

# **Avant Capital, LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 6, 2018**

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Avant Capital, LLC (“Avant Capital” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (337) 504-2221.

Avant Capital is a registered investment advisor located in the State of Louisiana. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through Avant Capital to assist you in determining whether to retain the Advisor.

Additional information about Avant Capital and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 167961.

**Avant Capital, LLC**  
**500 Richland Avenue, Lafayette, LA 70508**  
**Phone: (337) 504-2221 \* Fax: (866) 936-7964**  
<http://www.avantcapitalllc.com>

## **Item 2 – Material Changes**

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about Advisory Persons of Avant Capital.

Avant Capital believes that communication and transparency are the foundation of our relationship and continually strive to provide our Clients with the complete and accurate information at all times. We encourage all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

The Advisor now offers 3(21) services; please see "Item 4 – Advisory Services" and "Item 5 – Fees and Compensation" for additional details.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Avant Capital.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 167961. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (337) 504-2221.

### Item 3 – Table of Contents

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<b>Item 1 – Cover Page</b> .....	<b>1</b>
<b>Item 2 – Material Changes</b> .....	<b>2</b>
<b>Item 3 – Table of Contents</b> .....	<b>3</b>
<b>Item 4 – Advisory Services</b> .....	<b>3</b>
A. Firm Information.....	4
B. Advisory Services Offered .....	4
C. Client Account Management .....	5
D. Wrap Fee Programs .....	6
E. Assets Under Management .....	6
<b>Item 5 – Fees and Compensation</b> .....	<b>6</b>
A. Fees for Advisory Services.....	6
B. Fee Billing.....	6
C. Other Fees and Expenses.....	7
D. Advance Payment of Fees and Termination .....	7
E. Compensation for Sales of Securities.....	8
<b>Item 6 – Performance-Based Fees and Side-By-Side Management</b> .....	<b>8</b>
<b>Item 7 – Types of Clients</b> .....	<b>8</b>
<b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss</b> .....	<b>8</b>
A. Methods of Analysis.....	8
B. Risk of Loss .....	8
<b>Item 9 – Disciplinary Information</b> .....	<b>9</b>
<b>Item 10 – Other Financial Industry Activities and Affiliations</b> .....	<b>10</b>
<b>Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b> .....	<b>10</b>
A. Code of Ethics .....	10
B. Personal Trading with Material Interest .....	10
C. Personal Trading in Same Securities as Clients .....	10
D. Personal Trading at Same Time as Client.....	10
<b>Item 12 – Brokerage Practices</b> .....	<b>11</b>
A. Recommendation of Custodian[s].....	11
B. Aggregating and Allocating Trades.....	11
<b>Item 13 – Review of Accounts</b> .....	<b>12</b>
A. Frequency of Reviews .....	12
B. Causes for Reviews.....	12
C. Review Reports .....	12
<b>Item 14 – Client Referrals and Other Compensation</b> .....	<b>12</b>
A. Compensation Received by Avant Capital .....	12
B. Client Referrals from Solicitors .....	13
<b>Item 15 – Custody</b> .....	<b>13</b>
<b>Item 16 – Investment Discretion</b> .....	<b>13</b>
<b>Item 17 – Voting Client Securities</b> .....	<b>13</b>
<b>Item 18 – Financial Information</b> .....	<b>13</b>
<b>Item 19 – Requirements for State Registered Advisors</b> .....	<b>13</b>
A. Educational Background and Business Experience of Principal Officer.....	13
B. Other Business Activities of Principal Officer.....	14
C. Performance Fee Calculations .....	14
D. Disciplinary Information .....	14
E. Material Relationships with Issuers of Securities.....	14
<b>Form ADV Part 2B – Brochure Supplement</b> .....	<b>15</b>
<b>Privacy Policy</b> .....	<b>17</b>

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Avant Capital, LLC (“Avant Capital” or the “Advisor”) is a registered investment advisor located in the State of Louisiana, which is organized as a Limited Liability Company (“LLC”) under the laws of Louisiana. Avant Capital was founded in August 2012, and is owned and operated by Mark A. Avant (Founder and Chief Compliance Officer). Avant Capital became a registered investment advisor in January 2014. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Avant Capital.

The Advisor serves as a fiduciary to Clients, as defined under applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see “Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.”

### **B. Advisory Services Offered**

Avant Capital offers investment advisory services to individuals, high net worth individuals, trusts, estates, and retirement plans in Louisiana and other states (each referred to as a “Client”).

#### Investment Management Services

Avant Capital provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management services.

