

Beck Bode, LLC

Firm Brochure - Form ADV Part 2A

3/31/2026

This brochure provides information about the qualifications and business practices of Beck Bode LLC. If you have any questions about the contents of this brochure, please contact us at (617) 209-2224 or by email at ben@beckbode.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 Beck Bode LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Beck Bode LLC's CRD number is: 282611.

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Registration as an investment adviser does not imply a certain level of skill or training.

Item 2: Material Changes

This item will be updated on an annual basis and will identify and discuss material changes that are made to the Brochure since our last annual update.

We will deliver to our clients a free annual updated Brochure that includes a summary of any material changes that are made to this and subsequent Brochures within 120 days of the close of our fiscal year.

Since our last filing amendment completed on March 31, 2025, we have made the following material changes to our ADV:

- Item 4: new services: accounting/tax services. Marketing practices has been updated to include new social media content.
- Item 5: fee disclosure update.

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Item 4: Advisory Business

A. Description of the Advisory Firm

Beck Bode LLC (hereinafter “Beck Bode”) is a Limited Liability Company organized in the State of Massachusetts. The firm was formed in February 2013, and the principal owners are Benjamin Willard Beck and James Allan Bode.

B. Types of Advisory Services

Portfolio Management Services

Beck Bode offers ongoing portfolio management services based on the individual goals, objectives, and time horizon of each client. Beck Bode creates a Goals Planning Statement or similar documentation for each client, which identifies the client’s current financial circumstances and long-term goals and then provides a plan to aid in the selection of a portfolio that matches each objective. Portfolio management services may include, but are not limited to, the following:

- Investment strategy
- Goals Planning Statement
- Asset allocation
- Asset selection
- Regular portfolio monitoring

Beck Bode evaluates the current investments of each client with respect to their long-term objectives and time horizon. Beck Bode will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Long-term objectives are documented in the Goals Planning Statement, which is executed with each client.

Beck Bode seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Beck Bode’s economic, investment or other financial interests. To meet its fiduciary obligations, Beck Bode attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Beck Bode’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Beck Bode’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

In connection with its portfolio management services, Beck Bode may publish educational content and general investment-related information through various communication channels, including social media. Certain content may be directed to specific audiences, such as athletes; however, such content is provided for general informational purposes only and does not constitute individualized investment advice. Engagement with such content does not create an advisory relationship, and portfolio management services are

provided solely pursuant to a written advisory agreement.

Subadviser Services

Beck Bode may also act as a subadviser to advisers unaffiliated with Beck Bode. These third-party advisers would outsource portfolio management services to Beck Bode. This relationship will be memorialized in a contract between Beck Bode and the third-party adviser.

Pension Consulting Services

Beck Bode offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- portfolio management
- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options
- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker-dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, and time horizon, of the plan and its participants.

Financial Planning

Financial plans and financial planning may include but are not limited to investment planning; life insurance; tax planning; retirement planning; college planning; and cash flow planning.

Services Limited to Specific Types of Investments

Beck Bode generally limits its investment advice to mutual funds, fixed income securities,¹ equities and ETFs, although Beck Bode primarily recommends their proprietary Growth and Income Growth strategies that consist of a mix of publicly-trading equities.

Accounting/Tax Preparation Services

¹ Fixed income securities are not actively managed but are typically liquidated when new clients transfer them as legacy positions.

Beck Bode offers tax planning services to clients on a case-by-case basis as part of its overall advisory services. Any such services are limited in scope and are intended to be ancillary to Beck Bode's primary investment advisory services. The Adviser does not prepare or file tax returns unless separately agreed in writing.

C. Client Tailored Services and Client Imposed Restrictions

Beck Bode will tailor a program for each individual client. This will include an interview session with the client to identify their specific needs and requirements as well as a Goals Planning Statement that will be executed by Beck Bode together with the client. Beck Bode will use a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Beck Bode recommends strategies and allocations that, in the firm's determination, best fit the client's long-term objectives as detailed in the client's Goals Planning Statement.

Clients may request restrictions in investing in certain holdings in accordance with their values or beliefs. Any and all restrictions would be followed on a "best-efforts" basis. However, if the firm determines that the restrictions prevent Beck Bode from properly servicing the client account, or if the restrictions would require Beck Bode to deviate materially from its standard suite of services, Beck Bode reserves the right to end the relationship.

D. Wrap Fee Programs

Beck Bode no longer accepts clients in a wrap fee program.

E. Assets Under Management

Beck Bode has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$666,352,130	\$0.00	December 31, 2025

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

Our Advisory fee is based on a percentage of the assets under management, including cash and money market positions, and is assessed quarterly, in advance, as negotiated between the client and our representative at an annual rate not to exceed 3%. It is calculated using the market value of the account, as of the last business day of the prior billing period. The final fee schedule will be memorialized in the client's Investment Advisory Agreement. Clients may terminate the agreement for a full refund of the advisory fee within five business days of signing the Investment Advisory Agreement. Thereafter, clients may terminate the Investment Advisory Agreement generally with 30 days' written notice.

