity-oriented portfolios that are built with individual stocks. These are index funds that offer an alternative to traditional index ETFs and mutual funds. They invest in 40 stocks and are reviewed every 6 months. Benefits to using these index strategies over using a traditional ETF or indexed mutual fund is that investors have more control over the underlying holdings (clients can request exclusions) and clients can better control taxes. Drawbacks include lower diversification (most index funds hold much more than 40 stocks), and clients might miss out on some return from securities lending (which can add around 0.05% return each year). The nine index fund options are; Large Blend, Large Growth, Large Value, Mid Blend, Mid Growth, Mid Value, Small Blend, Small Growth, and Small Value.

Alternative Portfolio

Our Alternative strategy combines mutual funds and ETFs from alternative asset classes that fall outside of a traditional broad equity or fixed income investment strategy. We expect the mutual funds and ETFs to exhibit relatively low correlation with broad stock and bond indexes and to provide an

attractive addition to a diversified portfolio, particularly from a risk reduction perspective.

Thematic Equity Portfolios

We offer a set of Thematic Equity Portfolios that allow investors to gain exposure to specific market segments. Examples of portfolios offered include Defense Industry portfolio a Dividend Focused stock portfolios.

*Please note that the equity allocations presented above are targets only. Actual equity allocations will change over time. Investment Strategies are periodically rebalanced to targets as necessary.

Nucleus Model Marketplace

Nucleus is our model marketplace platform through which we provide Advisory Firms access to model portfolios created by AIM or by third-party strategists. Nucleus is available in conjunction with our Turnkey Asset Management Program described above, but is also available to Advisory Firms separately. The Nucleus model portfolios define allocations to specific investments. Your Advisory Firm may use a Nucleus model portfolio to manage all or part of your assets. Your Advisory Firm is responsible for determining the suitability of any Nucleus model portfolio that is assigned to your account.

Once the Advisory Firm selects the model portfolio, we will provide ongoing supervision of your account and will have discretion to make transactions in your account according to the selected model portfolio, including periodically rebalancing to portfolio targets. If the model portfolio is updated by the Strategist, AIM has the discretion to make transactions in your account as necessary to align with the updated model portfolio.

To employ Nucleus, Advisory Firms are required to enter into an agreement with us, which further details the services and fees for the program.

We receive fees based on the assets under management in the Nucleus program. In addition, strategists pay us an onboarding fee and an ongoing maintenance fee to be included in the Nucleus model marketplace. As a result, we have an incentive to direct assets to Nucleus models. We provide tools to Advisory Firms allowing them to search, sort, and filter models based on the Advisory Firm's criteria. Our professionals may also provide additional information or education to Advisory Firms on the strategists and models available in the program. However, Advisory Firms have the sole discretion to choose the model portfolio for your assets.

Sphere Manager-Sponsored Models

Sphere is our manager-sponsored model program through which we provide Advisory Firms with access to model portfolios that are generated by third-party investment managers ("Managers") to assist Advisory Firms in managing Client Accounts.

Your Advisory Firm may use a Sphere model portfolio to manage all or part of your assets. Your Advisory Firm is

responsible for determining the suitability of any Sphere model portfolio that is assigned to your account.

Once the Advisory Firm selects the model portfolio, we will provide ongoing supervision of your account and will have discretion to make transactions in your account within the parameters of the model portfolio, including periodically rebalancing to portfolio targets. If the model portfolio is updated, AIM has the discretion to make transactions in your account as necessary to align with the updated model portfolio.

You Advisor also has the option to utilize Sphere Models through Partnered Trading. When used with Partnered Trading, your Advisor defines the parameters for the supervision of your Account, such as the frequency of rebalancing and allowable drift from model targets. We will provide ongoing supervision of your account according to your Adviser's defined parameters.

To employ Sphere, Advisory Firms are required to enter into an agreement with us, which further details the services and fees for the program.

Note that each Sphere model includes proprietary products of the Manager that sponsors the model. As a result, the Manager receives income from assets invested in their models. The Manager also pays us an administrative fee to be included in the platform. As a result, we have an incentive to direct assets to these models. We provide tools to Advisory Firms allowing them to search, sort, and filter models based on the Advisory Firm's criteria. Our professionals may also provide additional information or education to Advisory Firms on the Managers available in the platform. However, Advisory Firms have the sole discretion to choose the Manager and model portfolio for your assets.

Personalized Index Engine

Advisory Firms may also choose to use our Personalized Index Engine which allows your Adviser to access certain financial indices ("Indices") to create a customized index that can be used for your account, when appropriate for your financial circumstances.

When used with our Turnkey Asset Management Program, or Nucleus Model Marketplace, once your Adviser creates the customized index, we will provide ongoing supervision of your account and will have discretion to make transactions in your account according to the Personalized Index, including periodically rebalancing to the Index targets. When the Personalized Index is reconstituted, AIM has the discretion to make transactions in your account as necessary to align with the updated Personalized Index.

When used with Partnered Trading, your Adviser creates the customized index and defines the parameters for the supervision of your Account, such as the frequency of rebalancing and allowable drift from index targets. Your Adviser will also determine the frequency upon which the index will be reconstituted (typically quarterly or annually). We will provide ongoing supervision of your account according to your Adviser's defined parameters.

The Quantum Rebalancer is a technology solution provided by our parent company, YHLSoft, Inc., doing business as Advyzon. Advisory Firms that subscribe to the Quantum Rebalancer through the Advyzon technology platform have the option of using the AIM Personalized Index Engine. When used with Quantum, your Adviser creates the customized index that they will trade through their discretionary relationship with you. Once your Adviser establishes the personalized index for your Account, AIM will provide ongoing updates to the Personalized Index. Your Adviser will retain full discretion to determine whether or not to execute trades in line with ongoing updates to the Personalized Index provided by AIM.

