

Item 1. Cover Page

STRINGER ASSET MANAGEMENT, LLC

March 24, 2017

FIRM BROCHURE

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This brochure provides information about the qualifications and business practices of Stringer Asset Management, LLC (“Stringer”). If you have any questions about the contents of this brochure, please contact us by telephone at: 901-800-2956 or by email at: chad.keller@stringeram.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Stringer’s registration as an Investment Adviser does not imply a certain level of skill or training.

Additional information about Stringer is available on the SEC’s website at www.adviserinfo.sec.gov.

Stringer Asset Management, LLC, a Registered Investment Adviser

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Item 2. Material Changes

This Item discusses only the material changes that have occurred since Stringer Asset Management's last annual update.

There have been no material changes since the last annual update dated February 29, 2016.

Item 3. Table of Contents

CONTENTS

| | | |
|----------|---|-----|
| Item 1. | Cover Page..... | i |
| Item 2. | Material Changes | ii |
| Item 3. | Table of Contents | iii |
| Item 4. | Advisory Business | 4 |
| Item 5. | Fees and Compensation | 6 |
| Item 6. | Performance-Based Fees and Side-by-Side Management..... | 7 |
| Item 7. | Types of Clients | 8 |
| Item 8. | Methods of Analysis, Investment Strategies and Risk of Loss | 8 |
| Item 9. | Disciplinary Information..... | 10 |
| Item 10. | Other Financial Industry Activities and Affiliations | 10 |
| Item 11. | Code of Ethics | 10 |
| Item 12. | Brokerage Practices..... | 11 |
| Item 13. | Review of Accounts | 14 |
| Item 14. | Client Referrals and Other Compensation..... | 15 |
| Item 15. | Custody | 15 |
| Item 16. | Investment Discretion | 15 |
| Item 17. | Voting Client Securities..... | 15 |
| Item 18. | Financial Information..... | 16 |
| | BROCHURE SUPPLEMENT – Gary Stringer | 17 |
| | BROCHURE SUPPLEMENT – Chad Keller..... | 20 |
| | BROCHURE SUPPLEMENT – Kim Escue | 23 |
| | BROCHURE SUPPLEMENT – Jonathan Bernstein | 26 |
| | BROCHURE SUPPLEMENT – Kenneth Hill | 29 |

Item 4. Advisory Business

Stringer Asset Management is a registered investment adviser that provides services through (i) model portfolios on a sub-advisory basis (through the direct delivery of said models and through separately managed accounts), and (ii) a registered investment company, the Stringer Growth Fund and the Stringer Moderate Growth Fund (the “Funds”). When acting as a sub-adviser or an adviser, the Firm’s relationship is generally with the institution that designates Stringer Asset Management to manage such assets. Throughout this Disclosure Brochure, any reference to the institution that designates Stringer Asset Management to manage assets is referred to as the “institutional client” as distinguished from the beneficial owner of the assets being managed.

Prior to engaging Stringer Asset Management to provide any of the foregoing investment advisory services, all clients are required to enter into one or more written agreements with Stringer Asset Management setting forth the terms and conditions under which Stringer Asset Management renders its services (collectively the “*Agreement*”).

Stringer Asset Management was formed in October 2012 and is wholly owned by Laurus Principal Group, LLC.

This Disclosure Brochure describes the business of Stringer Asset Management. Certain sections may also describe the activities of *Supervised Persons*. *Supervised Persons* are any of Stringer Asset Management’s officers, partners, directors (or other persons occupying a similar status or performing similar functions), or employees, or any other person who provides investment advice on the Firm’s behalf and is subject to Stringer Asset Management’s supervision or control.

Investment Management Services

Institutional clients can engage Stringer Asset Management to manage all or a portion of their assets on a discretionary basis. The Firm offers model portfolios to institutional clients through a sub-advisory relationship. Pursuant to that relationship, the institutional client is generally responsible for conducting an initial assessment and reviewing the investment needs, goals, objectives and risk tolerance of the beneficial owner of the assets (or end-client). Thereafter, funds are allocated to Stringer Asset Management for discretionary management services.

Stringer Asset Management primarily allocates clients’ investment management assets among exchange-traded funds (“ETFs”) and secondarily among mutual funds. In addition, when we feel it is appropriate to or is in the client’s best interests, Stringer Asset Management will allocate assets among individual debt and equity securities, corporate debt securities, municipal securities, U.S. government securities and investment company securities. When appropriate and desirable, the Firm will also research and offer advice pertaining to other types of investments as needed to meet a client’s needs.

All clients are advised to promptly notify Stringer Asset Management if there are changes in their clients’ or their own financial situation or investment objectives, respectively, or if they wish to impose any reasonable restrictions upon Stringer Asset Management’s management services. Clients may impose reasonable restrictions or mandates on the management of their account (e.g., require that a portion of their assets be invested in socially responsible funds) if, in the Firm’s sole discretion, the conditions will not materially impact the performance of a portfolio strategy or prove overly burdensome to its management efforts.

Wrap Fee Programs

Stringer Asset Management offers investment advice to clients through our participation in “wrap fee” programs. These programs are offered by brokerage firms to provide their clients with access to non-affiliated investment advisers. Wrap fee accounts are managed in the same manner as other accounts that we manage. If a sponsor’s client selects the Firm to manage funds, we receive a portion of the fee charged by the sponsor.

Different Types of Wrap Fee Programs

Clients can access our strategies and the Stringer Funds through wrap fee program SMA, UMA, or MDP accounts at Sponsor Firms. Below is a brief description of each type of account and discussion of how they differ from each other with respect to Stringer Asset Management's offerings.

*SMA*s

A separately managed account ("SMA") is an individually managed account offered by Sponsor Firms through one of their Financial Advisors and managed by an independent investment management firm (the "investment manager" or "manager"). These programs typically offer a wide array of investment managers from which the client can choose.

