



Investment Advisor Brochure Form ADV Part 2A

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(03/2026)

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This investment advisor brochure provides information about the qualifications and business practices of Heck Capital Advisors, LLC ("Heck Capital" or the "Firm"). If you have any questions about the contents of this brochure, please contact us at (715) 361-1500 or heckcapital@heckcapital.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Heck Capital Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

Item #2 - Material Changes Since Last Annual Update

No material changes have been made.

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Item # 4 - Advisory Business

Heck Capital Advisors, LLC ("Heck Capital" or the "Firm") is a SEC Registered Investment Advisor and is a Wisconsin Limited Liability Company. The Firm offers investment advisory services, including non-discretionary consulting, financial planning and retirement plan advisory services. A description of these management service programs is set forth below. The Firm's other investment advisory services include discretionary and non-discretionary investment management services to its Clients. Total assets include discretionary, non-discretionary-consulting, and non-continuous advisory services. A description of these management services is listed in Form ADV 2A Appendix 1. The management services as described in Appendix 1 are incorporated in a wrap fee, thus the advisor fees, transactions and related investment services are implemented in the wrap fee. Consulting, Financial Planning and Retirement Planning services are incorporated with a separate fee. Heck Capital has been providing investment advisory services since May of 2007; however, the Principal(s) have been providing investment advisory services for over 35 years. David and Ken Heck are each control persons of Heck Capital owning greater than 25% of the Firm.

The Principal(s) / Owner(s) are as follows and do not engage in any other business:

Kenneth R. Heck, Chief Financial Officer / Senior Director

Ken Heck, born in 1967, is the Chief Financial Officer and Senior Director at Heck Capital Advisors. Ken began his investment career in 1990 and he launched the firm's Portfolio Management strategies in 1993, which were initially implemented while he was employed by another investment firm. His experience includes over 35 years of leadership in the Portfolio Management structure for Heck Capital as well as research and portfolio construction. Ken is a Portfolio Manager and member of the Investment Committee, and a member of the Investment Advisory Committee.

Education Achievements & Honors:

- Indiana University, Bachelor of Science Degree in Economics
- Registered Investment Adviser Representative

David M. Heck, CIMA®, AIF®, Chief Operating Officer / Senior Director

David M. Heck, born in 1970, is the Chief Operating Officer and Senior Director with Heck Capital Advisors. David began his investment and planning career in 1992. David is a Portfolio Manager and member of the Investment Committee, and a member of the Investment Advisory Committee. David is also primarily responsible for researching and monitoring the Heck Capital Institutional and Consulting Programs.

Education Achievements & Honors:

- Indiana University, Bachelor of Science Degree in Public Affairs, majoring in Public Financial Management
- Certified Investment Management Analyst (CIMA®), designation awarded by Investment Management Consultants Association (IMCA), completed through University of Pennsylvania, Wharton School of Business
- Accredited Investment Fiduciary (AIF®), designation awarded by Center for Fiduciary Studies, associated with the University of Pittsburgh
- Series 65, Uniform Investment Adviser Law Examination

Consulting Services

Heck Capital provides regular and continuous consulting or management services to client portfolios for Investment Consulting, Financial Planning, and Retirement Plan Consulting.

The level of non-discretionary service(s) is dependable on the level of detail, amount of monitoring, ability to assist in making a transaction or assisting in a transaction, and/or the level of ongoing advice provided to the client. Assets under management are dependent on what services are provided. The following Investment Consulting, Financial Planning, and Retirement Plan Consulting services are listed below. In combination with

these services, a service offering to simplify and consolidate client reporting and objectives are offered for Heck Capital's [CapitalCENTRAL®](#) services which include the following:

- Family guidance through legacy and succession planning
- Professional connection and cooperation with related advisors: CPA, attorney, insurance, banker, etc.
- Education, tuition, and expense planning for children/grandchildren
- Risk managements and asset protection
- Reporting for all other assets, including assets held outside Heck Capital
- Secure electronic storage for personal financial files

Investment Consulting / Advisory Services

Heck Capital provides Non-Discretionary Investment Consulting / Advisory Services to clients on an hourly, flat or asset based fee basis. Investment Consulting / Advisory Services include, but are not limited to, analysis of the client's financial assets with recommendations regarding the purchase or sale of investments consistent with the client's investment objective. Investment Consulting / Advisory Services include a report being provided to the client which may be in writing if requested by a client. Services usually do not include financial or retirement planning or other projects not involving investments; however, such services can be provided by a separate agreement.

Heck Capital's services can include investment evaluations and asset allocation recommendations relating to investments in client's account, or related customer accounts.

After an initial analysis of a client's financial circumstances is performed and initial advice provided to a client, Heck Capital makes available on-going Consulting Services, also on an hourly, flat or asset based fee basis, designed to continue the advisory relationship to implement, up-date and modify the initial advice provided.

Financial Planning Services

Heck Capital provides Financial Planning Services and may charge on an hourly or flat fee basis. Financial Planning Services are performed in the scope requested by a client and can include any of the following: Portfolio Analysis, Investment Planning, Investment Selection and Monitoring, Retirement Planning, Estate Planning, Education Planning, Mortgage and Debt Analysis, Insurance Analysis or other review as specified by the client. Consideration is given to risk tolerance, income needs and short and long-term financial objectives. Financial Planning results in a report being provided to the client, which may be in writing if requested by the client. Heck Capital relies on instructions provided by client through statements, records, and various client information. The agreement between Heck Capital and a client for Financial Planning may be terminated by either party at any time by written notice to the other. Any fee due, but not yet paid by a client, is due promptly after termination of the services agreement. Any unearned, prepaid fee is returned to the client.

The decision to accept any recommendation or advice provided by Heck Capital in its Financial Planning Services and all decisions regarding implementation thereof are left to the client. Clients are free to implement recommended transactions through broker-dealers and other service providers other than those recommended by Heck Capital. Clients should evaluate independently the transaction execution services recommended by Heck Capital Portfolio Managers, including the reasonableness of any transaction price and commission.

Retirement Plan Consulting Services

Heck Capital provides continuous Non-Discretionary and Discretionary investment advisory service(s) to the Sponsor with respect to the Plan and, only if directed in writing by the Sponsor to do so, to other fiduciaries of the Plan. These investment advisory services (the "Investment Advisory Services") are as follows:

Advise the Sponsor or applicable fiduciary, if requested, as to the necessary terms of an Investment Policy Statement ("IPS") for the Plan;

Advise Sponsor with respect to identifying several investment managers in searches for each asset category in accordance with the IPS;

Provide advice to Sponsor as to engagement, retention, or termination of specific investment managers based on the Plan's IPS, provided, however, that Sponsor may engage managers which are not part of the original searches provided by Heck Capital;

Review periodically the suitability of the Plan's investments in accordance with the Plan's IPS and provide advice to the Sponsor as to whether specific Plan investments are in accordance with the Plan's IPS, provided, however, that Sponsor may engage tactical asset allocation changes which are not part of the searches or reviews provided by Heck Capital; and

Report on a timely and agreed upon basis to Sponsor and, as appropriate, the other fiduciaries of the Plan, on investment performance.

In providing the foregoing services, Heck Capital shall have no responsibility to advise or assist with respect to assets that constitute employer securities, employer real property or participant loans or that are held in individual brokerage accounts.

Heck Capital shall provide the following general consulting services (the "Consulting Services") to the Sponsor, as directed by Sponsor, within a framework of policies, interpretations, rules, practices and procedures established by Sponsor:

Assist the Sponsor with establishing goals, standards, and benchmarks relating to Plan investments;

Assist the Sponsor in conducting on-going searches for asset allocation and diversification sectors for the Sponsor which have historically performed in a manner generally consistent with the Plan's IPS; and

Provide the following administrative services:

- a) Service Review: Heck Capital will confer with the directed trustee, record-keeper, Investment Manager, and Sponsor to assist in on-going service reviews and Investment Manager changes on an as needed basis. The directed Trustee and record-keeper, according to the Plan document, is responsible for completing administrative duties of the Plan according to instructions from the Sponsor.
- b) Third Party Services: If Heck Capital becomes aware of third parties that can provide custody or administrative services for the benefit of the Plan; it will consult with the Sponsor regarding the utilization of such services.

Item #5 - Fees and Compensation

Investment Consulting / Advisory Services

Heck Capital may charge fees for Investment Consulting / Advisory Services based on hourly, flat, or a percentage of assets as explained below.