When the Personalized Index Engine is used in Quantum Rebalancer, AIM will have access to information regarding the Advisory Firm's clients, even if we are not providing trading services on your account.

Tax Overlay Services

We offer Tax Overlay Services to provide enhanced tax management strategies to improve the tax efficiency of your account. We model the tax impacts of trades to optimize after-tax returns. Strategies may also include tax loss harvesting when appropriate. Tax Overlay Services may be used with our Turnkey Asset Management Program, Nucleus Model Marketplace, Personalized Index Engine, Partnered Trading or Sphere Manager-Sponsored Models. This is an optional service that Advisory Firms may choose to offer. Consult with your Adviser or your Advisory Firm about whether the Tax Overlay Service is available.

Manager-Traded Portfolios

Through our Nucleus Model Marketplace, AIM also provides Advisory Firms to access third-party managers to manage client portfolios on an ongoing basis. We retain the third-party managers available on the platform through separate agreements between AIM and the third-party manager. We may perform periodic due diligence on third-party managers. However, we do not supervise the third-party managers' portfolios or compliance practices. Advisory Firms may also have agreements directly with the third-party manager.

Your Adviser is responsible for gathering sufficient information from you to evaluate your financial situation, investment objectives, financial goals, tolerance for risk, and investment time horizon, and for providing information to the third-party manager as necessary for the management of your portfolio. Your Adviser is responsible for selecting the third-party manager and the model portfolio or strategy to be used in managing your assets, and for monitoring the ongoing performance of your portfolio. Once selected, the third-party manager will manage your account on a discretionary basis, including implementing transactions in your account, according to the mandate of the selected model portfolio or strategy.

Certain third-party managers offer highly customized strategies and direct indexing portfolios. The customized strategies typically require additional input from you or your

Adviser, such as account-level security or sector restrictions or tilts, or customizations based on your specific tax, ESG, or sustainability preferences. It may also include modifications to asset allocations or tilts away from or toward certain investment styles as part of the portfolio construction.

Our platform is used to assist your Advisory Firm in gathering necessary information from you and transmitting it to the third-party manager. Third-party managers have direct access with your account custodian to manage your account, and will typically implement trades through their own trading platform or that of the custodian.

AIM only provides access to the program and may collect fees on behalf of the third-party manager, and does not provide any trading or rebalancing. Your Advisory Firm is solely responsible for monitoring your portfolio to ensure it remains consistent with your risk profile and investment objectives.

Outsourced Agent Services

Advisory Firms may also engage us to provide certain services as an Outsourced Agent, including client billing, performance reporting, and partnered trading services. In providing these services, we are not providing discretionary investment management of the Advisory Firm's client accounts. We are serving as the Advisory Firm's service provider, acting upon the Advisory Firm's directives and instructions.

Billing Services

Advisory Firms may engage us to assist with the billing of advisory fees. We will calculate advisory fees based on the fee information provided by the Advisory Firm, collect the fees from the clients' brokerage accounts, and distribute the fees to the Advisory Firm. Advisory fees will be reflected on clients' custodial account statement.

Performance Reporting

Advisory Firms may also engage us to generate quarterly performance summaries for their client accounts that they may make available to clients.

Partnered Trading Services

With regard to trading services, the Advisory Firm will establish the parameters, such as frequency of rebalancing and allowable drift from asset allocation targets, within which its client accounts will be traded. We will provide ongoing supervisory oversight and monitoring of client accounts, and will place trades according to the Advisory Firm's defined parameters. We will not place trades in client accounts outside of the Advisory Firm's defined parameters without prior authorization from the Advisory Firm.

Enterprise Platform Services

Our Turnkey Asset Management Program, Nucleus Model Marketplace, Sphere Manager-Sponsored Models, Personalized Index Engine, Tax Overlay Service, Quantum Rebalancer, Manager-Traded Models, and Outsourced Agent Services are also available to financial service organizations through our Enterprise Platform Services. These financial

service organizations can select any of our services in their entirety or portions thereof to offer them to third-parties, associated persons, or entities within their organization. The financial service organizations may rebrand our services with their internal nomenclature and branding, and can establish their own internal policies regarding such matters as fee structure, fee calculation and collection practices, client communications and documentation, and other protocols.

In addition to rebranding our services, financial service organizations may also rebrand our AIM strategist models available in the Nucleus Model Marketplace with their own internal nomenclature. When these white-labeled strategist models are used, AIM receives a Strategist Fee, as described in Nucleus Model Marketplace in Item 5 below, and may share a portion of the revenue generated with the financial service organization.

We are responsible for the delivery of our services to the enterprise platform, but we are not responsible for the internal policies established by each financial service organization.

Assets Under Management

As of December 31, 2024, we managed \$387,286,776 of assets under management on a discretionary basis, and \$115,140,094 of assets under management on a non-discretionary basis.

Item 5: Fees and Compensation

This section describes our standard fee practices; however, in some instances our fees are negotiable at our discretion. Fees for various services may differ based on factors such as the types and levels of services the Advisory Firm chooses, or the strategists, model portfolios, investment strategies, or third-party managers selected by the Advisory Firm. You are encouraged to review the Disclosure Brochure of your Advisory Firm for further information on fee billing arrangements.