When a client (or a client's Sponsor Firm with discretion) selects an investment manager for an SMA, the client will usually grant the investment manager full discretion (including trading discretion) over the account. With this authority, the manager directs trading activity in the account according to its investment process and securities selection discipline. Trading discretion requires the investment manager to seek best execution for trades executed in the SMA. Each SMA requires its own custodial account. As a result, a client who chooses to invest with multiple managers maintains multiple custodial accounts at the Sponsor Firm – one for each investment manager selected.

If selected to manage the assets in a client's SMA maintained by a Sponsor Firm, Stringer Asset Management will provide investment management services on a discretionary basis to that client in accordance with one or more model portfolios selected by the client. For more information about Stringer Asset Management's trading policies, please see Item 12 of this Brochure.

MDPs and UMAs

Model delivery platforms ("MDPs") are wrap program accounts for which Stringer Asset Management only provides a model to the Sponsor Firm. Under these arrangements, Stringer Asset Management generally provides non-discretionary investment advice in the form of the relevant investment models. Stringer Asset Management generally does not have discretion, trading or otherwise, over these accounts. These programs are often referred to as Model Delivery Arrangements, Model Manager Sub-Advisory Arrangements, or Model Delivery Platforms. Stringer Asset Management does not operationally distinguish between MDP accounts and UMA (as defined below).

Unified managed accounts ("UMAs") are similar to MDPs, but there are important differences that investors should take the time to understand. A UMA combines all of a client's assets into a single account. While an MDP account holds the securities associated with a single investment manager in a unique custodial account at the Sponsor Firm, a UMA typically holds multiple investment strategies in the same custodial account, as well as other investment products such as mutual funds, individual stocks, or bonds.

In a UMA or MDP account, the investment manager delivers an investment model to the Sponsor Firm and often does not have trading discretion over the account. Clients should speak to their Financial Advisor about the similarities and differences associated with SMAs, UMAs, and MDP accounts so they fully understand their specific account structure.

Performance Differences between Stringer Asset Management SMA, UMA, and MDP Accounts

While Stringer Asset Management SMA, UMA, and MDP accounts utilizing the same Investment Solutions may perform similarly, there are expected to be performance differences between them. There will be performance dispersion between UMAs and MDP accounts as compared to SMAs because Stringer Asset Management does not have trading discretion over the UMAs and MDP accounts. (For more information on Stringer Asset Management's trading policies and procedures, please see Item 12 of this Brochure.)

Assets under Management

On February 28, 2017, Stringer Asset Management had \$101 million in discretionary assets under management. Discretionary assets are those over which the Firm has full authority to make investment decisions.

Assets under Advisement

As of February 28, 2017, Stringer Asset Management had \$351 million in Assets under Advisement. Assets Under Advisement represent those assets for which we provide investment decisions as to which securities to buy and/or sell, as well as the target weight of the security involved in the trade but for which we do not effect the trade. As a result, these assets are not included as assets under management.

Item 5. Fees and Compensation

Investment Management Fee

Stringer Asset Management provides investment management services for an annual fee based upon a percentage of the market value of the clients' assets being managed by the Firm. In the case of institutional clients, Stringer Asset Management is paid for its investment management services directly by the institutional client. The Firm's annual fee is exclusive of, and in addition to brokerage commissions, transaction fees, and other related costs and expenses which are incurred by the client. Stringer Asset Management does not, however, receive any portion of these commissions, fees, and costs. Stringer Asset Management's annual fee is prorated and charged quarterly, in advance, based on the last day of the previous quarter. The annual fee for all clients varies (between 0.25% and 1.00%) depending upon the market value of the assets under management and scope of services provided.

Stringer Asset Management, in its sole discretion, will negotiate to charge a lesser management fee based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, *pro bono* activities, etc.).

Fees Charged by Financial Institutions

As further discussed in response to Item 12 (below), Stringer Asset Management generally recommends that clients utilize the brokerage and clearing services of an independent broker-dealer for investment management accounts.

Stringer Asset Management may only implement its investment management recommendations after the client has arranged for and furnished Stringer Asset Management with all information and authorization regarding accounts with appropriate financial institutions. Financial institutions include, but are not limited to any broker-dealers recommended by Stringer Asset Management, broker-dealers directed by the client, trust companies, banks, etc. (collectively referred to herein as the "*Financial Institutions*").

Clients may incur certain charges imposed by the *Financial Institutions* and other third parties such as custodial fees, charges imposed directly by a mutual fund or ETF in the account, which are disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Additionally, for assets outside of any wrap fee programs, clients generally will incur brokerage commissions and transaction fees. Such charges, fees and commissions are exclusive of and in addition to Stringer Asset Management's fee.

The Firm's *Agreement* and the separate agreement with any *Financial Institutions* may authorize Stringer Asset Management to debit the client's account for the amount of the Firm's fee and to directly remit that management fee to Stringer Asset Management. Any *Financial Institutions* recommended by Stringer Asset Management have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid directly to Stringer Asset Management. Certain clients have the option to elect to have Stringer Asset Management send an invoice for payment.

Fees for Management during Partial Quarters of Service

For the initial period of investment management services, the fees are calculated on a *pro rata* basis and charged in arrears. Thereafter, client fees are charged in advance.

The *Agreement* between Stringer Asset Management and the client will continue in effect until terminated by either party pursuant to the terms of the *Agreement*. Stringer Asset Management's fees are prorated through the date of termination and any remaining balance is charged or refunded to the client, as appropriate.

Registered Investment Company - Stringer Growth Fund and Moderate Growth Funds

Stringer Asset Management's annual fee schedule for the Stringer Growth Fund is 0.95% on assets under management. The annual fee schedule for the Stringer Moderate Growth Fund is 0.80% on assets under management. Additionally, several employees of Stringer Asset Management are registered representatives of Matrix Capital Group, Inc.

Fees related to the Stringer Funds

Stringer Asset Management is the investment adviser to the Stringer Growth Fund and the Stringer Moderate Growth Fund (the "Funds"). The Funds are a series of the 360 Funds, an open-end management investment company organized as a Delaware statutory trust on February 25, 2005. 360 Funds is responsible for the overall management of the Fund's business affairs.