Hourly

Heck Capital's hourly fee depends upon the nature and scope of the advice requested by the client, the amount and nature of the research required to complete the project, and the nature and number of reports requested by the client. The hourly fee may be calculated based upon each professional staff member's time spent on a project. Prior to engagement, each client signs an agreement which provides an estimate of the total fee for services. The hourly fee varies from \$100 to \$500 and is at the discretion of Heck Capital and is negotiable.

Flat

Heck Capital's flat fee is quoted in advance and depends upon the nature and scope of the advice requested by the client, nature and number of investments in a client's portfolio, amount and nature of research required to complete the project and the scope and number of reports requested by the client. Flat fees are negotiated based on the nature of the work, not by the type of client. Prior to engagement, each client signs an agreement which provides an estimate of the total fee for services. The flat fee typically varies from \$1,000 to \$500,000 and is at the discretion of Heck Capital. The fee may be higher in those instances where the client requests more comprehensive services.

Percentage of Assets

Heck Capital's asset based fee is an annual fee, payable quarterly before services are provided. Fees are calculated based on the market value of the assets in the client's account. The initial fee is charged from the date of the agreement through the end of the first calendar quarter in which the account is opened. Thereafter, fees are payable quarterly based upon the market value of assets at the end of the immediately preceding calendar quarter. Assets deposited to the account during any quarter may be charged a prorated quarterly fee based upon the number of days remaining in the quarter. No refund of fees paid or due for a particular calendar quarter will be made if assets are withdrawn during such quarter. In the event of contract termination, all unearned prepaid fees are prorated for the days remaining in the quarter and returned to the client. The fee excludes all transaction and custodian costs, including brokerage commission and account maintenance fees.

The agreement between Heck Capital and a client for Investment Consulting Services may be terminated by either party at any time by written notice to the other. Any fee due, but not yet paid by a client, is due promptly after termination of the agreement. Any unearned portion of a prepaid fee is returned to the client. The decision to accept any recommendation or advice provided by Heck Capital and all decisions regarding thereof are left to the client. Clients are free to implement recommended transactions through broker-dealers and other service providers other than those recommended by Heck Capital and clients are advised to evaluate independently the transaction execution services recommended by Investment Advisor. Heck Capital may bill Client directly or deduct its fee from Client account.

Heck Capital does not guarantee the results of its recommendations and losses can occur from receiving Investment Consulting Services.

Financial Planning Services

Heck Capital may charge fees based upon an hourly or flat basis for Financial Planning Services. Also, if Financial Planning services are part of normal business operations for investment management, Heck Capital at its discretion can waive all Financial Planning fees. Heck Capital may bill Client directly or deduct its fee from Client account.

Hourly

Heck Capital's hourly fee depends on the Financial Planning Services provided. The exact hourly fee depends upon the nature and scope of the advice requested by the client, nature and number of investments in a client's portfolio, amount and nature of research required to complete the project and the scope and number of reports requested by a client. Hourly fees can be offered to clients and fees are not contingent upon receiving certain services. The hourly fee may be negotiated based on the nature of work and not by the type of client. Prior to engagement, each client signs an agreement which provides an estimate of the total fee for services. The hourly fee ranges from \$100 to \$500 and is at the discretion of Heck Capital.

Flat

Flat fees are quoted in advance depending upon the nature and scope of the advice requested by the client, nature and number of investments in a client's portfolio, amount and nature of research required to complete the

project and the scope and number of reports requested by a client. Flat fees may be negotiated based on the nature of the work, not by the type of client. Prior to engagement, each client signs an agreement which provides an estimate of the total fee for services. The flat fee typically varies from \$1,000 to \$50,000 and is at the discretion of Heck Capital. The fee may be higher in those instances where the client requests more comprehensive services.

Client Directed Accounts

Heck Capital may charge for services on Client Directed accounts, including reporting, monitoring, or administrative services, however the services are not ongoing in a supervisory capacity. Heck Capital is not responsible with respect to client's selection, holding, and/or liquidation of the underlying securities. Clients acknowledge that Heck Capital is not assuming any investment responsibility and agrees to indemnify and hold harmless Heck Capital for any loss or damage resulting from client or any other party purchasing, retaining, or selling any securities in a client directed account.

CapitalCENTRAL® Services

Services via CapitalCENTRAL® that exceed the traditional Financial Planning services may or may not incur additional costs/fees based upon factors including but not limited to: assets under management and/or the relationship with Heck Capital. All fees are negotiable and may be charged on an hourly, flat, or asset based fee structure, Heck Capital at its discretion can waive all CapitalCENTRAL® fees. Heck Capital may bill Client directly or deduct its fee from Client account.

Hourly

Heck Capital's hourly fee depends on the services provided. The exact hourly fee depends upon the nature and scope of the advice/services required by the client, amount and nature of research required to complete the project and the scope and number of reports requested by a client. Hourly fees can be offered to clients and fees are not contingent upon receiving certain services. The hourly fee may be negotiated based on the nature of work and not by the type of client. Prior to engagement, each client signs an agreement which provides an estimate of the total fee for services. The hourly fee ranges from \$100 to \$500 and is at the discretion of Heck Capital.

Flat

Flat fees are quoted in advance depending upon the nature and scope of the advice/services required by the client, amount and nature of research required to complete the project and the scope and number of reports requested by a client. Flat fees may be negotiated based on the nature of the work, not by the type of client. The flat fee typically varies from \$0.00 to \$10,000.00 and is at the discretion of Heck Capital.

Percentage of Assets

The annual fee range of 0.00% - 1.00% is negotiable and is payable quarterly before services are provided or according to a mutually agreed schedule. Fees are calculated on the value of the client's assets on the last calendar day of the previous quarter. For any partial quarter, fees are pro rated based upon the number of days that the client receives services during such quarter. Fees may be paid by the client or withdrawn directly from account by prior authorization of the client. No adjustment to the fee is made in the event assets are withdrawn from the account. Heck Capital reserves the right to amend its fee upon 15 days advance notice to clients. The services agreement may be terminated upon 30 days written notice. Upon termination, all unearned, prepaid fees are returned to the client.

Retirement Plan Consulting Services

Heck Capital may charge fees based upon an hourly, flat, or annual fee for Retirement Plan Consulting Services as described below.

Hourly

Heck Capital's hourly fee depends on the Retirement Plan Consulting Services provided. The exact hourly fee depends upon the nature and scope of the advice requested by the client, nature and number of investments in a client's portfolio, amount and nature of research required to complete the project and the scope and number of reports requested by a client. Hourly fees can be offered to clients and fees are not contingent upon receiving certain services. The hourly fee may be negotiated based on the nature of work and not by the type of client. Prior to engagement, each client signs an agreement which provides an estimate of the total fee for services. The hourly fee ranges from \$100 to \$500 and is at the discretion of Heck Capital.

Flat

Flat fees are quoted in advance depending upon the nature and scope of the advice requested by the client, nature and number of investments in a client's portfolio, amount and nature of research required to complete the project and the scope and number of reports requested by a client. Flat fees may be negotiated based on the nature of the work, not by the type of client. Prior to engagement, each client signs an agreement which provides an estimate of the total fee for services. The flat fee typically varies from \$1,000 to \$400,000 and is at the discretion of Heck Capital. The fee may be higher in those instances where the client requests more comprehensive services.

Percentage of Assets

The annual fee range of 0.00% - 1.00% is negotiable and is payable quarterly before services are provided or according to a mutually agreed schedule. Fees are calculated on the value of the Plan assets on the last calendar day of the previous quarter. For any partial quarter, fees are pro rated based upon the number of days that the Plan received services during such quarter. Fees may be paid by the client or withdrawn directly from the plan assets by prior authorization of the client. No adjustment to the fee is made in the event assets are withdrawn from the Plan. Heck Capital may bill Client directly or deduct its fee from Client account. Heck Capital reserves the right to amend its fee upon 15 days advance notice to clients. The services agreement may be terminated upon 30 days written notice. Upon termination, all unearned, prepaid fees are returned to the client.

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

Heck Capital does not charge performance-based fees. All fees are disclosed above.

Item #7 - Types of Clients

Heck Capital provides advice to individuals, pension and profit sharing trusts, foundations, corporations and other institutions. The Firm may also provide consulting services to partnerships and other types of entities. Heck Capital may at times provide its investment advice to institutions wishing to have the investments in their client accounts evaluated. Besides providing services to individuals, savings institutions, pension and profit sharing plans, endowments and foundations, trusts, estates and business entities, Heck Capital is available to provide advisory services to broker-dealers and other investment advisors. There is typically a minimum household account size to receive investment management services of \$1,000,000 or a \$5,000 yearly cost of service. This minimum is negotiable and may be waived at the discretion of Heck Capital.