Program Fee

For the Turnkey Asset Management Program, we receive an annual Program Fee based on a percentage of your assets under management in the Program, including cash and cash equivalents. Our Program Fee is typically combined with your Advisory Firm's fee and is charged using the same method, frequency, and billable market value as used by your Advisory Firm. In cases where we charge only our Program Fee, we typically charge our fees quarterly in advance, based on the average daily balance of your account during the prior calendar quarter (including cash and cash equivalents). The average daily balance is calculated by adding each day's balance for the quarter, then dividing the sum by the number of days in the quarter. The average daily balance is then multiplied by the quarterly portion of our annual Program Fee. Our maximum annual Program Fee is 0.35%. Our Program Fee will be deducted directly from your account. Fees for partial billing periods will be prorated based on the number of days in the billing period that the account was under management.

For fees billed in advance, if services are commenced during a billing cycle, typically prorated fees for the initial partial billing period will not be collected in advance but will instead be added to the fee for the first full billing cycle. Upon termination, any unearned fees paid in advance will be refunded.

The above describes our standard fee practices; however, in some instances we may adjust our fee billing arrangements based on the Advisory Firm's needs. You are encouraged to review the Disclosure Brochure of your Advisory Firm for further information on fee billing arrangements.

Our Program Fee is generally not negotiable, although we reserve the right to offer discounted fees, promotions, or waiver of fees under certain circumstances.

It is your responsibility to verify the accuracy of the fee we charge to your account. The fee we collect will appear on the account statement you receive directly from your account custodian.

Advisory Firm Fees

Our Program Fee does not include fees imposed by your Advisory Firm. You are encouraged to review the Disclosure Brochure of your Advisory Firm for further information on fees and billing practices.

Account Termination

You may terminate your participation in the Program at any time. We do not charge a termination fee to terminate our services; however, please note that your Advisory Firm or custodian may impose account termination fees or transfer fees if you decide to close or transfer your account. The custodian may also impose fees for administrative services, ACAT or wire transfers, or other services.

Nucleus Model Marketplace

When an Advisory Firm employs the Nucleus model marketplace, additional fees may be incurred. Your Advisory Firm is responsible for providing you with details on all applicable fees that are incurred in connection with the management of your account, and other relevant information, such as any conflicts of interest that are presented by the use of strategists or their model portfolios.

Additional fees may include:

- **Strategist Fee.** Nucleus strategist fees range between 0.00% and 1.00% annually, calculated as a percentage of assets in the model portfolios, depending on strategist and model selected. In some cases, strategists may receive additional compensation from investments in the underlying investments included in the model portfolios, which presents a conflict of interest. Note that when an AIM model portfolio is used, AIM receives a Strategist Fee in addition to the Administration Fee, Trading Fee, and Outsourced Services Fee described below.
- **Administration Fee.** For access to the Nucleus model marketplace, AIM receives a maximum annual

administration fee of 0.10% of assets in Nucleus Model Marketplace.

- **Trading Fee.** For trading services, AIM receives a maximum annual trading fee of 0.15% of assets in Nucleus Model Marketplace.
- **Outsourced Services Fee.** For additional services such as billing and performance reporting, AIM receives a maximum annual outsourced services fee of 0.05% of assets in Nucleus Model Marketplace.

Note that the Administration Fee, Trading Fee, and Outsourced Services Fee described above are based on the total assets over which AIM provides services to your Advisory Firm and may be combined into a single program or platform fee. The fees listed above are the maximum fees that could be applied, but actual fees may vary.

Your Advisory Firm may include the Nucleus fees in its total advisory fee, or the Nucleus fees may be in addition to your Advisory Firm's fee. Your Advisory Firm's fee practices are disclosed in its Disclosure Brochure. Fees are typically deducted from your brokerage account.

Fees are generally charged quarterly in arrears, calculated on the average daily balance of your account during the prior calendar quarter (including cash and cash equivalents). The average daily balance is calculated by adding each day's balance for the quarter, then dividing the sum by the number of days in the quarter. The average daily balance is then multiplied by the quarterly portion of the annual Nucleus Fee. Fees for partial billing periods are prorated. Because fees are collected in arrears, no refunds are given upon termination. However, Nucleus fees incurred prior to termination are due and payable upon termination.

In addition, strategists pay us an onboarding fee and an ongoing maintenance fee to be included in the Nucleus model marketplace.

Sphere Manager-Sponsored Models

When an Advisory Firm employs the Sphere program, additional fees may be incurred. Your Advisory Firm is responsible for providing you with details on all applicable fees that are incurred in connection with the management of your account, and other relevant information, such as any conflicts of interest that are presented by the use of strategists or their model portfolios.

For the Sphere program, we receive an annual fee of up to 0.10% of assets in the Sphere program.

Note that the Fee described above is based on the total assets over which AIM provides services to your Advisory Firm. The fees listed above are the maximum fees that could be applied, but actual fees may vary.

Your Advisory Firm may include the Sphere fees in its total advisory fee, or the Sphere fees may be in addition to your Advisory Firm's fee. Your Advisory Firm's fee practices are disclosed in its Disclosure Brochure. Fees are typically deducted from your brokerage account.

Fees are generally charged quarterly in arrears, calculated on the average daily balance of your account during the prior calendar quarter (including cash and cash equivalents). The average daily balance is calculated by adding each day's balance for the quarter, then dividing the sum by the number of days in the quarter. The average daily balance is then multiplied by the quarterly portion of the annual Nucleus Fee. Fees for partial billing periods are prorated. Because fees are collected in arrears, no refunds are given upon termination. However, Nucleus fees incurred prior to termination are due and payable upon termination.