Avant Capital works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Avant Capital will then construct a customized portfolio for each Client. Client portfolios may consist of mutual funds, exchange-traded funds (“ETFs”), individual equity securities, individual fixed income securities, and/or real estate investment trusts. The Advisor may also utilize investment types and variable insurance products to meet the needs of its Clients. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Avant Capital evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Avant Capital may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Avant Capital may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Avant Capital may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

Avant Capital will provide investment management and related advisory services. At no time will Avant Capital accept or maintain custody of a Client’s funds or securities. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client investment advisory agreement. For additional information, please see “Item 15 – Custody” and “Item 12 – Brokerage Practices.”

#### Retirement Plan Advisory Services

Avant Capital provides non-discretionary advisory services on behalf of retirement plans (each a “Plan”) and the company (the “Plan Sponsor”). The Advisor’s retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan. Each engagement is customized to the needs of the Plan and Plan Sponsor.

Services generally include:

- Plan Advisory Services
- Vendor Analysis
- Enrollment and Education Support
- Investment Policy Statement (“IPS”) Support
- Performance Reports
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Benchmarking Services

Certain of these services are provided by Avant Capital serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of Avant Capital’s fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

#### Managed Account Programs

Avant Capital may recommend to Clients that all or a portion of their portfolio be implemented by utilizing one or more unaffiliated money managers participating in a managed accounts program at the Client’s selected Custodian (the “Program Sponsor”). The Client will then enter into a program and investment advisory agreement with the Program Sponsor and the participating money manager[s]. The Advisor will assist and advise the Client in establishing investment objectives for the account, the selection of the money manager[s], and defining any restrictions on the account[s]. Avant Capital will continue to provide oversight of the Client’s account[s] and ongoing monitoring of the activities of the unaffiliated money managers.

These money managers will develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such services, the Program Sponsor will charge a program fee that includes the investment advisory fee of the money managers, the administration of the program and trading, clearance and settlement costs. The Program Sponsor will add Avant Capital’s investment advisory fee (described below in Item 5) and will deduct the overall fee from the Client’s account[s], generally at the start of each calendar quarter. The asset-based program fee is tiered and varies depending on the size of the account, the asset class of the underlying securities and the sub-advisor selected. The overall fee (including the Advisor’s investment advisory fee) will not exceed 2% annually. **Avant Capital does not receive any compensation from these unaffiliated money managers or the Program Sponsor, other than Avant Capital’s investment advisory fee (described in Item 5).**

The Client, prior to entering into an agreement with a Program Sponsor, will be provided with the Program Sponsor’s Form ADV Part 2A (or a brochure that makes the appropriate disclosures). In addition, Avant Capital and its Client will agree in writing that that selected Program Sponsor will manage the Client’s account[s] on a discretionary basis.

#### **C. Client Account Management**

Prior to engaging Avant Capital to provide investment advisory services, each Client is required to enter into one or more advisory agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Avant Capital, in connection with the Client, will develop an investment strategy targeted to achieve the Client’s investment goals and objectives.
- Asset Allocation – Avant Capital will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Avant Capital will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.

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- Investment Management and Supervision – Avant Capital will provide investment management and ongoing oversight of the Client’s investment portfolio.

**D. Wrap Fee Programs**

Avant Capital does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Avant Capital.

**E. Assets Under Management**

As of December 31, 201, Avant Capital managed approximately \$67,833,790 in discretionary assets and \$335,951 in non-discretionary assets totaling \$68,169,741 in assets under management. Clients may request more current information at any time by contacting the Advisor.

**Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for investment management. Each Client shall sign one or more advisory agreements that detail the responsibilities of Avant Capital and the Client.

**A. Fees for Advisory Services**

Investment Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. Investment advisory fees are based on the following schedule:

Assets Under Management	Annual Rate
Up to \$500,000	1.50%
\$500,001 to \$1,000,000	1.25%
Over \$1,000,000	1.00%

The investment advisory fee in the first quarter of service is prorated to the inception date of the account[s] to the end of the first quarter. Investment advisory fees may be negotiable at the sole discretion of the Advisor. The Client’s fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by Avant Capital will be independently valued by the Custodian. Avant Capital will not have the authority or responsibility to value portfolio securities.

Retirement Plan Advisory Services

Retirement plan advisory fees are paid quarterly, at the end of each calendar quarter, pursuant to the terms of the retirement plan advisory agreement. Fees are charged at an annual rate of up to 1.50% based on the market value of assets in the Plan on the last day of the prior quarter. The Advisor may also offer a fixed annual rate instead of an asset-based fee. Fees are based on the level of Plan assets and the complexity of the services to be provided. Fees are negotiable at the sole discretion of the Advisor and are typically based on the size and complexity of the services provided to the Plan.