The Growth Fund offers three classes of shares: (i) Class A Shares, (ii) Class C Shares, and (iii) Institutional Class Shares. Investors pay certain fees and expenses to buy and hold shares of the Fund. The Fund's fee and expense schedule is found in the Funds' prospectus at:

<http://www.stringeram.com/private/Stringer%20Growth%20Fund%20Prospectus.pdf>

The Moderate Growth Fund offers three classes of shares: (i) Class A Shares, (ii) Class C Shares, and (iii) Institutional Class Shares. Investors pay certain fees and expenses to buy and hold shares of the Fund. The Fund's fee and expense schedule is found in the Funds' prospectus at:

<http://stringeram.com/private/Stringer%20Moderate%20Growth%20Fund%20Prospectus.pdf>

Item 6. Performance-Based Fees and Side-by-Side Management

Stringer Asset Management does not provide any services for performance-based fees. Performance-based fees are those based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7. Types of Clients

Stringer Asset Management provides investment advisory services to individuals, high net worth individuals, and investment companies.

Minimums

The Firm does not impose a minimum account size or minimum fee as a condition for starting and maintaining a relationship; provided, however, the Fund does have a minimum investment amount. A client's custodian, however, may separately require a minimum account size.

Please refer to the Stringer Growth Fund and Moderate Growth Fund Prospectus for account minimums.

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

Investment Strategies

The Firm's investment management process seeks to be investor-specific and incorporate current and forward-looking ideas to define appropriate portfolios for a given set of investor circumstances. Stringer Asset Management believes that investors can benefit from both active and passive investing as well as strategic and tactical asset allocations. The Firm also believes that there are times when investors may benefit by increasing the level of cash in their portfolios. In general, the Firm adheres to the following principles:

- Utilize proprietary tactical elements in the overall investment approach in order to take advantage of market opportunities as they present themselves and as one means of becoming more defensive when seen fit.
- Utilize active managers who are benchmark agnostic. In other words, the managers can pursue opportunities across their respective range of expertise. When analyzing these active managers, the Firm likes to think along the lines of Warren Buffett when he wrote in his 2010 letter to Berkshire Hathaway shareholders, "our only style box is 'smart.'"
- Recognize there are certain periods of time when the financial markets cease to function properly. There are occasions when sellers dominate the markets causing prices to decline precipitously. Through a systematic process, the Firm has developed its Cash Indicator, which seeks to not only raise cash in order to position portfolios more defensively when markets break down, but also to reinvest that cash at more attractive valuations.
- Primarily utilize ETFs and other similar investments in portfolios to minimize costs while seeking to boost performance and create tax efficiency.

Methods of Analysis

Stringer Asset Management generally analyzes investments using an asset allocation strategy based on Modern Portfolio Theory ("MPT").

MPT is a mathematical based investment discipline that seeks to quantify expected portfolio returns in relation to corresponding portfolio risk. The basic premise of MPT is that the risk of a particular holding is to be assessed by comparing its price variations against those of the market portfolio.

However, MPT disregards certain investment considerations and is based on a series of assumptions that may not necessarily reflect actual market conditions. As such, the factors for which MPT does not account (e.g., tax implications, regulatory constraints and brokerage costs) may negate the upside or add to the actual risk of a particular allocation. Nonetheless, Stringer Asset Management's investment process is structured in such a way to integrate those assumptions and real life considerations for which MPT analytics do not account.

Risks of Loss

General Risk of Loss

Investing in securities involves the risk of loss. Clients should be prepared to bear such loss.

Market Risks

The profitability of a portion of Stringer Asset Management's recommendations may depend to a great extent upon correctly assessing the future course of price movements of stocks and bonds. There can be no assurance that Stringer Asset Management will be able to predict those price movements accurately.

Mutual Funds and ETFs

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders' fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed-based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

Management Through Similarly Managed Accounts

For certain clients, Stringer Asset Management manages portfolios by allocating portfolio assets among various securities on a discretionary basis using one or more of its proprietary investment strategies (collectively referred to as "*investment strategy*"). In so doing, Stringer Asset Management buys, sells, exchanges and/or transfers securities based upon the *investment strategy*.

Stringer Asset Management's management using the *investment strategy* complies with the requirements of Rule 3a-4 of the Investment Company Act of 1940, as amended. Rule 3a-4 provides similarly managed accounts, such as the *investment strategy*, with a safe harbor from the definition of an investment company.

The *investment strategy* may involve an above-average portfolio turnover that could negatively impact upon the net after-tax gain experienced by an individual client. Securities in the *investment strategy* are usually exchanged and/or transferred without regard to a client's individual tax

ramifications. Certain investment opportunities that become available to Stringer Asset Management's clients may be limited. For example, various mutual funds or insurance companies may limit the ability of Stringer Asset Management to buy, sell, exchange or transfer securities consistent with its *investment strategy*.

Item 9. Disciplinary Information

Stringer Asset Management is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management. Stringer Asset Management does not have any required disclosures to this Item.

Item 10. Other Financial Industry Activities and Affiliations

Stringer Asset Management is required to disclose any relationship or arrangement that is material to its advisory business or to its clients with certain related persons. Stringer Asset Management has described such relationships and arrangements below.

Related Investment Adviser

Stringer Asset Management is under common control with Snow Capital Management L.P., a federally registered investment adviser.

Investment Company

As noted in Item 4 above, Stringer Asset Management is the investment adviser to the Stringer Growth Fund and the Stringer Moderate Growth Fund. The Firm does not believe these advisory services create material conflicts of interest between the Firm and its other clients. The Firm follows strict written policies and procedures to ensure that all clients are treated fairly, regardless of the investment strategy and fee schedule associated with the account.

Item 11. Code of Ethics

Stringer Asset Management and persons associated with the Firm ("Associated Persons") are permitted to buy or sell securities that the Firm also recommends to clients consistent with Stringer Asset Management's policies and procedures.