For models included in Sphere, strategists do not charge a Strategist fee but instead receive additional compensation from investments in the underlying investments included in the model portfolios, which presents a conflict of interest. Note that Strategists that participate in the Sphere program will pay AIM compensation for the models included in the program. This creates an incentive for AIM to recommend these models to you, resulting in a material conflict of interest for AIM. Some strategies included in Sphere are also available in Nucleus, but may be available at a lower fee in Sphere.

Personalized Index Engine

When the Personalized Index Engine is used, we receive an additional fee, paid quarterly in arrears, and based on the average daily balance in your accounts included in the service. Your Advisory Firm may choose to include the Personalized Index Engine in your total fee, or it may be passed on to you separately and in addition to the fees charged by your Advisory Firm and/or AIM. Consult with your Advisory Firm for details.

Tax Overlay Service

When the Tax Overlay Service is used, we receive an additional fee, paid quarterly in arrears, and based on the average daily balance in your accounts included in the service. Your Advisory Firm may choose to include the Tax Overlay Service Fee in your total fee, or it may be passed on to you separately and in addition to the fees charged by your Advisor and/or AIM. Consult with your Advisory Firm for details.

Manager-Traded Models

AIM charges an Administration Fee for Manager-Traded Models. The Administration Fee is an asset-based fee, paid quarterly in arrears, and based on the average daily balance in your accounts included in the service. In addition, the third-party manager may charge a Strategist Fee which will vary based on the third-party manager used. In some cases, we may collect the fee from client accounts and distribute them to the third-party manager; in other cases, the third-party manager may collect the fees directly.

In addition, third-party managers pay us an onboarding fee and an ongoing maintenance fee to be included in the platform. Your Advisory Firm may choose to include the Manager-Traded Models Fees in your total fee, or it may be passed on to you separately and in addition to the fees

charged by your Advisor and/or AIM. Consult with your Advisory Firm for details.

Outsourced Agent Services Fees

Our fees for Outsourced Agent Services vary depending on the type and scope of services to be provided to the Advisory Firm. Fees may be negotiable. Specific fees and fee terms will be set forth in the Outsourced Services Agreement between us and the Advisory Firm.

Enterprise Platform Services Fees

Our fees for Enterprise Platform Services vary depending on the type and scope of services to be provided to the financial service organization. Fees may be negotiable. Specific fees and terms will be set forth in the Enterprise Platform Services Agreement between us and the financial service organization.

Other Fees

You should carefully review all fees charged by us, your Advisory Firm, and any investment options in your Investment Strategy to fully understand the total amount of fees that you incur in your account. Fees charged by us are separate and distinct from fees charged by your Advisory Firm. Depending on the arrangement your Advisory Firm has with the custodian who holds your account, you may also incur brokerage and transaction fees. You are encouraged to review the Disclosure Brochure of your Advisory Firm to fully understand the fees you will incur. In addition, the underlying investment options in your Investment Strategy (e.g., mutual funds, ETFs) may have additional fees and expenses. A description of these fees is available in the prospectus of each investment option, if applicable.

Compensation from Sale of Securities

Our firm and our employees do not receive any commissions or other compensation from the sale of securities or other investment products.

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

We do not accept performance-based fees – that is, fees based on a share of capital gains on or capital appreciation of the assets of a client. As such, we do not provide any side-by-side management of accounts that are charged a performance-based fee and accounts that are charged another type of fee, such as an hourly or flat fee or an asset-based fee.

Item 7: Types of Clients

Types of Clients

The Program is available to individuals (including high net worth individuals), corporations and other business entities.

Account Requirements

Our Program is offered through arrangements we have with unaffiliated Advisory Firms, and is only available to clients of these Advisory Firms. Generally, participation in the Program requires that you have minimum household investable assets of \$50,000; however, minimums vary by strategy and are typically set at the account level. In addition, we reserve the right to waive this minimum based on your financial circumstances and if your participation in the Program is suitable.

At the present time, our Program relies on the Advyzon technology infrastructure provided by our parent company, YHLSoft, Inc. Therefore, our Program is only available to Advisory Firms who also engage with YHLSoft, Inc. for the Advyzon technology services.

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

We believe that low cost, globally diverse portfolios offer the best opportunity to achieve investor goals. Academic research has identified asset allocation as the most important driver of portfolio returns and volatility and is accordingly, the part of the investing process where we spend a majority of our time. Our Investment Strategies are based on the same five step investment process:

1. *Forecast Asset Class Inputs.* We develop expected return, risk and correlation forecasts based on market expectations. These expectations are updated at least annually and rely on both long-term relationships and current market valuations. We use a “building blocks” approach that decomposes the return of each asset class into constituent parts, for which we maintain forecasts, including; the risk-free rate of return, an equity premium, inflation, investment grade credit spread, high yield credit spread, and an emerging market premium.
2. *Develop Asset Allocation Models.* We build asset class level models that seek to generate the highest returns for a given level of risk, considering correlations among asset classes (the way some assets tend to appreciate while others are depreciating and vice-versa). We start with a quantitative process called Mean Variance Optimization (MVO). We overlay professional judgment on the MVO output to set Strategic Asset Allocation (SAA) asset class targets for portfolios at least annually.
3. *Analyze Underlying Investments.* Next, we use qualitative and quantitative analysis to determine which securities to include in the portfolios. We analyze mutual funds, ETFs, fixed-income, and individual securities. We identify the types of asset classes that best categorize each underlying investment (many investments act as blends of asset classes) to allow us to set risk and return expectations for investments.
4. *Portfolio Construction.* We execute the asset allocation strategy with securities that are best suited for each

portfolio. We combine our asset class model target allocations with our underlying investment selections to come up with client portfolios that we believe are optimal.