Managed Accounts Programs

Fees for Clients participating in managed accounts programs will include Avant Capital’s investment advisory fee above plus the Program Sponsor’s Fee.

**B. Fee Billing**

Investment Management Services

Investment advisory fees will be calculated by the Advisor and deducted from the Client’s account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client’s account[s] at the respective quarter-end date. The amount due is calculated by applying the

quarterly rate (annual rate divided by 4) to the total assets under management with Avant Capital at the end of each calendar quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting Avant Capital to be paid directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

#### Retirement Plan Advisory Services

Retirement plan advisory fees will typically be calculated by the Plan Administrator and automatically deducted from each Plan Participant's account or paid directly by the Plan Sponsor.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than Avant Capital, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian. The investment advisory fee charged by Avant Capital is separate and distinct from these custody and execution fees.

In addition, all fees paid to Avant Capital for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of Avant Capital, but would not receive the services provided by Avant Capital which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Avant Capital to fully understand the total fees to be paid.

### **D. Advance Payment of Fees and Termination**

#### Investment Management Services

Avant Capital is compensated for its investment management services in advance of the quarter in which investment advisory services are rendered. Either party may request to terminate the investment advisory agreement with Avant Capital, at any time, by providing advance written notice to the other party. In addition, the Client may also terminate the agreement within five (5) business days of signing the Advisor's investment advisory agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. Upon termination, the Advisor shall refund any unearned, pre-paid investment advisory fees. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior approval.

#### Retirement Plan Advisory Services

Avant Capital is compensated for its retirement plan advisory services at the end of the calendar quarter in which advisory services are rendered. Either party may terminate the retirement plan advisory agreement, at any time, by providing advance written notice to the other party. In addition, the Client may terminate the agreement within five (5) business days of signing the Advisor's retirement plan advisory agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client shall be responsible for advisory fees up to and including the effective date of termination. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's prior consent.

#### Managed Accounts Programs

Clients participating in a managed accounts program or referred to unaffiliated money managers or investment advisors will be billed in accordance to the investment advisory agreement with the respective Program Sponsor or advisor. Program Sponsors will add Avant Capital's investment advisory fee and deduct the overall fee from the

Client's account[s]. In situations where a Client is referred to an unaffiliated investment advisor, the investment advisor will collect its fee and compensate Avant Capital from this fee.

#### **E. Compensation for Sales of Securities**

Avant Capital does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above. Mr. Avant may receive commissions for the implementation of insurance recommendations (Please see "Item 10 – Other Financial Industry Activities and Affiliations").

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

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Avant Capital does not charge performance-based fees for its investment advisory services. The fees charged by Avant Capital are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

Avant Capital does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

### **Item 7 – Types of Clients**

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Avant Capital offers investment advisory services to individuals, high net worth individuals, trusts, estates, and retirement plans. The relative percentage each type of Client is available on Avant Capital's Form ADV Part 1. These percentages will change over time. Avant Capital generally does not impose a minimum size for establishing a relationship.

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

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#### **A. Methods of Analysis**

Avant Capital employs fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from Avant Capital is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Avant Capital constructs portfolios based on its research. Client portfolios may be customized for each Client. Avant Capital will often hold all or a portion of a security for less than a year. At times, Avant Capital may also buy and sell positions that are very short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class. Please see Item 4 for more details on the Advisor's investment management services.

#### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Avant Capital will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The

Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included in Item 13.

In its technical analysis, Avant Capital seeks to determine the future direction of prices through the study of past market data, primarily price and volume. This is done by charting the movement of investments to identify trends and patterns used in the selection of securities to purchase and price points to buy and sell. Avant Capital uses a various research tools and sites to chart and analyze the movement of various investments. Despite the technical analysis performed by Avant Capital, any investment in securities carries market risk and investors may lose their principal investment.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis. Following are some additional risks for Client's to consider.

#### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

#### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The value of the ETFs will fluctuate with the value of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low volume. Authorized participants in an ETF may change at any time; this may result in change to the liquidity and the ability to redeem the ETF as the authorized participants control the number of shares of the ETF. The value of an ETF fluctuates based upon the market movements and may disassociate from the index being tracked or from the value of the underlying investments. An ETF purchased or sold at one point in the day may have a different value than the same ETF purchased or sold a short time later.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The value of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The value of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same value as a mutual fund purchased later that same day.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

### **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving Avant Capital or any of its Supervised Persons.** Avant Capital and its Advisory Persons value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 167961.