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

Methods of Analysis

Heck Capital Portfolio Managers may use a combination of both fundamental analysis and technical strategies. Heck Capital Portfolio Managers carefully evaluate the performance histories of funds and other securities, when evaluating client investments and executing purchases and sales in styles based upon the results of their analysis.

Sources of Information

When providing counseling services, Heck Capital Portfolio Managers and Advisors rely upon general securities and market knowledge, published investment strategies and general sources of securities and market information. Heck Capital may also pay third party firms for providing advice about specific strategies and transactions to use. Prior to applying such information, it makes a judgment about whether doing so is suitable for the client.

Investment Strategies

When counseling a client or preparing financial plans for clients, Heck Capital makes recommendations relating to various investment asset types it believes will meet a client's needs. Investment strategies which the client chooses to utilize in the implementation of such plans could take virtually any form, depending upon the client's particular circumstances and the asset type involved.

Risk of Loss

Risk of loss is inherent with every investment choice. Although research has consistently demonstrated that risk is best reduced through diversification of assets, a diversified portfolio with more aggressive investments may experience greater volatility than a less aggressive portfolio, especially over the short-term.

If clients have an extremely short investment horizon, or are risk averse, a more conservative portfolio may be more appropriate. However, if clients have a longer time horizon and are willing to tolerate principal fluctuations due to market volatility, a more aggressive portfolio may be appropriate. Therefore, the level of risk assumed with investments will vary depending on the investment time frame, objectives and volatility.

All investment and economic markets go through cycles. Thus, there will be periods of time where certain asset classes outperform other asset classes. Although Heck Capital Representatives and Portfolio Managers will use their best professional judgment when giving advice, there is no way to guarantee the results of any recommendation or that loss will not occur. It is important to realize that at any point in time, client's investment portfolios may be worth more or less than the original amount invested. In limited circumstances, Heck Capital recommends that certain consulting clients invest in privately placed collective investment vehicles. The managers of these vehicles have broad discretion in selecting the investments. In addition, the vehicles are not registered as investment companies, and are not regulated as such. Private placements have an absence of full regulatory oversight, but they are still subject to limited regulation and anti-fraud provisions. There are numerous other risks in investing in these securities. Clients should consult each fund's private placement memorandum and other offering documents explaining such risks prior to investing.

Cybersecurity Risk: The computer systems, networks, and devices used by Heck Capital and its service providers employ a variety of protections designed to protect damage or interruption from computer viruses, network and computer failures, and cyber attacks. Despite such protections, systems, networks and devices potentially can be breached. Cyber attacks include, but are not limited to, gaining unauthorized access to digital systems for purposes of corrupting data, or causing operational disruption, as well as denial-of-service attacks on websites. Cyber incidents may cause disruptions and impact business operations, potentially resulting in financial losses, the inability of Heck Capital or service providers to trade, violations of privacy and other laws, regulatory fines, reputational damage, reimbursement costs, and additional compliance costs, as well as the inadvertent release of confidential information.

Item #9 - Disciplinary Information

Heck Capital does not have any material disciplinary information to report.

Item #10 - Other Financial Industry Activities and Affiliations

Heck Capital does not have a Broker Dealer or other financial industry affiliation.

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

Heck Capital has established a Code of Ethics applicable to all persons who have access to confidential client records or to recommendations being made for client accounts. Designed to prevent conflicts of interest between the financial interests of clients and the interests of the Firm's staff, the Code requires such "access persons" to obtain pre-approval of certain securities transactions, to report transactions quarterly and to report all securities positions in which they have a beneficial interest at least annually. All officers, directors and employees of the Firm are considered Access Persons. These reporting requirements allow supervisors at the Firm to determine whether to allow or prohibit certain employee securities purchases and sales based on transactions made, or anticipated to be made, in the same securities for client accounts. All client and employee trades are reviewed periodically to determine that employees are not receiving preferential treatment with regard to the timing of their transactions. If any employee security transaction appears inconsistent with the guidelines established, the Chief Compliance Officer (CCO) will review the trading pattern and determine what action(s) to take which may include placing trading restrictions on the account/employee. The Code also establishes certain bookkeeping requirements to conform with federal bookkeeping rules. The Code is required to be reviewed at least annually and updated as necessary. A complete copy of the Firm's Code is available upon request.

Heck Capital's Portfolio Managers may buy and sell the same securities they recommend to clients. To the extent such transactions, other than in mutual funds, which could adversely impact transactions contemplated for client accounts, client transactions are given priority. Documentation is kept on each transaction that occurs.

During the course of implementing a client's chosen investment strategy, errors may occur. Clients will not bear losses due to errors on the part of Heck Capital or its employees. Due to Heck Capital's monitoring of securities transactions for any inconsistencies, it is likely that errors will be identified and moved to the Firm's error account or in the event of a gain, can be accomplished in the client's account. Adjustments will be made accordingly depending on if a loss occurs (Heck Capital will pay back error to client).

When placing orders for client accounts, it should be noted that there are occasions when not all client orders will be in the same direction (buy or sell) for a particular security. For example, the Firm may be adding to a position for client accounts while at the same time, another client account may be selling the same security in order to raise cash for a withdrawal. In such a situation, the decision to sell was based on the client's desire to withdraw funds rather than a change in the Firm's outlook for the particular security. It may be advantageous in these circumstances to "cross" the order(s) of the client(s) buying the security with the order(s) of the client(s) selling the same security rather than subjecting the orders separately to the open market. This is particularly helpful in cases where the security is hard to find or has a very low trading volume. As such, clients should be aware that the Firm may engage in such cross trading in cases where the Firm determines that such an execution would be in the best interests of the clients involved. In such cases, there may be additional transactions charged by the custodian to clients. Please contact the Firm if you have any questions about this policy.

Trustee services may be provided through use of the services offered by a financial institution designated by a client, or may be coordinated with trust services that Heck Capital Advisors believes is most appropriate for the client's situation.

Typically, Heck Capital does not act in capacity of trustee. In the event Heck Capital Investment Executives elect to be a trustee, the scopes of services are negotiated in advance and may be limited by the Investment Executive's ability to provide services, or by applicable law. In all cases, when trustee services are recommended, clients enter into a separate trust agreement with the institution of their choice or Fidelity Personal Trust Company FSB setting the terms of the engagement.

When a Heck Capital Investment Executive recommends trustee services in the advice the Executive provides, a conflict of interest exists because Heck Capital acting as Investment Advisor may receive compensation if the advice

to acquire trustee services is followed. Clients are encouraged to obtain legal counsel to assist in obtaining the trust services being offered.

When Heck Capital make recommendations relating to whether a client should roll over their existing retirement plan account into an IRA, or whether a client should transfer their IRA from another firm to our firm, we face a conflict of interest. When Heck Capital recommends that a client roll over their account into an account managed by our firm, we may receive a higher level of compensation than we would if the client did not roll over that account. Furthermore, by rolling over an account into an account managed by our firm, the client may bear higher costs than they are bearing with their existing retirement plan or than they would bear if their account were held with another firm.

Item #12 - Brokerage Practices

With respect to Investment Consulting, Financial Planning and Retirement Plan Consulting Services, Heck Capital does not engage in brokerage practices, including directed brokerage policies, and does not accept soft dollars. Heck Capital may place or assist in placing orders authorized by Clients through various custodians Heck Capital has an obligation to execute securities transactions so that quality execution prices are obtained, and that the total costs provide the most favorable broker-dealer services received in terms of research, execution capability, commission rates, financial responsibility and responsiveness to the money manager. Heck Capital will aggregate, also called “bunching” or “blocking” trades to help the adviser fulfill its duty to obtain best price and execution for all clients.

Item #13 - Review of Accounts

Heck Capital monitors the individual investments within the Consulting, Financial Planning and Retirement Plan Consulting Services Programs. Heck Capital offers clients a portfolio review at least annually, and on an as needed basis, or by request of client. However, the frequency is also dependent on the investment procedures indicated for each client, market trends, the manager’s discretion, events and news materially affecting a security, and other factors.

Financial Plans are offered to clients on an as needed basis requested by clients. The account reviews are performed by Heck Capital’s Investment Advisors. Designated personnel from Heck Capital, such as Portfolio Managers and Investment Advisors are primarily responsible for review of transactions and positions.

Reports

The custodian makes available to clients at least quarterly custodial reports prepared and delivered by the Custodian and typically monthly. Other written reports may be furnished to the Client based on individual needs. Clients may also receive performance reports from Heck Capital, as agreed upon by Heck Capital and Client. Clients are encouraged to compare the information on any performance statement received from Heck Capital to that shown on custodial statements. Please also note that the account custodian does not verify the accuracy of the advisory fee calculation.