Advisory Fee Description

Our advisory fee covers ongoing financial advisory and discretionary investment management services. These services may include, but are not limited to financial planning, investment policy, asset allocation, behavioral investment counseling, tax planning, insurance planning, estate planning, and college planning.

At our sole discretion, we may coordinate additional services on behalf of select individuals and families, such as personal tax preparation, legal, and private banking services. These service offerings may be provided by professionals affiliated with and/or unaffiliated with Beck Bode depending on the needs of the client. The client is under no obligation to engage the services of any such recommended professional, retains absolute discretion over all such implementation decisions, and is free to accept or reject any recommendations from representatives of Beck Bode.

Additional services may also include exclusive access to quarterly newsletters, webinars, seminars, and client events. In the event that a client requires extraordinary legal, tax, or other financial planning and/or consultation services (to be determined at our sole discretion), we may determine to charge for such additional services, the dollar amount of which shall be set forth in a separate written notice to the client.

Performance-Based Fees for Portfolio Management

Beck Bode does not charge performance-based fees, that is, fees based on a share of capital gains or capital appreciation of assets (such as a client that is a hedge fund or other pooled investment vehicles).

Subadviser Services Fees

Beck Bode may also act as a subadviser to unaffiliated third-party advisers. The notice of termination requirement and payment of fees for subadviser services will depend on the specific third-party investment adviser engaging Beck Bode as subadviser. This relationship will be memorialized in each contract between Beck Bode and each third-party adviser. The fees will not exceed any limit imposed by any regulatory agency.

Pension Consulting Services Fees

Pension Plan consulting fees may be based on a percentage of the assets held in the Plan, or on a flat rate basis, as negotiated between the Plan and our representative. If based on a percentage of assets held in the Plan, our annual fee for retirement plan consulting will not exceed 3%. Fees will be payable to us in advance or in arrears on the frequency (e.g., quarterly, monthly, etc.) agreed upon. If asset-based fees are negotiated, payment generally will be based on the value of the Plan assets as of the close of business on the last business day of the period as valued by the custodian of the assets. However, if the fee is paid by the Plan or the client through a third-party service provider, such fee will be calculated as determined by the provider. If the fee is paid prior to the services being provided, the Plan will be entitled to a prorated refund of any prepaid fees for services not received upon termination of the client agreement.

If a Plan engages us to provide ongoing investment recommendations to the Plan regarding the investment options (e.g., mutual funds, collective investment funds) to be made available to Plan participants, you should understand that there generally will be two layers of fees with respect to such assets. The Plan may pay an advisory fee to the fund manager and other expenses as a shareholder of the fund. The Plan will also pay us a fee for the investment recommendation services.

If a Plan makes available a variable annuity as an investment option, there are mortality, expense and administrative charges, fees for additional riders on the contract and charges for excessive transfers within a calendar year imposed by the variable annuity sponsor. If a Plan makes available a pooled guaranteed investment contract (GIC) fund, there are investment management and administrative fees associated with the pooled GIC fund.

Fees for Other Services

Certain non-investment services, including accounting services, may be subject to separate fees as agreed in writing.

Financial Planning Fees

Fixed Fees

The negotiated fixed rate for creating client financial plans is from \$500 to \$12,000.

Hourly Fees

Beck Bode does not negotiate hourly fees for financial planning or investment services.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in advance.

Payment of Performance-Based Fees

Beck Bode does not engage in Performance-based Fees.

Payment of Subadviser Fees

Subadviser fees may be withdrawn from clients' accounts or clients may be invoiced for such fees, as disclosed in each contract between Beck Bode and the applicable third-party adviser.

Payment of Pension Consulting Services Fees

Pension consulting fees are withdrawn directly from the client's accounts with plan sponsor's written authorization or may be invoiced and billed directly to the client. Plan sponsor may select the method in which they are billed. Fees are paid monthly or quarterly as agreed to by the client.

Payment of Financial Planning Fees

Financial planning fees are paid 50% in advance (but never more than six months in advance) with the remainder due upon presentation of the plan.

C. Client Responsibility for Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Beck Bode. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

Beck Bode collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

E. Outside Compensation for the Sale of Securities to Clients

Neither Beck Bode nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

Beck Bode does not manage accounts that are billed on performance-based fees.

Item 7: Types of Clients

Beck Bode generally provides advisory services to the following types of clients:

- ❖ Individuals & Families
- ❖ 401(k) Pension and Profit-Sharing Plans

There is no account minimum for any of Beck Bode's services.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

Beck Bode's methods of analysis include Fundamental analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. Beck Bode utilizes the information from various third-party research firms for their analysis.

Investment Strategies *Growth Strategy*

This strategy is designed for investors seeking long-term capital appreciation. It focuses on selecting a portfolio of publicly-traded equities with robust earnings potential. By emphasizing meticulous research and careful analysis of earnings estimates, the strategy targets companies with strong growth prospects. The strategy may exhibit higher price volatility; therefore, clients who adopt this approach should be prepared to accept short-term market fluctuations in exchange for the opportunity of superior long-term returns.