Stringer Asset Management has adopted a code of ethics that sets forth the standards of conduct expected of its associated persons and requires compliance with applicable securities laws ("*Code of Ethics*"). Stringer Asset Management's *Code of Ethics* contains written policies reasonably designed to prevent the unlawful use of material non-public information by the Firm or any of its associated persons. The *Code of Ethics* also requires that certain of Stringer Asset Management's personnel (called "*Access Persons*") report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings.

When Stringer Asset Management is engaging in or considering a transaction in any security on behalf of a client, no *Access Person* may effect for themselves or for their immediate family (i.e., spouse, minor children, and adults living in the same household as the *Access Person*) a transaction in that

security unless:

- the transaction has been completed;
- the transaction for the Access Person is completed as part of a batch trade (as defined below in Item 12) with clients; or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments; (iii) shares issued by open-end mutual funds other than reportable funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more open-end mutual funds, none of which are reportable funds. Note that the Stringer Growth Fund and Moderate Growth Fund are reportable funds.

This *Code of Ethics* has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by *Access Persons* to be completed without any appreciable impact on the markets of such securities. Therefore, under certain limited circumstances, exceptions may be made to the policies stated above.

Clients and prospective clients may contact Stringer Asset Management to request a copy of its *Code of Ethics*.

Item 12. Brokerage Practices

Stringer Asset Management periodically and systematically reviews its policies and procedures regarding its recommendation of *Financial Institutions* in light of its duty to obtain best execution.

Wrap Fee Programs

In cases where Stringer Asset Management has trading discretion over a client account, we typically perform two types of trades for our clients. One type of trade is called a "model" trade, which is the purchase or sale of securities for our portfolios in one or more Investment Solutions. By its nature, a model trade will affect many client accounts at once. Model trades are almost always executed through a "step-out transaction," meaning that they are traded away from the client's Sponsor Firm for best execution purposes (described below).

The second type of trade is referred to as a "maintenance" trade. Maintenance trading reflects individual activity in a client's account, such as initial investment positioning, rebalancing due to additions or withdrawals of cash or securities, account liquidations, or other account-specific transactions such as client-directed tax transactions. These trades will generally be executed as orders with the client's Sponsor Firm at the then current market price. Placing these trades with another broker-dealer (other than the client's Sponsor Firm) will not likely add value since the relatively small amount of shares involved for each of the securities will not merit other types of trading.

With respect to certain transactions, including, without limitation, block trades in which Stringer Asset Management aggregates securities purchases or sales for a client account with those of one or more of its other clients, Stringer Asset Management will often, pursuant to its duty to seek best execution, determine to execute using step-out transactions (also referred to as "trade-aways"), even though such transactions require payment of a commission that is not covered by the wrap fee. Whenever Stringer Asset Management makes such a determination with respect to such a transaction, Stringer Asset Management will cause the account and, in the case of a block trade, any other included client accounts, to pay the executing broker-dealer the commission or commission equivalent such broker-dealer requires. These commissions or commission equivalents are charged to the client's account in

addition to the wrap fee paid to the Sponsor Firm, and are netted into the price received for a security and will not be reflected as individual items on the client trade confirmation. Because Stringer Asset Management has found that step-out transactions for model trades almost always allow it to obtain better trade executions for its clients, all or nearly all of the transactions in some client accounts will be traded away from the Sponsor Firm via step-out transactions. Given Stringer Asset Management's trading practices, a wrap account with Stringer Asset Management as the appointed investment manager may not be suitable for clients with minimal maintenance trades.

Some Sponsor Firms may not permit the use of step-out trades for their accounts. Clients/firms that do not allow us to engage in step-out trades will not benefit from our judgment when we believe it would be beneficial overall to implement trades in this manner.

In evaluating the wrap fee arrangement, a client should recognize that brokerage commissions for the execution of transactions in the client's account through the Sponsor Firm are solely determined by the Sponsor Firm. It is our understanding that these transactions are generally executed without commissions and a portion of the wrap fee is generally considered as being in lieu of brokerage commissions. When placing trades through Sponsor Firms (instead of stepping them out), we will generally aggregate orders where it is possible and in the client's best interests.

Both in deciding to execute step-out securities transactions and in selecting a broker-dealer to do so, we consider a variety of factors, including:

- our experience with the firm on prices and other results obtained in prior trading transactions;
- the quality of the brokerage services provided to us (and thus to our clients);
- the liquidity of the security being traded;
- the level of commissions (or commission equivalents per share when traded on a net basis) charged by that firm;
- the firm's ability to source liquidity in the underlying constituents when trading ETPs and the ability to provide transparency when doing so;
- the firm's market making activity in a stock; the firm's access to liquidity in the stock (described further below);
- the research (if any) services provided by the broker-dealer for the benefit of our clients (as discussed below);
- the speed and attention we receive from the trading desk for our clients; whether the firm has been able to trade anonymously for us (i.e., without others in the market knowing a buyer is interested in volume);
- whether the brokerage firm can and will commit its capital (if we request this) to obtain or dispose of the position for our clients;
- the market capitalization of the security being traded;
- the nature of our portfolio managers' desire (for example a desire for speed versus other factors, including concern with obtaining the stock within a price range for all accounts) to own the stock;
- the use of limit orders and the likelihood of getting within the limit or missing the desired trade if the trading process takes too long;
- any particular trading expertise of the firm;
- access or potential access to blocks of a particular stock;
- market conditions at the time of the trade (both general conditions and conditions impacting the specific stock); and,
- any past issues we encountered when using a particular broker-dealer for similar trades.

For the Stringer Funds for which Stringer Asset Management has trading discretion, Stringer Asset Management will place trades for the underlying securities purchased and sold by these Funds with broker/dealers that are affiliated with Sponsor Firms for Stringer Asset Management clients, in instances where we believe best execution can be achieved. In all cases, Stringer Asset Management seeks best execution, as described above, when selecting broker-dealers for Fund trades.