Item #14 - Client Referrals and Other Compensation

Heck Capital may also enter into new client procurement agreements with firms or individuals qualified to solicit client relationships for Heck Capital. Such agreements call for the relationship of Heck Capital and the client solicitor to be fully disclosed to the client, including the remuneration to be paid to the solicitor by Heck Capital, before management services begin. When such arrangements exist, the fee charged to a client for services is not raised. All clients procured by solicitor will be given full written disclosures describing the terms and fee arrangements between the advisor and the solicitor prior to or at the time of entering into the advisory agreement. The Client procurement agreement shall be signed by Client and Heck Capital. If solicitor provides trading authority, Heck Capital shall monitor and document trading procedures. Solicitor arrangements may include Accountants, Legal Firms, and/or individual/entities. Heck Capital may also enter into request for information for due diligence on firms that Heck Capital may utilize for referrals.

Heck Capital Advisors participates in the Fidelity Wealth Advisor Solutions® Program (the "WAS Program"), through which Heck Capital Advisors receives referrals from Strategic Advisers LLC (Strategic Advisers), a registered investment adviser and Fidelity Investments company. Heck Capital Advisors is independent and not affiliated with Strategic Advisers or any Fidelity Investments company. Strategic Advisers does not supervise or control Heck Capital Advisors, and Strategic Advisers has no responsibility or oversight for Heck Capital Advisors' provision of investment management or other advisory services.

Under the WAS Program, Strategic Advisers acts as a solicitor for Heck Capital Advisors, and Heck Capital Advisors pays referral fees to Strategic Advisers for each referral received based on Heck Capital Advisors' assets under management attributable to each client referred by Strategic Advisers or members of each client's household. The WAS Program is designed to help investors find an independent investment advisor, and any referral from Strategic Advisers to Heck Capital Advisors does not constitute a recommendation by Strategic Advisers of Heck Capital Advisors' particular investment management services or strategies. More specifically, Heck Capital Advisors pays the following amounts to Strategic Advisers for referrals: the sum of (i) an annual percentage of 0.10% of any and all assets in client accounts where such assets are identified as "fixed income" assets by Strategic Advisers and (ii) an annual percentage of 0.25% of all other assets held in client accounts. In addition, Heck Capital Advisors has agreed to pay Strategic Advisers an annual program fee of \$50,000 to participate in the WAS Program. These referral fees are paid by Heck Capital Advisors, may be subject to negotiation, and are not paid by the client.

To receive referrals from the WAS Program, Heck Capital Advisors must meet certain minimum participation criteria, but Advisor has been selected for participation in the WAS Program as a result of its other business relationships with Strategic Advisers and its affiliates, including Fidelity Brokerage Services, LLC ("FBS"). As a result of its participation in the WAS Program, Heck Capital Advisors has a conflict of interest with respect to its decision to use certain affiliates of Strategic Advisers, including FBS, for execution, custody and clearing for certain client accounts, and Advisor could have an incentive to suggest the use of FBS and its affiliates to its advisory clients, whether or not those clients were referred to Heck Capital Advisors as part of the WAS Program.

Under an agreement with Strategic Advisers, Heck Capital Advisors has agreed that Advisor will not charge clients more than the standard range of advisory fees disclosed in its Form ADV 2A Brochure to cover solicitation fees paid to Strategic Advisers as part of the WAS Program. Pursuant to these arrangements, Heck Capital Advisors has agreed not to solicit clients to transfer their brokerage accounts from affiliates of Strategic Advisers or establish brokerage accounts at other custodians for referred clients other than when Heck Capital Advisors' fiduciary duties would so require, and Advisor has agreed to pay Strategic Advisers a one-time fee equal to 0.75% of the assets in a client account that is transferred from Strategic Advisers' affiliates to another custodian; therefore, Heck Capital Advisors has an incentive to suggest that referred clients and their household members maintain custody of their accounts with affiliates of Strategic Advisers. However, participation in the WAS Program does not limit Heck Capital Advisors' duty to select brokers on the basis of best execution. On occasion, the Firm may conduct various due diligence visits to certain investment/mutual fund companies. The expenses for the due diligence visit may be covered by these companies. This may provide a potential conflict of interest, thus Heck Capital and its CCO monitor all due diligence meetings for their relevance towards the Firm's investment process, and visits are pre-approved according to this process.

Item #15 - Custody

Heck Capital does not take physical custody over Client's cash or securities. However, the Firm is deemed to have custody in certain situations under guidance issued by the SEC. Specifically, pursuant to the Investment Advisers Act of 1940, the Firm is deemed to have "constructive custody" of Client funds because we have the authority and ability to debit our fees directly from the accounts of those Clients receiving our services. Additionally, certain Clients have, and could in the future, sign a Standing Letter of Authorization ("SLOA") that gives us the authority to transfer funds to a third-party as directed by the Client in the SLOA. This is also deemed to give us custody. Custody is

defined as any legal or actual ability by the firm to withdraw client funds or securities. Firms with deemed custody must take the following steps:

1. Ensure clients' managed assets are maintained by a qualified custodian;
2. Have a reasonable belief, after due inquiry, that the qualified custodian will deliver an account statement directly to the client at least quarterly;
3. Confirm that account statements from the custodian contain all transactions that took place in the client's account during the period covered and reflect the deduction of advisory fees; and
4. Obtain a surprise audit by an independent accountant on the clients' accounts for which the advisory firm is deemed to have custody.

However, the rules governing the direct debit of client fees and SLOAs exempts us from the surprise audit rules if certain conditions (in addition to steps 1 through 3 above) are met. Those conditions are as follows:

1. When debiting fees from client accounts, we must receive written authorization from clients permitting advisory fees to be deducted from the client's account.
2. In the case of SLOAs, we must: (i) confirm that the name and address of the third party is included in the SLOA, (ii) document that the third-party receiving the transfer is not related to our firm, and (ii) ensure that certain requirements are being performed by the qualified custodian.

The qualified custodian that is selected by a client maintains actual physical custody of client assets. Client account statements from custodians will be sent directly to each client to the email or postal mailing address that is provided to the qualified custodian selected by the client. Clients are encouraged to compare information provided in reports or statements received by our firm with the account statements received from their custodian for accuracy. In addition, clients should understand that it is their responsibility, not the custodian's, to ensure that the fee calculation is correct.

If client funds or securities are inadvertently received by our firm, they will be returned to the sender immediately, or as soon as practical.

We encourage our clients to raise any questions with us about the custody, safety or security of their assets. The custodians we do business with will send Clients independent account statements listing your account balance(s), transaction history and any fee debits or other fees taken out of your account.

Item #16 - Investment Discretion

Heck Capital shall invest with discretionary authority hereby granted by Client, the securities, cash and/or other assets held in Client's account ("Account") through the Account's custodian ("Custodian"). Investments may be made in securities of any kind, including but not limited to, mutual funds, money market funds, CD's, exchange traded funds, stocks, bonds, commodity related securities, options, leveraged securities, inverse funds and other securities. Services may also include the hiring and termination of third-party portfolio managers ("Third Party Portfolio Manager") as Heck Capital deems appropriate. Such Third Party Portfolio Managers are also granted discretionary authority by Client to purchase and sell investments in the same scope granted to Heck Capital under this Agreement.

With respect to Investment Consulting, Financial Planning and Retirement Plan Consulting Services, Heck Capital does not engage in investment discretion. Clients make all decisions in use of brokerage accounts and selection of transactions.

Item #17 - Voting Client Securities

For each client receiving discretionary and non-discretionary management services, Heck Capital will vote proxies in a manner designed to maximize the value of client investments. With respect to Investment Consulting, Financial

Planning and Retirement Plan Consulting Services; Heck Capital generally does not vote proxies unless directed by client.

Item #18 - Financial Information

Heck Capital does not have any financial condition that is likely to impair its ability to meet its contracted commitment to any client.

Item #19 - Request for State-Registered Advisors

The disclosure required by item 19 is not applicable.



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heckcapitaladvisors.com

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Part 2A Appendix 1 of Form ADV Wrap Fee Program Brochure

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(03/2026)

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This wrap fee program brochure provides information about the qualifications and business practices of Heck Capital Advisors, LLC ("Heck Capital" or the "Firm"). If you have any questions about the contents of this brochure, please contact us at (715) 361-1500 or heckcapital@heckcapital.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Heck Capital Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

Item #2 - Material Changes Since Last Annual Update

No material changes have been made.