5. *Monitor and Review.* Finally, we monitor portfolio holdings, weightings and performance at least quarterly, and review asset allocation at least annually. Updates are made as we deem necessary.

Risk of Loss

All investments are subject to risk. Investing in securities involves risk of loss that you should be prepared to bear.

You may incur a loss of principal – that is, the risk that the value of your securities may be less when sold or otherwise disposed of than the price you paid for the securities. Even if the value of the securities when sold is greater than the price paid, there is a risk that the appreciation will be less than inflation.

Past performance is no indication of future performance, and we cannot guarantee that your investment objectives will be met.

Investment Strategy Risks

Asset Allocation and Diversification. Asset allocation and diversification are strategies used to mitigate risks, but they do not guarantee a profit or protect against a loss.

Active/Passive Management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or ETFs. Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal). In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark.

Security Specific Risks

Equities. Investing in individual stock positions involves inherent risk, including the potential for greater concentration risk related to a single company or business enterprise. Significant risks relate to the company’s capitalization, quality of management, quality and cost of services, ability to manage costs, management of litigation risk, and ability to create shareholder value (i.e., increase the value of the company’s stock price). Foreign securities, in addition to the general risks of equity securities, have geopolitical risk, financial transparency risk, currency risk, regulatory risk, and liquidity risk. Equity securities are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds. Investing in mutual funds carries inherent risk. The major risks of investing in a mutual fund include the quality

and experience of the portfolio management team and its ability to create fund value by investing in securities that have positive growth, the amount of individual company diversification, the type and amount of industry diversification, and the type and amount of sector diversification within specific industries. In addition, mutual funds tend to be tax inefficient and therefore, investors may pay capital gains taxes on fund investments while not having yet sold the fund. Active mutual funds have higher fees and costs that can result in lower investment returns. Mutual funds are not guaranteed or insured by the FDIC or any other government agency.

Exchange Traded Funds (ETFs). ETFs are investment companies with shares that are bought and sold on a securities exchange. Generally, an ETF holds a portfolio of securities designed to track a particular market segment or index. Certain ETFs may not track underlying benchmarks as expected. ETF prices may vary significantly due to market conditions. An ETF may employ an investment strategy that uses high leverage ratios, resulting in higher volatility and risk of loss compared to strategies with less leverage. ETF transactions may be halted if the listing exchange's officials deem such action appropriate, if the shares are de-listed from the exchange, or in the event that a market-wide "circuit breaker" (an action tied to large decrease in stock process) halts stock trading generally. ETFs are not guaranteed or insured by the FDIC or any other government agency.

Investment Companies Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Fixed Income. Fixed-income securities are subject to interest rate risk and credit quality risk. The market value of fixed income securities generally declines when interest rates rise, and the credit quality of the obligor of fixed income securities could weaken leading to a lower credit quality and value of securities.

Cryptocurrencies. Cryptocurrencies, including Bitcoin, are currently unregulated, illiquid, uninsured, carry technological risks, require unique tax treatment, and are generally much more volatile than traditional currencies. Mutual funds and ETFs whose values are linked, whether directly or indirectly, to the value of one or more cryptocurrencies carry many of these same risks.

General Risks

Market Risk. Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk. An investment strategy and/or investment technique may not work as intended.

Small and Medium Cap Company Risk. Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

Turnover Risk. At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Limited markets. Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable, or find buyers at any price.

Concentration Risk. Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Interest Rate Risk. Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk. Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation. Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

Catastrophic Events. In addition to general market risks described above, our investment strategies may be subject to the risk of loss arising from direct or indirect exposure to a number of types of catastrophic events, such as global pandemics, natural disasters, acts of terrorism, cyber-attacks, or network outages. The extent and impact of any such event on investment strategies will depend on many factors, including the duration and scope of the event, the extent of any governmental restrictions, the effect on the supply chain, overall consumer confidence, and the extent of the disruption to global and domestic markets.

Cybersecurity Risks. The computer systems, networks and devices used to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches. Despite the various protections, systems, networks or devices potentially

can be breached. A client could be negatively impacted as a result of a cybersecurity breach.

Item 9: Disciplinary Information

Our firm and our management persons do not have any legal or disciplinary events to disclose that would be material to your evaluation of our advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities and Affiliations

Our firm and our management persons are not registered and do not have any applications pending to register, as a broker-dealer or a registered Adviser of a broker-dealer.

Our firm and our management persons are not registered and do not have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities

Our firm and our management persons do not have any relationship or arrangement with any broker-dealer, investment company, or other entity that is material to our advisory business or to our clients.

Our Chief Investment Officer, Brian Huckstep, CFA, CFP®, is the principal owner of Huckstep Asset Management, LLC, an independent registered investment adviser established in March 2020 and registered in the State of Illinois. His duties and responsibilities to Huckstep Asset Management, LLC, do not interfere with his duties and responsibility to our firm or the accounts we manage. Clients of Huckstep Asset Management, LLC may participate in the Program. Please see the Brochure Supplement attached for further information.

Conferences and Events

We occasionally host conferences and other events, such as workshops, seminars, or webinars. These events may be hosted solely by AIM, or in conjunction with our parent company, YHLSOFT, Inc., or other non-affiliated parties. To defer the costs of these events, we may solicit sponsorships from entities that support our products and services, such as model providers, strategists, third-party managers, or portfolio managers. As a result of these sponsorships, these entities may be given an opportunity to have promotional booths, to speak or participate in speaker panels in sessions, to sponsor or participate in networking events, or to otherwise have visibility to or access to Advisory Firms or prospective advisory firm clients of AIM.

In addition, we or our parent company may participate in sponsoring conferences or events of other entities that provide us with networking opportunities.