Trade Aggregation and Allocation

Orders for the same security entered on behalf of more than one client, including investment companies sub-advised by Stringer Asset Management for which Stringer Asset Management has the ability to execute trades, will generally be aggregated pursuant to Stringer Asset Management's trade aggregation policy. Subsequent orders for the same security entered during the same trading day may be aggregated with any previously unfilled orders; filled orders are allocated separately from subsequent orders within the same day. All clients participating in each aggregated order receive the average price and if applicable, pay a pro rata portion of commissions. Transactions are usually aggregated to seek a more advantageous net price and/or to obtain better execution for all clients. However, trades through the same Sponsor Firm may not be aggregated if a material time lag exists between client trade requests in the same security on the same day.

Stringer Asset Management's allocation procedures seek to allocate investment opportunities among clients/portfolios in the fairest possible way taking into account clients' best interests. Stringer Asset Management will follow procedures to ensure that allocations do not involve a practice of favoring or discriminating against any client or group of clients. Account performance or compensation is never a factor in trade allocations.

In allocating trades, Stringer Asset Management allocates orders across portfolios with similar investment guidelines and investment styles fairly and equitably, taking into consideration relevant factors, including without limitation: applicable portfolio investment restrictions and guidelines; regulatory restrictions; account-specific investment restrictions and other client instructions; risk tolerances; amounts of available cash; the need to rebalance a client's portfolio (e.g., due to investor contributions and redemptions); whether the allocation would result in an account receiving an amount lower than the typical transaction size or an "odd lot;" and other account-specific factors.

Although allocating orders among clients may create potential conflicts of interest because we receive greater fees or compensation from some clients compared to other clients, or because we may be affiliated or have other relationships with certain clients, we will not make allocation decisions based on greater fees or compensation. Notwithstanding the foregoing, and considering our policy to treat all clients fairly and equitably over time, any particular allocation decision among accounts may be more or less advantageous to any one client or group of clients and certain allocations may, to the extent consistent with our fiduciary obligations, deviate from a pro rata basis among clients in order to address, for example, differences in legal, tax, regulatory, risk management, concentration, exposure and/or mandate considerations for the relevant clients. We may determine that an investment opportunity or particular purchases or sales are appropriate for one or more clients, but not for other clients, or are appropriate for, or available to, clients but in different sizes, terms, or timing than is appropriate for other clients.

Trade Order Rotation

As discussed above, Stringer Asset Management almost always executes model changes (as defined above) in SMAs as step-out transactions. Therefore, a trade rotation is rarely used for model changes for these SMAs. However, for certain strategies or solutions, including accounts that we are seeding for possible future composites, that are only available on a limited number of platforms and/or have small asset levels, Stringer Asset Management will implement SMA model changes through a trade rotation amongst the Sponsor Firms that offer the program.

Stringer Asset Management does not exercise trading discretion over its UMA/MDP accounts. As a result, Stringer Asset Management utilizes a rotation process to notify its UMA/MDP participating platforms of model changes. When updating models on these platforms, Stringer Asset Management contacts UMA/MDP Sponsor Firms in a pre-determined order so that no group of clients is consistently favored or disfavored over any other clients. Recommendations to UMA/MDP Sponsor Firms are alternated with Stringer Asset Management SMA accounts in a pre-determined order.

The client may direct Stringer Asset Management in writing to use a particular *Financial Institution* to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that *Financial Institution*, and Stringer Asset Management will not seek better execution services or prices from other *Financial Institutions* or be able to “batch” client transactions for execution through other *Financial Institutions* with orders for other accounts managed by Stringer Asset Management (as described below). As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, Stringer Asset Management may decline a client’s request to direct brokerage if, in the Firm’s sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker-dealers in return for investment research products and/or services which assist Stringer Asset Management in its investment decision-making process. Such research generally will be used to service all of Stringer Asset Management’s clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client’s portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because Stringer Asset Management does not have to produce or pay for the products or services.

Software and Support Provided by Financial Institutions

Stringer Asset Management receives from *Financial Institutions*, without cost to the Firm, computer software and related systems support, which allow Stringer Asset Management to better monitor client accounts maintained at a *Financial Institution*. Stringer Asset Management may receive the software and related support without cost because the Firm renders investment management services to clients that maintain assets at *Financial Institution*. The software and support is not provided in connection with securities transactions of clients (i.e. not “soft dollars”). The software and related systems support may benefit Stringer Asset Management, but not its clients directly. In fulfilling its duties to its clients, Stringer Asset Management endeavors at all times to put the interests of its clients first. Clients should be aware; however, that the Firm’s receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence Stringer Asset Management’s choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support, or services.

Item 13. Review of Accounts

For those institutional clients to whom Stringer Asset Management provides investment management services, Stringer Asset Management monitors those portfolios as part of an ongoing process while regular reviews are conducted on at least a quarterly basis. Such reviews are conducted by an investment adviser representative of the Firm. However, the institutional client will be responsible for reviewing individual account performance with the beneficial owner of those assets. All institutional clients are encouraged to discuss the needs, goals, and objectives with the beneficial owners and to keep the Firm informed of any changes thereto. Institutional clients and/or beneficial owners are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer or custodian for the accounts.

Item 14. Client Referrals and Other Compensation

Stringer Asset Management is required to disclose any relationship or arrangement where it receives an economic benefit from a third party (non-client) for providing advisory services. This type of relationship poses a conflict of interest and any such relationship is disclosed in response to Item 12, above.

In addition, Stringer Asset Management is required to disclose any direct or indirect compensation that it provides for client referrals. The Firm does not provide any direct or indirect compensation for client referrals.

Item 15. Custody

Stringer Asset Management's *Agreement* and/or the separate agreement with any *Financial Institution* allows Stringer Asset Management through such *Financial Institution* to debit the client's account for the amount of Stringer Asset Management's fee and to directly remit that management fee to Stringer Asset Management in accordance with applicable custody rules.

The *Financial Institutions* recommended by Stringer Asset Management have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid directly to Stringer Asset Management.