## **Item 10 – Other Financial Industry Activities and Affiliations**

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### Insurance Agency Affiliations

Supervised Persons of Avant Capital are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one's role with Avant Capital. As insurance professionals, our Supervised Persons may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Supervised Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the Advisor or its Supervised Persons.

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

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### **A. Code of Ethics**

Avant Capital has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Avant Capital (our "Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Avant Capital and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Avant Capital Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. Avant Capital has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (337) 504-2221.

### **B. Personal Trading with Material Interest**

Avant Capital allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Avant Capital does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advice an investment company. Avant Capital does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

Avant Capital allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. The Advisor requires reporting of personal securities trades by its Supervised Persons to the Chief Compliance Officer ("CCO"). We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

### **D. Personal Trading at Same Time as Client**

While Avant Capital allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, neither Avant Capital nor any Supervised Persons of Avant Capital will ever transact in any security to the detriment of any Client. Avant Capital will seek to either group its trades together with Client accounts (See Item 12.B.) or place trades after Client orders have been filled.

## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

Avant Capital does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Avant Capital to direct trades to the Custodian as agreed in the investment advisory agreement. Further, Avant Capital does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Avant Capital does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by Avant Capital. Avant Capital may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, reputation, its reputation, and/or the location of the Custodian's offices. Avant Capital does not receive research services, other products, or compensation as a result of recommending a particular custodian that may result in the Client paying higher commissions than those obtainable through other custodians. Avant Capital will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified Custodian". Avant Capital maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab (Please see "Item 14 – Client Referrals and Other Compensation")

Following are additional details regarding the brokerage practices of the Advisor:

- 1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. Avant Capital does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, Avant Capital does receive benefits from Schwab as detailed in "Item 14 – Client Referrals and Other Compensation".
- 2. Brokerage Referrals** - Avant Capital does not receive any compensation from any third party in connection with the recommendation for establishing an account.
- 3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Avant Capital will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Avant Capital will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

### B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Avant Capital will execute its transactions through the Custodian as directed by the Client. Avant Capital may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Investments in Client accounts are monitored on a regular and continuous basis by Mr. Avant, Founder and Chief Compliance Officer of Avant Capital. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Avant Capital if changes occur in his personal financial situation that might adversely affect his investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

## **Item 14 – Client Referrals and Other Compensation**

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### **A. Compensation Received by Avant Capital**

Avant Capital does not receive securities commissions or other compensation from product sponsors or broker-dealers. Avant Capital may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Avant Capital may receive referrals of new Clients from a third party.

#### Participation in Institutional Advisor Platform

Avant Capital has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like Avant Capital. As a registered investment advisor participating on the Schwab Advisor Services platform, Avant Capital receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

*Services that Benefit the Client* – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

*Services that May Indirectly Benefit the Client* – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with

Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

*Services that May Only Benefit the Advisor* – Schwab also offers other services and support to Avant Capital that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. Avant Capital believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

#### **B. Client Referrals from Solicitors**

Avant Capital does not engage paid solicitors for Client referrals.

### **Item 15 – Custody**

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Avant Capital does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian". Clients are required to select the Custodian to retain their funds and securities and direct Avant Capital to utilize the Custodian for the Client's security transactions. Avant Capital encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices."

### **Item 16 – Investment Discretion**

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Avant Capital generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Avant Capital. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Avant Capital will be in accordance with each Client's investment objectives and goals.

### **Item 17 – Voting Client Securities**

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Avant Capital does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

### **Item 18 – Financial Information**

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Neither Avant Capital, nor its management has any adverse financial situations that would reasonably impair the ability of Avant Capital to meet all obligations to its Clients. Neither Avant Capital, nor any of its Advisory Persons, has been subject to a bankruptcy or financial compromise. Avant Capital is not required to deliver a balance sheet along with this Brochure as the firm does not collect advance fees for services to be performed six months or more in advance.

### **Item 19 – Requirements for State Registered Advisors**

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#### **A. Educational Background and Business Experience of Principal Officer**

The Founder of Avant Capital is Mark A. Avant. Information regarding the formal education and background of Mr. Avant is included in Item 2 of his Form ADV Part 2B below.

## **B. Other Business Activities of Principal Officer**

### Insurance Agency Affiliations

Mr. Avant is also a licensed insurance professional. Implementations of insurance recommendations are implemented separate and apart from Mr. Avant's role with Avant Capital. As an insurance professional, Mr. Avant may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Avant is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Avant or the Advisor.