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

We have adopted a Code of Ethics ("Code") pursuant to SEC rule 204A-1. The Code establishes the standards of business conduct required of our employees, and policies and procedures designed to protect your interests. The Code includes, but is not limited to, the following provisions:

- To uphold our fiduciary duty to put your interest ahead of ours at all times.
- To comply with all applicable laws and to maintain a standard of conduct.
- To avoid actual or potential conflicts of interest where possible, and to fully disclose any actual or potential conflicts that may exist.
- To conduct all personal securities transactions of our employees in a manner consistent with the Code.
- To avoid giving or receiving gifts that may influence decisions.
- To prevent any abuse of our position of trust and responsibility, including the use of inside information we may obtain.

You may request a copy of our code of ethics by contacting us as described in [Item 1: Cover Page](#).

The Code permits our firm and our employees to buy or sell securities identical to those recommended to you; however, our firm and our employees are expressly prohibited from profiting at the expense of our clients and from competing with our clients. We monitor the personal security activities of certain employees to ensure compliance with this policy.

We do not engage in principal trades (where our firm buys or sells securities directly from clients) or cross-agency transactions (where our firm acts as the broker for both the client and the counter-party).

Item 12: Brokerage Practices

Your assets will be held in an account you establish with a qualified custodian, selected by you or your Adviser. Your custodian will send account statements directly to you on at least a quarterly basis. Trades in your brokerage account will be executed by the qualified custodian or its affiliated broker-dealer based on our trade instructions. We do not accept directed brokerage arrangements.

We participate in institutional adviser programs with qualified custodians, including Schwab Advisor Services, Fidelity Institutional Wealth Services, Shareholder Services Group, Pershing Advisor Solutions, Axos Clearing, LLC, Goldman Sachs Custody, Interactive Brokers, ETC Brokerage, Raymond James Financial Services, Inc., Trade-PRM, Inc., and First Clearing, LLC ("Qualified Custodians"). (Other Qualified Custodians may be made available in the future.) Through our participation in the institutional adviser programs offered by the Qualified Custodians, we receive various benefits,

provided without cost or at a discount, that may not be available to retail customers. These services are generally available to all advisers who participate in the institutional adviser program on an unsolicited basis at no charge to the advisers. There is no direct link between our participation in these programs and the investment advice that we provide. The benefits received by us through our participation in these programs do not depend on the amount of brokerage transactions directed to these custodians. Therefore, these services are not considered soft dollar arrangements.

The benefits we receive through these institutional adviser programs include access to certain investment options; execution of securities transactions; custodial services; access to an electronic trading platform, including access to aggregated block trading; the ability to deduct our Program Fee from client accounts; access to client account data; receipt of duplicate trade confirmations and account statements; research related products and tools; pricing and market data; access to software, technology or services; attendance at educational conferences and events; consulting on technology, compliance or other business matters; access to industry publications. Some of these products and services may benefit you directly, while others may benefit us by assisting us in the administration of our business and the management of client accounts, including accounts held with other custodians.

The receipt of these benefits from the Qualified Custodians creates a potential conflict of interest as we could have a financial incentive to recommend that you maintain your account with a specific custodian. However, the selection of the custodian used to hold your account is solely the responsibility of you and/or your Advisory Firm. We do not make recommendations regarding which custodian you should use.

We typically do not make recommendations to advisers regarding which custodian to use. However, if an adviser asks for recommendations, we may help the adviser determine which custodian(s) may be a good fit based on the adviser's business. Also note that some Qualified Custodians may engage our Enterprise Platform Services to provide services to other advisers or financial service organizations. When this occurs, we receive compensation from the Qualified Custodians for the services we provide. If we recommend a Qualified Custodian that engages our Enterprise Platform Services to an adviser, we will receive additional compensation. The adviser has sole discretion to choose which custodian the adviser will use.

Aggregated (Block) Trading

As a general policy, if we believe it is appropriate under the circumstances, securities orders placed for the same security on the same day may be combined (or "blocked" or "aggregated") with the objective of receiving the best overall blend of pricing and execution. The subsequent allocations among such accounts will be effectuated on a pro rata basis, based on the relative value of the accounts.

Accounts of our employees may be included in the combined orders and are subject to the same allocation methodology and average pricing.

Manager-Traded Models

Third-party managers may have the authority to place orders for client accounts through a broker other than the account custodian, if the third-party manager believes that best execution may be obtained through such other broker, including a broker that may be affiliated with the third-party manager. In such cases, commissions or other compensation to the brokers will be in addition to the program fee and in addition to your Advisory Firm's advisory fees. You should consult with your Advisory Firm for details on the associated fees, and carefully consider any additional trading costs before selecting a third-party manager.

Third-party managers have their own allocation policies and will direct how partial executions are allocated. AIM has no input or supervisory responsibility over the third-party manager's allocation policies. You are encouraged to review the third-party manager's allocation policies as disclosed in the third-party manager's disclosure brochure.

Trade Errors

Although we take reasonable steps to avoid trade errors, occasionally errors do occur. We seek to identify errors and work with your Advisory Firm or custodian to correct errors as quickly as possible, and to restore your account to a position as if the error had not occurred, without disadvantaging you or benefiting us. Errors may be corrected by either the purchase or sale of a security as originally intended, or in the form of monetary reimbursement to your account.

In all circumstances involving trade errors caused by us, we will ensure that clients are made whole. If the correction of the trade error results in a loss, we will incur that loss. We do not retain any client trade error gains.

Our policy is to monitor and reconcile trading activity to identify and resolve trade errors promptly. If a trade error is caused by an action or inaction of another party (such as your Advisory Firm, third-party manager, or custodian), we may help facilitate the error correction process.