Item 16. Investment Discretion

Stringer Asset Management is given the authority to exercise discretion on behalf of clients. Stringer Asset Management is considered to exercise investment discretion over a client's account if it can effect transactions for the client without first having to seek the client's consent. The Firm is given this authority through a power-of-attorney included in the agreement between Stringer Asset Management and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). Stringer Asset Management takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold; and
- When transactions are made.

Within the Funds, which are part of a registered investment company, Stringer Asset Management's authority to trade securities is limited by certain federal securities and tax laws that require diversification of investments.

Under the arrangements described above, Stringer Asset Management may have the discretion in selecting the broker/dealer and the commission paid with certain accounts.

Item 17. Voting Client Securities

Stringer Asset Management votes client securities (proxies) on behalf of its clients unless we have written instructions from the client stating otherwise. When Stringer Asset Management accepts such

responsibility, it will only cast proxy votes in a manner consistent with the best interest of its clients. Absent special circumstances, which are fully-described in Stringer Asset Management's Proxy Voting Policies and Procedures, all proxies will be voted consistent with guidelines established and described in Stringer Asset Management's Proxy Voting Policies and Procedures, as they may be amended from time-to-time. Clients may contact Stringer Asset Management to request information about how Stringer Asset Management voted proxies for that client's securities or to get a copy of Stringer Asset Management's Proxy Voting Policies and Procedures. A brief summary of Stringer Asset Management's Proxy Voting Policies and Procedures is as follows:

- Stringer Asset Management has formed a Proxy Voting Committee that will be responsible for monitoring corporate actions, making voting decisions in the best interest of clients, and ensuring that proxies are submitted in a timely manner.
- The Proxy Voting Committee will generally vote proxies according to Stringer Asset Management's then current Proxy Voting Guidelines. The Proxy Voting Guidelines include many specific examples of voting decisions for the types of proposals that are most frequently presented, including: composition of the board of directors; approval of independent auditors; management and director compensation; anti-takeover mechanisms and related issues; changes to capital structure; corporate and social policy issues; and issues involving mutual funds.
- Although the Proxy Voting Guidelines are followed as a general policy, certain issues are considered on a case-by-case basis based on the relevant facts and circumstances. Since corporate governance issues are diverse and continually evolving, Stringer Asset Management devotes an appropriate amount of time and resources to monitor these changes.
- Clients cannot direct Stringer Asset Management's vote on a particular solicitation but can revoke Stringer Asset Management's authority to vote proxies.

In situations where there may be a conflict of interest in the voting of proxies due to business or personal relationships that Stringer Asset Management maintains with persons having an interest in the outcome of certain votes, Stringer Asset Management takes appropriate steps to ensure that its proxy voting decisions are made in the best interest of its clients and are not the product of such conflict.

Item 18. Financial Information

Stringer Asset Management does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance. In addition, Stringer Asset Management is required to disclose any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. Stringer Asset Management has no disclosures pursuant to this Item.

BROCHURE SUPPLEMENT

March 24, 2017

GARY S. STRINGER

Stringer Asset Management, LLC
5050 Poplar Avenue, Suite 1103
Memphis, Tennessee 38157
901-800-2956

This Brochure Supplement provides information about Gary S. Stringer that supplements the Disclosure Brochure of Stringer Asset Management, LLC (hereinafter “Stringer Asset Management”), a copy of which you should have received. Please contact Stringer Asset Management’s Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Gary S. Stringer is available on the SEC’s website at www.adviserinfo.sec.gov.

Stringer Asset Management, LLC, a Registered Investment Adviser

5050 Poplar Avenue, Suite 1103, Memphis, Tennessee 38157

901-800-2956 | www.stringeram.com

Item 2. Educational Background and Business Experience

Born 1973

Post-Secondary Education

University of Maryland | B.S., Marketing | 1997

Recent Business Background

Stringer Asset Management, LLC | President and Chief Investment Officer | February 2013 – Present

Morgan Keegan & Company, Inc. | Managing Director | August 2005 – February 2013

Professional Designations

Gary S. Stringer holds the professional designation of Chartered Financial Analyst (“CFA”).

The CFA® charter is a credential awarded by the CFA Institute to individuals who meet its education, examination, sponsorship, experience and ethics requirements. To earn a CFA® charter, eligible candidates must have four years of qualified investment work experience, become a member of the CFA Institute, adhere to the Code of Ethics and Standards of Professional Conduct on an ongoing basis, and complete the CFA® program, which requires the passage of three separate six-hour examinations. Topics tested by the CFA Institute include ethical standards, quantitative methods, economics, financial reporting, corporate finance, equities, fixed income, derivatives, alternative investments, and portfolio management.

For additional information about each of these credentials, please refer directly to the website of the issuing organization.

Item 3. Disciplinary Information

Stringer Asset Management is required to disclose information regarding any legal or disciplinary events material to a client’s evaluation of Gary S. Stringer. Stringer Asset Management has no information to disclose in relation to this Item.

Item 4. Other Business Activities

Stringer Asset Management is required to disclose information regarding any investment-related business or occupation in which Gary S. Stringer is actively engaged. Stringer Asset Management has no information to disclose in relation to this Item.

Item 5. Additional Compensation

Stringer Asset Management is required to disclose information regarding any arrangement under which Gary S. Stringer receives an economic benefit from someone other than a client for providing investment advisory services. Stringer Asset Management has no information to disclose in relation to this Item.

Item 6. Supervision

Chad Keller, Chief Operating Officer and Chief Compliance Officer, is generally responsible for supervising Gary S. Stringer's advisory activities on behalf of Stringer Asset Management. The telephone number to reach Chad Keller is 901-800-2956.

Stringer Asset Management supervises its personnel and the investments made in client accounts. Stringer Asset Management monitors the investments recommended by Gary S. Stringer to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. Stringer Asset Management periodically reviews the advisory activities of Gary S. Stringer, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Gary S. Stringer. Additionally, Gary Stringer is a registered representative of Matrix 360 Distributors, LLC.