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Item #4 - Services, Fees and Compensation

Heck Capital Advisors, LLC ("Heck Capital" or the "Firm") is a SEC Registered Investment Advisor and is a Wisconsin Limited Liability Company. The Firm offers investment advisory services, including discretionary and continuous non-discretionary advisory services. A description of these management service programs is set forth below. The Firm's other investment advisory services include Investment Consulting, Financial Planning, and Retirement Plan Consulting Services to its clients. A description of these management services is listed in Form ADV 2A. The discretionary and non-discretionary services are incorporated in a wrap fee, thus the advisor fees, portfolio management fees, transactions, and related investment services are implemented in the wrap fee. Heck Capital receives compensation as a result from its recommendation to participate in the wrap program. On the other hand, the Consulting, Financial Planning and Retirement Planning services is incorporated in a separate fee. Heck Capital

has been providing investment advisory services since May of 2007; however, the Principal(s) have been providing investment advisory services for over 35 years.

Discretionary / Non-Discretionary Management Services

To commence discretionary investment management services, Heck Capital may recommend clients open an account at custodians preferred by Heck Capital. In addition, Heck Capital can offer discretionary investment management services at other custodian firms. Heck Capital is not affiliated in any way with the custodian. Such preferred custodians may be brokerage firms which process transactions for Client's accounts. Neither Heck Capital nor the Advisors of Heck Capital share in transaction commissions charged by the custodians nor does the Firm share in any revenue from any mutual fund company. The preferred custodian is Fidelity Investments. Heck Capital does not engage in brokerage practices however may place or assist in placing orders authorized by Clients through various custodians and based on Client's objectives. For non-discretionary investment management services, Heck Capital may recommend and/or utilize multiple custodians or platforms.

After the Account is opened, a Heck Capital Portfolio Manager or Advisor will monitor the investments in the Account and purchase and sell securities in the account as the Portfolio Manager or Advisor deems necessary to be consistent with the client's investment objectives. Most Accounts are discretionary accounts. This means that Heck Capital's Portfolio Manager or Advisor will not contact a client before placing an order to purchase or sell securities because the client grants Heck Capital authority in advance to place orders. Securities of all types may be purchased or sold, including but not limited to stocks, bonds, mutual funds, exchange traded funds, options, commodity-related securities, leveraged securities, inverse funds, CD's and money market funds. However, Heck Capital generally does not utilize leveraged securities, inverse funds, or options in most portfolios. Investment Management Services include, but are not limited to: Discretionary - Heck Capital provides Discretionary selection and investing of client's accounts; Non-Discretionary - Heck Capital will use its judgment in providing advice and investment options however, client understands that Heck Capital is not responsible for decisions made independently by the client regarding the investment transactions; Client Directed – Heck Capital agrees to provide general advice and Heck Capital is not responsible with respect to client's selection, holding, and/or liquidation of the underlying securities. Clients acknowledge that Heck Capital is not assuming any investment responsibility and agrees to indemnify and hold harmless Heck Capital for any loss or damage resulting from client or any other party purchasing, retaining, or selling any securities in a client directed account. Client also acknowledges that Heck Capital does not guarantee the results of its services and that loss can occur from receiving various investment management services.

Heck Capital may include digital assets as part of your investment portfolio to diversify holdings and potentially enhance returns. However, digital assets are speculative investments and may not be suitable for all clients. The inclusion of digital assets in your portfolio will be based on your investment objectives, risk tolerance, financial situation, and overall portfolio strategy. For the purpose of this disclosure, "Digital Assets" refers to any digital representation of value that can be digitally traded or transferred. This includes but is not limited to cryptocurrencies (eg. Bitcoin, Ethereum).

Heck Capital may also include private markets investments as part of your portfolio to diversify holdings and potentially enhance returns. However, private markets are a speculative and illiquid investment, and may not be suitable for all clients. The inclusion of private markets in your portfolio will be based on your investment objectives, risk tolerance, financial situation, and overall portfolio strategy. Private markets investments operate in a complex regulatory environment. These investments are generally subject to less regulation than publicly traded securities, which can result in higher risks. It is important to stay informed about regulatory developments that may affect your investments.

In addition, Heck Capital has the authority to secure the services of Third-Party Portfolio Managers ("Third Party Portfolio Managers") and to terminate the services of Third-Party Portfolio Managers, if Heck Capital believes it is in the best interests of a client to do so. Heck Capital may or may not enter into arrangements with Third Party Portfolio Managers using its discretionary authority. If Heck Capital does not enter into such an arrangement, it will recommend a Third-Party Portfolio Manager to a client where it believes appropriate.

Situations in which Heck Capital expects to recommend such managers typically include direct indexing. Direct indexing is an investing style which involves buying individual stocks that make up an index (or a model) in similar proportions as the index. Direct indexing offers several advantages over owning an index mutual fund or an index exchange-traded fund (index ETF), including greater flexibility and tax efficiencies. Third Party Portfolio Manager direct indexing options includes both long-only strategies (single asset and multi-asset) and a long-short strategy. Through the use of leverage, the long-short strategy seeks to accelerate tax-loss harvesting and therefore enhance after-tax returns on a deferral basis. This strategy may have higher account minimums, require an account to be margin-enabled, and is associated with additional risks that may lead to loss. Such risks include, but are not limited to:

- Market risk can lead to loss due to the impact of general market movements.
- Idiosyncratic risk, due to company-specific factors that are generally not correlated with the broad market environment can lead to loss.
- Short-sale risk can amplify losses if the stock price appreciates.
- Borrow risk can result in a "short squeeze," meaning that securities borrowed with a short sale need to be returned to the securities lender on short notice and at a time when other short sellers of the security are receiving similar requests, compelling the end client to buy such securities on the open market at prices significantly in excess of the proceeds received, which can lead to loss;
- Leverage risk can cause unexpected interactions between longs and shorts or an improperly hedged portfolio, and/or
- Borrow rate risk for stocks that are thinly traded or less available for other reasons can lead to loss.

Advisor has informed such a Client that the tax treatment of the long/short strategies may constitute a deferral rather than a permanent savings, cannot be guaranteed, and may or may not be suitable for such Client to pursue, and that neither the Advisor nor the Subadvisor can offer tax advice, and Advisor has counseled each client to consult with their own qualified tax advisors with respect to the suitability and likely tax treatment of the long/short strategy in their particular circumstances.

Heck Capital also expects to recommend Third Party Portfolio Managers for some ERISA-based accounts for specific asset classes. When a client chooses to use the services of a Third-Party Portfolio Manager, it will incur additional asset-based fees that are separate from and in addition to the fees charged by Heck Capital for its advisory services. Heck Capital does not utilize Third Party Portfolio Managers as a matter of general practice. Heck Capital does, however, have monitoring and management capabilities in connection with 401(k) and/or 529 plan accounts, as authorized.

Meetings with clients are held at the request of the client or at the request of the client's Heck Capital Investment Advisor. Also, a client is free to contact his or her Investment Advisor at any time should the client have any questions.

It is important that a client immediately inform the client's Heck Capital Investment Advisor of any change in the client's investment objectives, reasonable restrictions, or financial circumstances since advice and selection of investments are based upon such information. Reports are provided to each client at least quarterly by the Custodian. Clients may impose restrictions on certain securities via the Heck Capital Investment Policy Statement.

Client understands that when providing services under this Agreement, Heck Capital acts only as an investment adviser and not in the capacity of a broker, dealer or underwriter as those terms are defined in the Securities Exchange Act of 1934 and the Securities Act of 1933.

Sub-advisory Services: Heck Capital may also provide continuous management services including advice and/or discretion to purchase and sell securities in amount and at the times Heck Capital believes it is appropriate. In some of these instances, if an account is referred by another advisory firm, this 'Advisory Firm' may be providing the following services rather than as specified in your agreement with Heck Capital: (a) Advisory Firm will assist

you in opening your Account at the custodian you select. (b) Advisory Firm will arrange for the custodian to maintain custody of all Account assets and perform custodial functions typical of a custodian. (c) You agree to communicate all of your financial needs and goals candidly with Advisory Firm and to keep Advisory Firm informed of any changes in your financial situation, needs, goals and Heck Capital investments styles you wish Heck Capital to follow while managing your Account. Advisory Firm will communicate that information to Heck Capital. (d) Heck Capital fees may be paid directly by Advisory Firm from the fees Advisory Firm collects from you for services. (e) Meetings and conferences regarding the performance of your Account will be held between you and Advisory Firm. (f) Reports relating to the investments in your Account, transactions for your Account and the performance of the Account will be provided to you by Advisory Firm. Heck Capital will assist Advisory Firm in performing the above-described duties as requested by Advisory Firm.