Item 13: Review of Accounts

Our investment team will review accounts in the Program on at least a quarterly basis, or more frequently if necessary. Events that may trigger a special review would be unusual performance, addition or deletions of client-imposed restrictions, cash flows, excessive draw-down, volatility in performance, or buy and sell decisions by our investment team. Each account is reviewed for alignment with the Investment Strategy mandate.

Your custodian will provide you with trade confirmations for each transaction, account statements on at least a quarterly basis, and tax reporting statements. We encourage you to review these documents carefully, and alert your Adviser if you have any questions or concerns.

We do not deliver regular reports or statements to you; however, your Adviser may access reporting features available on our Program platform and deliver reports to you.

Item 14: Client Referrals and Other Compensation

Please see the information provided in [Brokerage Practices](#) above regarding benefits we receive as a result of our participation in the institutional adviser programs offered by the Qualified Custodians.

Professionals employed by our parent company YHLSoft, Inc. may refer qualified Advisory Firms to us. If a referred Advisory Firm engages our services, the referring professional will receive a referral fee.

Because our Program relies on the Advyzon technology, our parent company, YHLSoft, Inc. may, in some cases, in its sole discretion, offer Advyzon license fee discounts or waivers to Advisory Firms who engage our services. The decision to issue a discount or waiver may depend on such factors as the number of accounts or total assets under management in our Program. In addition, from time to time, we may offer promotional fee discounts to Advisory Firms. This can include discounts for technology services offered by YHLSoft, Inc.

We do not receive any other economic benefit from any other party who is not a client for providing investment advisory services to you.

Item 15: Custody

Our ability to deduct our Program Fee directly from your account is deemed to be a form of custody. Other than the ability to deduct our Program Fee, we do not accept custody of your funds or securities. All accounts are held with a Qualified Custodian.

Item 16: Investment Discretion

We do not have the discretion to choose an Investment Strategy for you. Your Adviser is responsible for determining which Investment Strategy is appropriate for you based on your financial situation.

Once an Investment Strategy is selected for you, we manage your assets in the Investment Strategy on a discretionary basis. This means that we have the discretion to make investment decisions with regard to your account, and to implement transactions to carry out those decisions without seeking or obtaining the prior permission of you, your Adviser, or your Advisory Firm.

You grant us discretionary authority to manage your account in the Advisory Agreement between you, your Advisory Firm, and us.

Item 17: Voting Client Securities

We will not exercise proxy voting authority. The obligation to vote proxies shall at all times rest with you or your Adviser.

Your custodian will send all proxy information directly to you or your Adviser. You should contact your Adviser or Advisory Firm if you have any questions about voting proxies.

Manager-Traded Models

Third-party managers exercising discretion over client accounts will vote proxies if voting authority is assigned to the third-party manager by the client. AIM is not able to advise if or how a third-party manager votes proxies on their strategies. Your Advisory Firm can contact the third-party manager for information on how proxies are voted.

Item 18: Financial Information

We do not require or solicit prepayment of more than \$1,200 in fees per client, six or more months in advance. Therefore, we are not required to include a balance sheet in this brochure.

We do not have any financial condition that is reasonably likely to impair our ability to meet our contractual commitments to clients.

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

Brochure Supplement for Brian Huckstep CFA, CFP®

(Form ADV Part 2B)

CRD No. 7246750

Advyzon Investment Management, LLC

4300 Commerce Court, Suite 260

Lisle, IL 60532

(844) 340-1898

March 31, 2025

Item 1: Cover Page

This Brochure Supplement is attached to the Disclosure Brochure of Advyzon Investment Management, LLC, and provides information about Brian Huckstep, CFA, CFP®, Chief Investment Officer. Please contact us at (844) 340-1898 if you have any questions about the contents of this Brochure Supplement, or to request a current copy of our Disclosure Brochure.

Additional information about Brian is available on the SEC's website at adviserinfo.sec.gov by conducting an Individual search using his CRD No. 7246750.

Item 2: Educational Background and Business Experience

Born 1970

Educational Background

- 8/2003, The University of Chicago Booth School of Business, Masters of Business Administration (MBA), Concentrations in Finance, Strategy and Entrepreneurship
- 5/1992, The University of Michigan, Bachelor of Arts, Major in Economics

Business Experience

- 2/2022 - Present, Advyzon Investment Management, LLC, Chief Investment Officer
- 3/2020 - Present, Huckstep Asset Management, LLC, Owner and Investment Adviser Representative
- 1/2016 - 11/2019, Morningstar Investment Management, Senior Portfolio Manager, Co-Head of Target Risk Strategies
- 4/2005 - 12/2015, Ibbotson Associates, Portfolio Manager, Head of U.S. Asset Allocation
- 12/2003 - 4/2005, Morningstar, Director of Data Acquisition
- 8/1994 - 6/2003, Northern Trust, Sr. Investments Product Manager, Vice President
- 8/1992 - 5/1994, Bank One, Commercial Lending

Professional Designations, Licensing and Exams

Certified Financial Analyst® (CFA®)

The Chartered Financial Analyst® (CFA®) designation is conferred by the CFA Institute. A financial analyst seeking membership to the CFA Institute must: meet eligibility requirements; fully comply with the CFA Code of Ethics and Standards of Professional Conduct; study books, journal articles, and other readings designated by the CFA Institute; successfully pass three examinations, each approximately six hours in length and administered by the CFA Institute. The candidate for the CFA designation must have at least a single current and principal engagement: in financial analysis of securities investment for a bank, investment company, insurance company, or other financial services or investment management firm; as an assistant, associate, or full professor or dean of a college or university, who teaches and/or researches; as an economist involved in financial analysis of securities investment; as a portfolio manager; as a financial analyst of securities investment within a public agency; as a financial analyst of securities investment for a corporate pension, profit sharing, or other retirement fund; or as a manager of financial analysts or portfolio managers involved with securities investment and who, before assumption of management obligations, was a financial analyst or portfolio manager. The CFA is awarded to candidates who have passed the examinations and met the other requirements specified by the CFA Institute.