BROCHURE SUPPLEMENT

March 24, 2017

CHAD N. KELLER

Stringer Asset Management, LLC
5050 Poplar Avenue, Suite 1103
Memphis, Tennessee 38157
901-800-2956

This Brochure Supplement provides information about Chad N. Keller that supplements the Disclosure Brochure of Stringer Asset Management, LLC (hereinafter “Stringer Asset Management”), a copy of which you should have received. Please contact Stringer Asset Management’s Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Chad N. Keller is available on the SEC’s website at www.adviserinfo.sec.gov.

Stringer Asset Management, LLC, a Registered Investment Adviser

5050 Poplar Avenue, Suite 1103, Memphis, Tennessee 38157

901-800-2956 | www.stringeram.com

Item 2. Educational Background and Business Experience

Born 1980

Post-Secondary Education

University of Memphis | M.B.A. | 2007

University of Tennessee | B.A., Economics | 2003

Recent Business Background

Stringer Asset Management, LLC | Chief Compliance Officer, Chief Operating Officer | February 2013 – Present

Morgan Keegan & Company, Inc. | First Vice President | August 2005 – February 2013

Professional Designations

Chad N. Keller holds the professional designation of CERTIFIED FINANCIAL PLANNER™ (“CFP®”).

The CFP® certification is a financial planning credential awarded by the Certified Financial Planner Board of Standards Inc. (the “CFP Board”) to individuals who meet its education, examination, experience and ethics requirements. Eligible candidates are generally required to have three years of financial planning related experience and possess a bachelor’s degree from an accredited U.S. college or university. Certificants are further required to complete a CFP Board-Registered Education Program (or possess a qualifying professional credential), clear a personal and professional background check, and pass the CFP® Certification Examination, a ten-hour multiple choice exam divided into three separate sessions. In order to maintain the certification, CFP® designees must also complete at least 30 hours of continuing education every two years on an ongoing basis.

For additional information about each of these credentials, please refer directly to the website of the issuing organization.

Item 3. Disciplinary Information

Stringer Asset Management is required to disclose information regarding any legal or disciplinary events material to a client’s evaluation of Chad N. Keller. Stringer Asset Management has no information to disclose in relation to this Item.

Item 4. Other Business Activities

Stringer Asset Management is required to disclose information regarding any investment-related business or occupation in which Chad N. Keller is actively engaged. Stringer Asset Management has no information to disclose in relation to this Item.

Item 5. Additional Compensation

Stringer Asset Management is required to disclose information regarding any arrangement under which Chad N. Keller receives an economic benefit from someone other than a client for providing investment advisory services. Stringer Asset Management has no information to disclose in relation to this Item.

Item 6. Supervision

While Chad N. Keller is the Chief Operating Officer and Chief Compliance Officer of the firm and generally responsible for his own supervision, Gary Stringer periodically reviews his advisory activities on behalf of Stringer Asset Management. Chad N. Keller seeks to ensure that investments are suitable for his individual clients and consistent with their individual needs, goals, objectives and risk tolerance, as well as any restrictions requested by Stringer Asset Management's clients. The telephone number to reach Gary Stringer, President of Stringer Asset Management, is 901-800-2956. Additionally, Chad Keller is a registered representative of Matrix 360 Distributors, LLC.

BROCHURE SUPPLEMENT

March 24, 2017

KIM F. ESCUE

Stringer Asset Management, LLC
5050 Poplar Avenue, Suite 1103
Memphis, Tennessee 38157
901-800-2956

This Brochure Supplement provides information about Kim F. Escue that supplements the Disclosure Brochure of Stringer Asset Management, LLC (hereinafter “Stringer Asset Management”), a copy of which you should have received. Please contact Stringer Asset Management’s Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Kim F. Escue is available on the SEC’s website at www.adviserinfo.sec.gov.

Stringer Asset Management, LLC, a Registered Investment Adviser

5050 Poplar Avenue, Suite 1103, Memphis, Tennessee 38157

901-800-2956 | www.stringeram.com

Item 2. Educational Background and Business Experience

Born 1968

Post-Secondary Education

University of Memphis | M.B.A., Finance | 1994

University of Memphis | B.B.A., Finance | 1990

Recent Business Background

Stringer Asset Management, LLC | Senior Portfolio Manager | February 2013 – Present

Morgan Keegan & Company, Inc. | Senior Vice President | October 2002 – February 2013

Professional Designations

Kim F. Escue holds the professional designation of Chartered Financial Analyst (“CFA”).

The CFA® charter is a credential awarded by the CFA Institute to individuals who meet its education, examination, sponsorship, experience and ethics requirements. To earn a CFA® charter, eligible candidates must have four years of qualified investment work experience, become a member of the CFA Institute, adhere to the Code of Ethics and Standards of Professional Conduct on an ongoing basis, and complete the CFA® program, which requires the passage of three separate six-hour examinations. Topics tested by the CFA Institute include ethical standards, quantitative methods, economics, financial reporting, corporate finance, equities, fixed income, derivatives, alternative investments, and portfolio management.

For additional information about this credential, please refer directly to the website of the issuing organization.

Item 3. Disciplinary Information

Stringer Asset Management is required to disclose information regarding any legal or disciplinary events material to a client’s evaluation of Kim F. Escue. Stringer Asset Management has no information to disclose in relation to this Item.

Item 4. Other Business Activities

Stringer Asset Management is required to disclose information regarding any investment-related business or occupation in which Kim F. Escue is actively engaged. Stringer Asset Management has no information to disclose in relation to this Item.

Item 5. Additional Compensation

Stringer Asset Management is required to disclose information regarding any arrangement under which Kim F. Escue receives an economic benefit from someone other than a client for providing investment advisory services. Stringer Asset Management has no information to disclose in relation to this Item.

Item 6. Supervision

Chad Keller, Chief Operating Officer and Chief Compliance Officer, is generally responsible for supervising Kim F. Escue's advisory activities on behalf of Stringer Asset Management. The telephone number to reach Chad Keller is 901-800-2956.