As of 12/31/2025 Heck Capital managed approximately \$5 billion in assets on a discretionary basis and advised on approximately \$6.3 billion in assets on a non-discretionary-consulting basis. Heck Capital also has assets under advisement (AUA) of approximately \$1.3 billion which includes non-discretionary consulting and/or non-continuous advisory services.

Discretionary / Non-Discretionary Management Fees

The fees for discretionary management services are based on an annual percentage of assets subject to management services. Fees for non-discretionary services are also asset-based or a flat fee, and negotiated on a client-by-client basis. The fees cover various custody and most transaction costs in addition to Heck Capital's management fees. Portfolio Management Styles that are in a Breakpoint Group will typically be househanded for reduced/tiered fees. Clients that are in a group incorporating various investment styles may be billed according to the fee schedule and breakpoints that apply. The fee does not include the following: (a) charges for services provided by Heck Capital, its affiliates or third parties which are outside the scope of the services agreement (e.g., retirement plan administration fees, trustee fees, wire transfer fees, etc.); (b) taxes for fees imposed by exchanges or regulatory bodies; (c) mark-ups and mark-downs on principal trades or transaction charges on cross trades from the custodian; (d) brokerage commissions and other fees and charges imposed because the client, Heck Capital or a Third-Party Portfolio Manager chooses to effect securities transactions for the account with or through a broker-dealer other than the preferred custodian; and (e) internal operating expenses on mutual funds and exchange traded funds. Certain mutual funds may also have short-term redemption or trading charges. There are various reasons why certain mutual fund share classes will be selected for investment by Heck Capital, including a fund's no-load expense ratio, short term redemption fee, trading costs, tenure of share classes available, and liquidity. Therefore, Heck Capital may invest in higher operating expense share classes for the aforementioned reasons. The lower share class funds may be utilized in Heck Capital's total return wrap programs and/or diversified equity institutional styles. Typically, the asset allocation programs may incorporate more cash needs, income needs, and overall trading; therefore, the higher operating expense share class may be utilized to lower trading costs. The overall decision to invest in a certain share class is respective of Heck Capital's conviction in the mutual fund strategy. Clients should understand that Heck Capital will be generally purchasing shares of no-load registered investment companies (e.g. mutual funds, closed-end funds, exchange-traded funds, etc.) for certain investment strategies which in some cases may comprise a significant amount of the client's portfolio. In these situations, clients are advised that if they did not utilize Heck Capital as their investment advisor they would (in most cases) be able to purchase these same securities paying only those fees charged by the fund and/or broker for the transaction and not Heck Capital's advisory fee, but these fees may differ according to the specific fund share class' accessibility. In addition, any commissions charged for transactions occurring after termination of the services agreement are the obligation of the client. Each of these additional charges are separately charged to the client's account or reflected in the price paid or received for a given security.

Heck Capital's advisory fees are negotiable but do not exceed 1.00%. Fees are based on several factors, including the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Fees charged are generally negotiated directly by the advisor and client and discounts or specific agreements may be reached to address specific client situations. Different clients receiving

similar services may pay different fees for a variety of reasons, including complexities associated with individual situations.

Negotiated fees may differ from client-to-client based upon a number of factors, including, but not limited to, the type and size of the Account, the historical and/or expected size or number of trades for the Account, and the number and range of supplemental advisory and client related services to be provided to the client. Negotiated fees may also depend on the personalization of the account, securities invested, client objectives, and composition of the portfolio. Any outlier fee arrangements whereby Heck Capital provides personalized investment monitoring, trading, and/or investment programs that are not in the specific styles or groups may be charged a separate fee. This negotiated fee shall meet business rationale and is discussed with the Client versus the breakpoint fee or flat fee at account opening. Moreover, fee minimums and account minimums may vary as a result of the application of prior schedules depending upon the Account inception date. Minimum Account sizes may also be waived under certain circumstances.

Fees are billed quarterly, in advance, based on the value of assets under management and/or fee schedule determined as of the end of the previous quarter. The quarterly fee is one quarter of the annual amount in the following schedule or a pro-rata share of the quarter for a partial period. The initial fee is calculated from the opening date through the last day of that calendar quarter and is pro-rated accordingly. Additional assets received into the Account may be charged a pro-rata fee based on the number of days remaining in the quarterly billing period. No adjustments will be made to the fee for appreciation or depreciation in the market value of securities held in the Account, or with respect to partial withdrawals by a client other than at the discretion of Heck Capital, during any quarterly billing period for which such fee is charged. The values of related accounts may be combined for fee calculation purposes. In the event the services agreement is terminated by either party prior to the end of a billing period, a pro-rata refund of the fee is made with the exception of accounts being combined and or re-registered and where there is no disruption of management. The client's Account is debited for all fees due per the client's authorization in writing in advance. Heck Capital has the right to amend its fee schedule upon 15 days written notice to the client. When Heck Capital acts in a sub-manager capacity, fees may be debited monthly or quarterly.

Fees for monitoring and management of 401(k) and/or 529 plan accounts may be charged a percentage of assets under management, or an annual fixed fee, payable quarterly in advance. Fees may be deducted from Client's account as authorized above or receive an invoice which is due upon receipt. Confirmation will be sent to Client for fee notification regarding monitoring and/or management of 401(k) and/or 529 plan accounts.

Considerations

Heck Capital's fees may be more or less than those charged by Heck Capital to another client for similar services, and by other advisers for similar services. Also, Heck Capital's "wrap" fee for services, i.e., the fee covering both advisory services and transaction commissions, may be more or less than purchasing advisory and transaction brokerage services separately. The factors that bear upon the cost of services are the size of the account, and whether trades are placed through a brokerage firm other than the preferred custodian resulting in per trade commissions being charged to the account.

In the event that exchange-traded funds or other mutual funds are part of a client's portfolio, the mutual funds charge additional and separate internal fees as described in the fund's prospectus. Thus, when these funds are in a client's account, two advisory fees are imposed: one internally by the fund, the other by Heck Capital. Heck Capital typically absorbs transaction costs on its Discretionary Portfolio Management strategies and Non-Discretionary Consulting strategies and thus the frequency of trades could be a consideration while managing the portfolios.

Not all transaction-related expenses are covered by the "wrap" fee schedule shown above. Mark-ups and mark-downs, certain account charges, commissions, short-term redemption costs, and costs for transactions not placed through the preferred custodian and for transactions occurring after termination of Heck Capital's services agreement are not covered.

Heck Capital does not guarantee the results of 1) investment management or consulting advice it gives, including the performance of its investment styles, or 2) the advice given and actions taken by Third-Party Portfolio Managers or Mutual Funds. Thus, losses can occur by using Heck Capital's services.

Item #5 - Account Requirements and Types of Clients

Heck Capital provides advice to individuals, pension and profit-sharing trusts, foundations, corporations and other institutions. The Firm may also provide consulting services to partnerships and other types of entities. Heck Capital may at times provide its investment advice to institutions wishing to have the investments in their client accounts evaluated. For related financial planning advice, Heck Capital relies on instructions by client through statements, records, and various client information. Besides providing services to individuals, savings institutions, pension and profit-sharing plans, endowments and foundations, trusts, estates and business entities, Heck Capital is available to provide advisory services to broker-dealers and other investment advisors. There is typically a minimum household account size to receive investment management services of \$1,000,000. This minimum is negotiable and may be waived at the discretion of Heck Capital.

Item #6 - Portfolio Manager Selection and Evaluation

Heck Capital acts as a Portfolio Manager for discretionary investment services. Heck Capital is the sole Portfolio Manager in the wrap program.

Heck Capital Advisors manages discretionary investment accounts within three primary programs:

1. Asset Allocation
2. Equity & Fixed Income Securities
3. Indexing

Within the three programs, there are several investment styles with multiple combinations to allow clients to diversify or concentrate investments along the risk/return spectrum of their choice.

Quantitative and qualitative criteria are considered for various security selections. The Portfolio Managers incorporate a macro (top down) and micro (bottom up) factor analysis. This analysis includes economic, fiscal policy, interest rates and political overviews in combination with asset class, sector, industry, company, and peer group comparisons. In addition, the Portfolio Managers utilize fundamental and technical analysis, along with strategic and tactical asset allocation weightings. There are various risks associated with investing, specifically, with fundamental analysis, it may be noted that the value of a company may fall based on market factors even if technical analysis does not occur.

The Heck Capital Portfolio Managers incorporate a top-down macro analysis and a bottoms-up quantitative / qualitative strategy to screen thousands of mutual funds, equities, and fixed income securities.