## **C. Performance Fee Calculations**

Avant Capital does not charge performance-based fees for its investment advisory services. The fees charged by Avant Capital are as described in "Item 5 – Fees and Compensation" above and are not based upon the capital appreciation of the funds or securities held by any Client.

## **D. Disciplinary Information**

***There are no legal, civil or disciplinary events to disclose regarding Avant Capital or Mr. Avant.*** Neither Avant Capital nor Mr. Avant has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Avant Capital or Mr. Avant. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Avant Capital or Mr. Avant.***

## **E. Material Relationships with Issuers of Securities**

Neither Avant Capital nor Mr. Avant has any relationships or arrangements with issuers of securities.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Mark A. Avant  
Founder and Chief Compliance Officer**

**Effective: March 6, 2018**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Mark A. Avant (CRD# **2218785**) in addition to the information contained in the Avant Capital, LLC (“Avant Capital” or the “Advisor” - CRD #167961) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avant Capital Disclosure Brochure or this Brochure Supplement, please contact us at (337) 504-2221.

Additional information about Mr. Avant is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

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The Founder and Chief Compliance Officer of Avant Capital is Mr. Mark A. Avant. Mr. Avant, born in 1961, is a to serving Clients of Avant Capital. Additional information regarding Mr. Avant's employment history is included below.

### Employment History:

Founder and Chief Compliance Officer, Avant Capital, LLC (registered investment advisor – 01/2014 – Present)	08/2012 to Present
Insurance Agent, NY Life Securities, Inc.	08/1994 to 01/2014
Investment Advisor Representative, Eagles Strategies LLC	08/2009 to 01/2014
Principal, Avant & Associates, LLC	09/2009 to 01/2014

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Avant.*** Mr. Avant has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Avant. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Avant.*** However, we do encourage you to independently view the background of Mr. Avant on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2218785.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Avant is also a licensed insurance professional. Insurance recommendations are implemented separate and apart from Mr. Avant's role with Avant Capital. As an insurance professional, Mr. Avant may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Avant is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Avant or the Advisor.

## Item 5 – Additional Compensation

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Mr. Avant has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Avant serves as the Founder and Chief Compliance Officer of Avant Capital Mr. Avant can be reached at (337) 504-2221. Avant Capital has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Avant Capital. Further, Avant Capital is subject to regulatory oversight by various agencies. These agencies require registration by Avant Capital and its Supervised Persons. As a registered entity, Avant Capital is subject to examinations by regulators, which may be announced or unannounced. Avant Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Item 7 – Requirements for State Registered Advisors

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Mr. Avant does not have any additional information to disclose.

## Privacy Policy

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Effective: March 6, 2018

### Our Commitment to You

Avant Capital, LLC ("Avant Capital" or the "Advisor") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. Avant Capital (also referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

Avant Capital does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of our relationship with you as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Privacy Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

### What sources do we collect information from in addition to you?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How we share your information?

RIAs do need to share personal information regarding its clients to effectively implement the RIA's services. In the section below, we list some reasons we may share your personal information.

Basis for sharing	Sharing	Limitations
<p><b>Servicing our Clients</b>            We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed services to you consistent with applicable law, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Processing transactions;</li> <li>• General account maintenance;</li> <li>• Responding to regulators or legal investigations; and</li> <li>• Credit reporting, etc.</li> </ul>	<p>Avant Capital may share this information.</p>	<p>Clients cannot limit the Advisor's ability to share.</p>
<p><b>Administrators</b>            We may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.</p>	<p>Avant Capital may share this information.</p>	<p>Clients cannot limit the Advisor's ability to share.</p>
<p><b>Marketing Purposes</b>            Avant Capital does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Avant Capital or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b></p>	<p>Avant Capital does not share personal information.</p>	<p>Clients cannot limit the Advisor's ability to share.</p>
<p><b>Authorized Users</b>            In addition, your non-public personal information may also be disclosed to you and persons we believe to be your authorized agent or representative.</p>	<p>Avant Capital does share personal information.</p>	<p>Clients can limit the Advisor's ability to share.</p>
<p><b>Information About Former Clients</b>            Avant Capital does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.</p>	<p>Avant Capital does not share personal information regarding former clients</p>	<p>Clients can limit the Advisor's ability to share.</p>

How do we protect your information?
<p>To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.</p>
<p>Our employees are advised about Avant Capital's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.</p>
<p>We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third-party agreements.</p>

**Changes to our Privacy Policy.**

We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise our Privacy Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

**Questions:** You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (337) 504-2221.