CERTIFIED FINANCIAL PROFESSIONAL® (CFP®)

The CERTIFIED FINANCIAL PLANNER® CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education.* Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination.* Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly

diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

- *Experience.* Complete at least three years (at least 6,000 hours) of full-time financial planning-related experience or complete at least two years (at least 4,000 hours) of full-time financial planning-related experience while under the supervision of a CFP® Professional; and
- *Ethics.* Agree to be bound by CFP Board's Code of Ethics and Standards of Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education - Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and Standards of Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics - Renew an agreement to be bound by the Code of Ethics and Standards of Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3: Disciplinary Information

Brian has not been the subject of any legal or disciplinary actions.

Item 4: Other Business Activities

In addition to acting as the Chief Investment Officer of Advyzon Investment Management, LLC, Brian is the principal owner and investment adviser representative for Huckstep Asset Management, LLC. Clients of Huckstep Asset Management, LLC may, but are not required to, participate in the Program offered by Advyzon Investment Management, LLC.

Item 5: Additional Compensation

Other than as disclosed in Other Business Activities above, Brian does not receive economic benefit from any third party for providing investment advisory services on behalf of Advyzon Investment Management, LLC to its clients.

Item 6: Supervision

Brian is subject to written policies and procedures, including the Compliance Manual and Code of Ethics. Meghan Holmes, Chief Compliance Officer, is responsible for oversight and supervision of the compliance program. He may be reached at (844) 340-1898.

Privacy Policy

Financial companies choose how they share your personal information. Federal law also requires us to tell you how we collect, share, and protect your personal information.

We receive your personal information from your Adviser and from the Qualified Custodian that holds your account. This information can include your social security number and date of birth. We also receive information regarding your account number, balance, holdings, and transactions.

All financial companies need to share their clients' personal information to perform their operations, such as to process your transactions and maintain your account. When we share your information with third-parties as necessary for the management of your account, we require strict confidentiality in handling your information.

We may also be required to share your information with other third parties to comply with legal requirements, such as subpoenas or court orders; to respond to regulatory examinations; to address fraud, security, or technical issues; or otherwise to protect your rights, property or security.

We may share anonymous or aggregated information with third parties to help deliver products, market our services, and provide research content.

Federal law gives you the right to limit only the sharing of your information with affiliates or third-parties for marketing purposes. We do not share your information for this purpose.

To protect your personal information, we have established an information security program which includes policies addressing acceptable use and access to confidential business information and personal information which may be contained in our information systems. We maintain physical, electronic, and procedural safeguards reasonably designed to guard personal information from loss, misuse, or unauthorized access, disclosure, alteration, or destruction of the information that has been provided to us.

We take commercially reasonable measures that comply with applicable laws and industry standards to secure and protect information transmitted via or stored through our information systems. These measures include computer safeguards and secured files and buildings. Nevertheless, no security system is impenetrable. If you become aware of any breach of our security system, please notify us immediately.

Federal securities regulations require us to maintain certain information regarding you and your account for a period of time after you terminate your participation in the Program. We will continue to maintain and protect your information for the required retention period.

For California Residents

The California Consumer Privacy Act ("CCPA") provides California residents with rights to receive certain disclosures regarding the collection, use, and sharing of "Personal Information," as well as rights to know, access, delete, and limit

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sharing of Personal Information. For purposes of this section, "Personal Information" has the meaning given in the CCPA but does not include information exempted from the scope of the CCPA. Due to the nature of our Program, much of the information we collect is exempt from the CCPA because it is covered by federal or state financial and/or data privacy laws.

To the extent that we collect Personal Information that is subject to the CCPA, your rights as California resident to request access and deletion of that information are as described below.

We do not sell Personal Information to third parties. However, as described in this Privacy Policy, we may share Personal Information with a third party as necessary for the delivery of services under our Program.

As a California resident, you have the following rights listed below. However, these rights are not absolute, and in certain cases we may decline your request or comply with it in a more limited way than you anticipated, as permitted by law.

- You may request the following information about how we have collected and used your Personal Information during the past 12 months:
 - Categories of Personal Information we have collected;
 - Categories of sources from which we collected Personal Information;
 - The business or commercial purposes for collecting and/or selling Personal Information;
 - Categories of third parties with whom we share Personal Information;
 - Whether we have disclosed your Personal Information for a business purpose, and if so, the categories of Personal Information received by each category of third-party recipient; or
 - Whether we've sold your Personal Information, and if so, the categories of Personal Information received by each category of third-party recipient.
- You may request a copy of the Personal Information that we have collected about you during the past 12 months.
- You may request in certain circumstances that we delete Personal Information that we have collected directly from you.
- If we sell your Personal Information, you may opt-out.
- You are entitled to exercise the rights described above free from discrimination.

In order to process a request to know about or delete Personal Information we collect, disclose, or sell, we must verify your request. We reserve the right to confirm your California residency to process your requests and will need to verify your identity to process your requests. To protect against unauthorized access and use, we use security measures, including cybersecurity measures, that comply with federal law.

For More Information

Please contact us at (844) 340-1898 if you have any questions or concerns about our privacy policies.