Fundamental and/or Technical Research in combination with one or all Macro / Micro indicators leads to Portfolio Composition. Heck Capital Portfolio Managers' investment decisions are based on independent research analysis.

Heck Capital Advisors LLC has engaged an independent CPA firm, to examine the Discretionary Investment styles on a quarterly basis. The examination is conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence supporting the Schedules and performing such other procedures as considered necessary in the circumstances.

Performance-Based Fees and Side-By-Side Management

Heck Capital does not charge performance-based fees. All fees are disclosed in Item #4.

Methods of Analysis, Investment Strategies, and Risk of Loss

Heck Capital Portfolio Managers may use a combination of both fundamental analysis and technical strategies. Heck Capital Portfolio Managers carefully evaluate the performance histories of funds and other securities, when evaluating client investments and executing purchases and sales in styles based upon the results of their analysis.

Sources of Information

When providing counseling services, Heck Capital Portfolio Managers and Advisors rely upon general securities and market knowledge, published investment strategies and general sources of securities and market information. Heck Capital also may pay third party firms to provide advice about specific strategies and transactions to use. Prior to applying such information, it makes a judgment about whether doing so is suitable for the Client.

Investment Strategies

When counseling a client or preparing financial plans for clients, Heck Capital makes recommendations relating to various investment asset types it believes will meet a client's needs. Investment strategies which the client chooses to utilize in the implementation of such plans could take virtually any form, depending upon the client's particular circumstances and the asset type involved.

Risk of Loss

Risk of loss is inherent with every investment choice. Although research has consistently demonstrated that risk is best reduced through diversification of assets, a diversified portfolio with more aggressive investments will experience greater volatility than a less aggressive portfolio, especially over the short-term.

If clients have an extremely short investment horizon, or are risk averse, a more conservative portfolio may be more appropriate. However, if clients have a longer time horizon and are willing to tolerate principal fluctuations due to market volatility, a more aggressive portfolio may be appropriate. Therefore, the level of risk assumed with investments will vary depending on the investment time frame, objectives and volatility.

Please review risk tolerance levels per investment style/portfolio in the Heck Capital Investment Policy Statement and discuss them with a Heck Capital Representative. Should your objective(s) change for any portfolio, please notify a Heck Capital Representative immediately. All investment and economic markets go through cycles. Thus, there will be periods of time when certain asset classes outperform other asset classes. Although Heck Capital Representatives and Portfolio Managers will use their best professional judgment when giving advice, there is no way to guarantee the results of any recommendation or that loss will not occur. It is important to realize that at any point in time, client's investment portfolios may be worth more or less than the original amount invested.

Cybersecurity Risk: The computer systems, networks, and devices used by Heck Capital and its service providers employ a variety of protections designed to protect damage or interruption from computer viruses, network and computer failures, and cyber-attacks. Despite such protections, systems, networks and devices potentially can be breached. Cyber-attacks include, but are not limited to, gaining unauthorized access to digital systems for purposes of corrupting data, or causing operational disruption, as well as denial-of-service attacks on websites. Cyber incidents may cause disruptions and impact business operations, potentially resulting in financial losses, the inability of Heck Capital or service providers to trade, violations of privacy and other laws, regulatory fines, reputational damage, reimbursement costs, and additional compliance costs, as well as the inadvertent release of confidential information.

Withdrawal of Money

Clients are free to withdraw money from their portfolio at any time. However, because the sale of investments is often necessary to satisfy a withdrawal request, there may be tax consequences or penalties for these

withdrawals. When clients need to make withdrawals, we encourage discussing the time frame needed to access the money so that we can provide adequate time for appropriate selling of securities and distributions.

Investment Objective / Risk

The account objectives and styles will direct how each portfolio will be managed. Clients may change portfolio objectives via written instructions to Heck Capital. Please consult your Advisor for assistance. For consulting relationships, the client will indicate the most appropriate risk objective for asset allocation weightings.

Voting Client Securities

The following information summarizes Heck Capital Advisors, LLC's policy and procedures regarding how the Firm votes proxies for clients receiving management services. Heck Capital will vote proxies if so authorized by Client.

Guiding Principles

Heck Capital's policies and procedures relating to voting proxies are designed to ensure that proxies are voted in the best interests of clients. The policies and procedures do not apply to those situations where the client has retained voting discretion. The Firm will provide voting advice only when specifically requested.

Primary Objective

In general, proxies will be voted in a manner designed to maximize the value of client investments. In evaluating a particular proxy proposal, the Firm takes into consideration, among other things, the period of time over which the voting shares of the company are expected to be held, the size of the position, the costs involved in the proxy proposal and the existing governance documents of the affected company, as well as its management and operations. Generally, it is the Firm's policy to vote in accordance with management's recommendations on most issues since the capability of management may be one of the criteria used by the Firm in selecting investments. Proxy proposals that change the existing status of a company will be reviewed to evaluate the desirability of the change, and to determine the benefits to the company and its shareholders, but the Firm's primary objective is always to protect and enhance the economic interests of its clients.

Exceptions

When the Firm believes management is acting on its own behalf, instead of on behalf of the well-being of the company and its shareholders, or when the Firm believes that management is acting in a manner that is adverse to the rights of the company's shareholders, the Firm will take steps to represent the interests of its clients and, as a result, may elect to vote against management's recommendations. Examples of such activity include (i) attempts by management to insulate itself from accountability to shareholders or otherwise entrench itself; and (ii) proposals that have the effect of deterring potential interests in an acquisition or similar corporate transaction at a fair price, which proposals the Firm believes might have a negative impact on the value of the company or might otherwise be detrimental to company shareholders.

The Firm generally favors cumulative voting for directors. In situations where the Firm is extremely displeased with management's performance, it may withhold votes or vote against management's slate of directors and other management proposals as a means of communicating its dissatisfaction. This occasion most often develops when the Firm believes that management has displayed a consistent inability or lack of interest in moving the company toward achieving its potential and that a message needs to be sent that the company's shareholders are not satisfied with the status quo. The Firm may review proposals relating to management and director compensation in light of the company's performance and corporate governance practices. The Firm normally will vote against significant compensation increases or compensation not tied to company performance in instances where it believes the company is under performing and/or management has not added value to the company.

Other Factors the Firm Considers

The Firm recognizes that the activity or inactivity of a company with respect to matters of social, political or environmental concern may have an effect upon the economic success of the company and the value of its securities. However, the Firm does not consider it appropriate, or in the interests of its clients, to impose its own

moral standards on others. Therefore, it normally supports management's position on matters of social, political or environmental concern, except where it believes that a different position would be in the economic interests of company shareholders.

Conflicts

In evaluating a proxy proposal, the Firm's Chief Compliance Officer ("CCO") or any person designated by him (the "Designated Voter") is responsible for considering whether there are any circumstances that may give rise to a conflict of interest on the part of the Firm in connection with voting client proxies either because of a business relationship between the Firm and the company or otherwise. If the CCO believes that a potential conflict of interest exists, the CCO must vote in a manner which favors the client's interest and should, if necessary, consult with the Firm's legal counsel. If necessary, the vote should be referred to the client, or another fiduciary of the client.

Records

Appropriate records are prepared and maintained relating to receipt of proxies and how and when voted. A complete copy of Heck Capital's Proxy Voting Policies and procedures is available upon request. To obtain specific voting information on any of the proxies voted on your behalf, please contact Heck Capital.

Item #7 - Client Information Provided to Portfolio Managers

Since Heck Capital acts as the Portfolio Manager, all client information is communicated to the Firm. Heck Capital is the sole Portfolio Manager for discretionary Clients.

Item #8 - Client Contact with Portfolio Managers

There are no restrictions in place on clients' ability to contact and consult with the Heck Capital Portfolio Managers. However, clients are strongly encouraged to work with their respective Advisor from Heck Capital for all related questions.

Item #9 - Additional Information

Disciplinary Information

Heck Capital does not have any material disciplinary information to report.

Other Financial Industry Activities and Affiliations

Heck Capital does not have a Broker Dealer affiliation or other financial industry affiliation.

For Heck Capital's wrap fee services, Heck Capital utilizes Fidelity Investments as its primary custodian. Heck Capital has an arrangement with National Financial Services LLC, and Fidelity Brokerage Services LLC (together with all affiliates, "Fidelity" "custodian") through which Fidelity provides platform services. The platform services include, among others, brokerage, custodial, administrative support, record keeping and related services that are intended to support in conducting business and in serving the best interests of their clients but that may benefit Heck Capital.

Custodian charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Custodian enables Heck Capital to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Custodial commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Custodian may be higher or lower than those charged by other custodians and broker-dealers.