Stringer Asset Management supervises its personnel and the investments made in client accounts. Stringer Asset Management monitors the investments recommended by Kim F. Escue to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. Stringer Asset Management periodically reviews the advisory activities of Kim F. Escue, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Kim F. Escue. Additionally, Kim Escue is a registered representative of Matrix 360 Distributors, LLC.

March 24, 2017

JONATHAN I. BERNSTEIN

Stringer Asset Management, LLC

2326 Chelsea Ridge Court

Katy, Texas 77450

281-829-7009

This Brochure Supplement provides information about Jonathan I. Bernstein that supplements the Disclosure Brochure of Stringer Asset Management, LLC (hereinafter “Stringer Asset Management”), a copy of which you should have received. Please contact Stringer Asset Management’s Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Jonathan I. Bernstein is available on the SEC’s website at www.adviserinfo.sec.gov.

Stringer Asset Management, LLC, a Registered Investment Adviser

5050 Poplar Avenue, Suite 1103, Memphis, Tennessee 38157

901-800-2956 | www.stringeram.com

Item 2. Educational Background and Business Experience

Born 1968

Post-Secondary Education

Brooklyn College | B.S., Business Administration and Finance | 1994

Recent Business Background

Stringer Asset Management, LLC | Sales and Marketing Director | February 2013 – Present

Morgan Keegan & Company, Inc. | Senior Vice President | April 2004 – February 2013

Professional Designations

Jonathan I. Bernstein holds the professional designation of Certified Investment Management Analyst (“CIMA”).

The CIMA certification is an asset management credential administered through the Investment Management Consultants Association (“IMCA”) to individuals who meet its experience, ethical, education and examination requirements. Prerequisites for the CIMA designation include three years of financial services experience and an acceptable regulatory history. In order to obtain the CIMA certification, candidates must successfully complete a one-week classroom education program at an accredited university business school and pass an online certification examination. CIMA designees are further required to adhere to the IMCA’s Code of Professional Responsibility and Standards of Practice on an ongoing basis. CIMA designees must also report 40 hours of continuing education credits on a biannual basis in order to maintain the designation.

For additional information about this credential, please refer directly to the website of the issuing organization.

Item 3. Disciplinary Information

Stringer Asset Management is required to disclose information regarding any legal or disciplinary events material to a client’s evaluation of Jonathan I. Bernstein. Stringer Asset Management has no information to disclose in relation to this Item.

Item 4. Other Business Activities

Stringer Asset Management is required to disclose information regarding any investment-related business or occupation in which Jonathan I. Bernstein is actively engaged. Stringer Asset Management has no information to disclose in relation to this Item.

Item 5. Additional Compensation

Stringer Asset Management is required to disclose information regarding any arrangement under which Jonathan I. Bernstein receives an economic benefit from someone other than a client for providing investment advisory services. Stringer Asset Management has no information to disclose in relation to this Item.

Item 6. Supervision

Chad Keller, Chief Operating Officer and Chief Compliance Officer, is generally responsible for supervising Jonathan I. Bernstein's advisory activities on behalf of Stringer Asset Management. The telephone number to reach Chad Keller is 901-800-2956.

Stringer Asset Management supervises its personnel and the investments made in client accounts. Stringer Asset Management monitors the investments recommended by Jonathan I. Bernstein to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. Stringer Asset Management periodically reviews the advisory activities of Jonathan I. Bernstein, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Jonathan I. Bernstein. Additionally, Jonathan Bernstein is a registered representative of Matrix 360 Distributors, LLC.

BROCHURE SUPPLEMENT

March 24, 2017

KENNETH HILL

Stringer Asset Management, LLC

7 Ella Lane
Wayne, NJ 07470
901-800-2956

This Brochure Supplement provides information about Kenneth Hill that supplements the Disclosure Brochure of Stringer Asset Management, LLC (hereinafter “Stringer Asset Management”), a copy of which you should have received. Please contact Stringer Asset Management’s Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Kenneth Hill is available on the SEC’s website at www.adviserinfo.sec.gov.

Stringer Asset Management, LLC, a Registered Investment Adviser

5050 Poplar Avenue, Suite 1103, Memphis, Tennessee 38157

901-800-2956 | www.stringeram.com

Item 2. Educational Background and Business Experience

Born 1959

Post-Secondary Education

Kean University | B.S., Economics | 1982

Recent Business Background

Stringer Asset Management, LLC | Regional Sales Manager | August 2015 – Present

Monte Capital | Sales | January 2015 – August 2015

TS Capital | Sales | August 2014 – January 2015

Equinox Funds | Sales | December 2009 – November 2013

Item 3. Disciplinary Information

Stringer Asset Management is required to disclose information regarding any legal or disciplinary events material to a client's evaluation of Kenneth Hill. Stringer Asset Management has no information to disclose in relation to this Item.

Item 4. Other Business Activities

Stringer Asset Management is required to disclose information regarding any investment-related business or occupation in which Kenneth Hill is actively engaged. Stringer Asset Management has no information to disclose in relation to this Item.

Item 5. Additional Compensation

Stringer Asset Management is required to disclose information regarding any arrangement under which Kenneth Hill receives an economic benefit from someone other than a client for providing investment advisory services. Stringer Asset Management has no information to disclose in relation to this Item.

Item 6. Supervision

Chad Keller, Chief Operating Officer and Chief Compliance Officer, is generally responsible for supervising Kenneth Hill's advisory activities on behalf of Stringer Asset Management. The telephone number to reach Chad Keller is 901-800-2956.

Stringer Asset Management supervises its personnel and the investments made in client accounts. Stringer Asset Management monitors the investments recommended by Jonathan I. Bernstein to ensure they are suitable for the particular client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. Stringer Asset Management periodically reviews the advisory activities of Kenneth Hill, which may include reviewing individual client accounts and correspondence (including e-mails) sent and received by Kenneth Hill. Additionally, Kenneth Hill is a registered representative of Matrix 360 Distributors, LLC.