Income Growth Strategy

The Income Growth Strategy emphasizes building a portfolio of dividend-paying stocks – primarily within the Utilities sector – that offer both a reliable income stream and the potential for dividend increases over time. In this approach, rising dividends serve as a signal of a company’s improving fundamentals and long-term potential. The strategy is especially suited for investors who need current income (for example, retirees) but still want to benefit from the power of compounding as reinvested dividends contribute to overall portfolio growth. As this is a strategy involving individual equities, clients who adopt this approach should be prepared to accept short-term market fluctuations in exchange for the opportunity of superior long-term returns.

Options Strategy

The Beck Bode Options Strategy is a short-term, high-leverage approach aimed at capitalizing on rapid price movements, relying on the same core principles that guide the firm’s Growth Strategy. In practice, it involves constructing a portfolio of call or put options, which grant the right (but not the obligation) to buy or sell an underlying asset at a predetermined strike price before a specified expiration date. While this approach can yield substantial gains if market prices move favorably, it also carries extreme volatility and the possibility of losing the entire premium if the market goes against the position. As a result, it demands rigorous risk management, disciplined execution, and a strong tolerance for rapid fluctuations, making it suitable only for investors prepared to accept significant downside risk and possible loss of capital.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Options transactions involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Beck Bode's use of options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature. **Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities will fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither Beck Bode nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither Beck Bode nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

None.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

Beck Bode does not utilize nor select third-party investment advisers.

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

A. Code of Ethics

Beck Bode has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Beck Bode's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

Beck Bode does not recommend that clients buy or sell any security in which a related person to Beck Bode or Beck Bode has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Beck Bode may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Beck Bode to buy or sell the same securities before or after recommending the same securities to clients, resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Beck Bode will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of Beck Bode may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Beck Bode to buy or sell securities before or after recommending securities to clients resulting in representatives profiting from the recommendations they provide to clients. Such transactions may create a conflict of interest; however, Beck Bode will never engage in trading that operates to the client's disadvantage if representatives of Beck Bode buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on Beck Bode's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not

necessarily pay the lowest commission or commission equivalent, and Beck Bode may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Beck Bode's research efforts. Beck Bode will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Beck Bode will require clients to use Altruist Financial LLC, Schwab Institutional, a division of Charles Schwab & Co., Inc. ("Schwab" or "Schwab Advisor Services"), or LPL Financial LLC.

1. Research and Other Soft-Dollar Benefits

While Beck Bode has no formal, written soft dollars agreements in which soft dollars are used to pay for third party services, Beck Bode may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). See the description of economic benefits under Item 14A. Beck Bode may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and Beck Bode does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. Beck Bode benefits by not having to produce or pay for the research, products or services, and Beck Bode will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that Beck Bode's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

Beck Bode receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

Beck Bode will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

If Beck Bode buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, Beck Bode would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. Beck Bode would determine

the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for Beck Bode's advisory services provided on an ongoing basis are reviewed at least annually by the client's assigned representative, with regard to their respective investment policies and long-term objectives. The entire review process is overseen by Benjamin Beck, Chief Investment Officer.

All financial planning accounts are reviewed upon financial plan creation and are reviewed at least annually by the client's assigned representative. The process is overseen by Meg Curry, Director of Financial Planning. Ms. Curry and other advisers conduct the plan delivery. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, Beck Bode's services will generally conclude upon delivery of the financial plan, unless the agreement is specified as "ongoing."

C. Content and Frequency of Regular Reports Provided to Clients

Each client of Beck Bode's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan electronically through eMoney upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Beck Bode maintains institutional relationships with Altruist Financial LLC, Schwab Advisor Services, and LPL Financial as custodians that provide trading, custody, and other services generally not available to retail investors, often at reduced or no additional charge if certain asset thresholds are met. These services may include research tools, technology solutions (such as access to account data and trade execution platforms), educational events, and various back-office or practice management resources. In some cases, the custodian may waive fees or cover a portion of third-party costs on Beck Bode's behalf. While these benefits can help us manage and grow our business, they may not always directly benefit client accounts and thus create a potential conflict of interest. Beck Bode is independently owned and operated and is not affiliated with any custodian.

B. Compensation to Non - Advisory Personnel for Client Referrals

Beck Bode does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

The Firm does not maintain physical custody of client funds and/or securities. All client assets are held at qualified custodians who provide account statements (at least quarterly) directly to clients at their address of record or electronically. However, the Firm may be deemed to have custody of a client's assets to the extent the client authorizes the Firm to instruct the client's custodian to deduct the Firm's advisory fees directly from the client's account. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

Beck Bode provides discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Beck Bode generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, Beck Bode's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to Beck Bode).

Item 17: Voting Client Securities (Proxy Voting)

Beck Bode will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

Beck Bode neither requires nor solicits prepayment of more than \$1200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither Beck Bode nor its management has any financial condition that is likely to reasonably impair Beck Bode's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

Beck Bode has not been the subject of a bankruptcy petition in the last ten years.