As a result of receiving such services, Heck Capital may have an incentive to continue to use or expand the use of Custodian's services. Heck Capital examined this potential conflict of interest when it chose to enter into the relationship with Custodian and has determined that the relationship is in the best interests of Heck Capital's clients and satisfies its client obligations, including its duty to seek best execution. A client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where Heck Capital determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including execution capability, commission rates, and responsiveness. Accordingly, although Heck Capital will seek competitive rates, to the benefit of all clients, it may not necessarily obtain the lowest possible commission rates for specific client account transactions. Heck Capital and Custodian are not affiliates, and no broker-dealer affiliated with Heck Capital is involved in the relationship between Registrant and Custodian. In addition, Heck Capital may utilize other custodians for discretionary services pending the client relationship and client's direction to use other custodians.

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

Heck Capital has established a Code of Ethics applicable to all persons who have access to confidential client records or to recommendations being made for client accounts. Designed to prevent conflicts of interest between the financial interests of clients and the interests of the Firm's staff, the Code requires such "access persons" to obtain pre-approval of certain securities transactions, to report transactions quarterly and to report all securities positions in which they have a beneficial interest at least annually. All officers, directors and employees of the Firm are considered Access Persons. These reporting requirements allow supervisors at the Firm to determine whether to allow or prohibit certain employee securities purchases and sales based on transactions made, or anticipated to be made, in the same securities for client accounts. If any employee security transaction appears inconsistent with the guidelines established, the CCO will review the trading pattern and determine what action(s) to take which may include placing trading restrictions on the account/employee. The Code also establishes certain bookkeeping requirements to comply with federal bookkeeping rules. The Code is required to be reviewed at least annually and updated as necessary. A complete copy of the Firm's Code is available upon request.

Heck Capital's Portfolio Managers may buy and sell the same securities they recommend to clients. To the extent such transactions, other than in mutual funds, which could adversely impact transactions contemplated for client Accounts, client transactions are given priority. Documentation is kept on each transaction that occurs.

During the course of implementing a client's chosen investment strategy, errors may occur. Clients will not bear losses due to errors on the part of Heck Capital or its employees. Due to Heck Capital's monitoring of securities transactions for any inconsistencies, it is likely that errors will be identified and moved to the Firm's error account or in the event of a gain, can be accomplished in the client's account. Adjustments will be made accordingly depending on if a loss occurs (Heck Capital will pay back error to client).

When placing orders for client accounts, it should be noted that there are occasions when not all client orders will be in the same direction (buy or sell) for a particular security. For example, the Firm may be adding to a position for client accounts while at the same time, another client account may be selling the same security in order to raise cash for a withdrawal. In such a situation, the decision to sell was based on the client's desire to withdraw funds rather than a change in the Firm's outlook for the particular security. It may be advantageous in these circumstances to "cross" the order(s) of the client(s) buying the security with the order(s) of the client(s) selling the same security rather than subjecting the orders separately to the open market. This is particularly helpful in cases where the security is hard to find or has a very low trading volume. As such, clients should be aware that the Firm may engage in such cross trading in cases where the Firm determines that such an execution would be in the best interests of the clients involved. In such cases, there may be additional transactions charged by the custodian to clients. Please contact the Firm if you have any questions about this policy. The Firm may also engage in bond reoffers. In such a situation, this decision will be based on the Client's need for liquidity.

The Firm may sell the security to the custodian and buy back the security for a different Client based on that Client's investment objectives. The firm may engage in a security reoffer if it is advantageous for both parties.

Trustee services may be provided through use of the services offered by a financial institution designated by a client or may be coordinated with trust services provided by Fidelity Personal Trust Company FSB. Fidelity provides trustee services on two levels: administrative or agent. When Fidelity is appointed as administrative corporate trustee, the Fidelity Personal Trust Company can assume all discretionary and non-discretionary administrative responsibilities, including distributions, custody, accounting and tax reporting while Heck Capital Investment Executives and Heck Capital retain investment management responsibilities.

When Fidelity Personal Trust Company acts as agent for trustee services, it assists a trustee, whether Heck Capital Investment Executives or a client, in administering the trust, by providing guidance on complex accounting, recordkeeping and tax reporting requirements. Also, a client may consider naming Fidelity Personal Trust Company as successor Trustee to step in at a future date.

In the event Heck Capital Investment Executives elect to be a trustee, the scopes of services are negotiated in advance and may be limited by the Investment Executive's ability to provide services, or by applicable law. In all cases, when trustee services are recommended, clients enter into a separate trust agreement with the institution of their choice. Personal Trust Company FSB setting the terms of the engagement.

When a Heck Capital Investment Executive recommends trustee services in the advice the Executive provides, a conflict of interest exists because Heck Capital acting as Investment Advisor may receive compensation if the advice to acquire trustee services is followed. Clients are encouraged to obtain legal counsel to assist in obtaining the trust services being offered.

Heck Capital provides non-discretionary services to a client whose Board of Directors and Officer includes a Principal of Heck Capital. For this reason, a potential conflict of interest and bias exists; however, Heck Capital adheres to the policy of treating all clients equally, disclosing all pertinent information to all Board Members, and services are provided by means of a fair and reasonable service agreement.

Review of Accounts

Heck Capital monitors the individual investments within the Portfolio Management Programs each day the market is open. Portfolio performance is reviewed. Heck Capital offers Portfolio Management Program clients a review meeting on an as needed basis, or by request of client. However, the frequency is also dependent on the investment procedures indicated for each client, market trends, the manager's discretion, events and news materially affecting a security, and other factors.

Financial Plans are offered to clients on an as needed basis requested by clients. The account reviews are performed by Heck Capital's Investment Advisors. Designated personnel from Heck Capital, such as Portfolio Managers and Investment Advisors are primarily responsible for review of transactions and positions.

Reports

The custodian makes available to clients at least quarterly custodial reports prepared and delivered by the Custodian. Other reports may be furnished to the client based on individual needs.

Client Referrals and Other Compensation

Heck Capital may also enter into new client procurement agreements with firms or individuals qualified to solicit client relationships for Heck Capital. Such agreements call for the relationship of Heck Capital and the client solicitor to be fully disclosed to the client, including the remuneration to be paid to the solicitor by Heck Capital, before management services begin. When such arrangements exist, the fee charged to a client for services is not raised. All clients procured by solicitor will be given full written disclosures describing the terms and fee arrangements between the advisor and the solicitor prior to or at the time of entering into the advisory

agreement. The Client procurement agreement shall be signed by Client and Heck Capital. If solicitor provides trading authority, Heck Capital shall monitor and document trading procedures. Solicitor arrangements may include Accountants, Legal Firms, and/or individual/entities. Heck Capital may also enter into request for information for due diligence on firms that Heck Capital may utilize for referrals.

Heck Capital participates in the Fidelity Wealth Advisor Solutions® Program (the "WAS Program"), through which Heck Capital receives referrals from Fidelity Personal and Workplace Advisors LLC (FPWA), a registered investment adviser and Fidelity Investments company. Heck Capital is independent and not affiliated with FPWA or any Fidelity Investments company. FPWA does not supervise or control Heck Capital, and FPWA has no responsibility or oversight for Heck Capital's provision of investment management or other advisory services.

Under the WAS Program, FPWA acts as a solicitor for Heck Capital, and Heck Capital pays referral fees to FPWA for each referral received based on Heck Capital's assets under management attributable to each client referred by FPWA or members of each client's household. The WAS Program is designed to help investors find an independent investment advisor, and any referral from FPWA to Heck Capital does not constitute a recommendation by FPWA of Heck Capital's particular investment management services or strategies. More specifically, Heck Capital pays the following amounts to FPWA for referrals: the sum of (i) an annual percentage of 0.10% of any and all assets in client accounts where such assets are identified as "fixed income" assets by FPWA and (ii) an annual percentage of 0.25% of all other assets held in client accounts. In addition, Heck Capital has agreed to pay FPWA an annual program fee of \$50,000 to participate in the WAS Program. These referral fees are paid by Heck Capital and not the client.

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

On occasion, the Firm may conduct various due diligence visits to certain investment/mutual fund companies. The expenses for the due diligence visit may be covered by these companies. This may provide a potential conflict of interest, thus Heck Capital and its CCO monitor all due diligence meetings for their relevance towards the Firm's investment process, and visits are pre-approved according to this process.

Financial Information

Heck Capital does not receive set fees in advance; thus, no financial statement is attached. Heck Capital does not have any financial condition that is reasonably likely to impair its ability to meet its contracted commitment to any client.



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