



## **E Six Thirteen, LLC d/b/a Dunavant Wealth Strategies**

### **Form ADV Part 2A – Disclosure Brochure for Wealth Management Services provided by the Dunavant Wealth Division**

**Effective: April 22, 2016**

This Form ADV2A (“Disclosure Brochure”) provides information about the qualifications and business practices of E Six Thirteen, LLC d/b/a Dunavant Wealth Strategies (herein “Dunavant Wealth” or the “Advisor”). Dunavant Wealth is the Wealth Management division of E Six Thirteen, LLC.

If you have any questions about the contents of this Disclosure Brochure or require information regarding E Six Thirteen, LLC, please contact us at (985) 727-0775.

Dunavant Wealth 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 about Dunavant Wealth to assist you in determining whether to retain the Advisor.

Additional information about Dunavant Wealth and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 158200.

**E Six Thirteen, LLC d/b/a Dunavant Wealth Strategies**  
2895 Highway 190, Suite 232  
Mandeville, LA 70471  
Phone: (985) 727-0775 \* Fax: (985) 727-0740  
[www.dunavantwealth.com](http://www.dunavantwealth.com)

## **Item 2 – Material Changes**

---

Form ADV 2 is divided into two parts: *Part 2A* and *Part 2B*. *Part 2A* (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. *Part 2B* (the “Brochure Supplement”) provides information about advisory personnel of Dunavant Wealth.

Dunavant Wealth believes that communication and transparency are the foundation of its relationship and continually strive to provide our Clients with complete and accurate information at all times. Dunavant Wealth encourages 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 fee breakdown for the Model Wealth Portfolio has been updated, please refer to Item 5 for additional information.

### 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 Dunavant Wealth.

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 for our firm name or by our CRD# 158200. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (985) 727-0775.

### Item 3 – Table of Contents

---

|  |           |
|--|-----------|
| <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>4</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 .....   | 7         |
| 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.....  | 9         |
| B. Risk of Loss.....   | 9         |
| <b>Item 9 – Disciplinary Information</b> .....   | <b>9</b>  |
| <b>Item 10 – Other Financial Industry Activities and Affiliations</b> .....                                  | <b>9</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>11</b> |
| A. Frequency of Reviews .....  | 11        |
| 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 Dunavant Wealth .....  | 12        |
| B. Client Referrals from Solicitors .....  | 12        |
| <b>Item 15 – Custody</b> .....   | <b>12</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.....   | 13        |
| C. Performance Fee Calculations.....   | 14        |
| D. Disciplinary Information .....  | 14        |
| E. Material Relationships with Issuers of Securities.....  | 14        |
| <b>Form ADV 2B - Dunavant, Eric</b> .....  | <b>15</b> |
| <b>Form ADV 2B - Tackett, Sandra</b> .....   | <b>18</b> |
| <br>   |           |
| <b>Privacy Policy</b> .....  | <b>21</b> |

## Item 4 – Advisory Services

---

### A. Firm Information

E Six Thirteen, LLC d/b/a Dunavant Wealth Strategies (herein “Dunavant Wealth” 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. The Advisor was established as a registered investment advisor in 2011 and is owned and operated by Eric L. Dunavant (President). Dunavant Wealth is the wealth management division of E Six Thirteen, LLC.

This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Dunavant Wealth, including comprehensive wealth planning, asset management and targeted financial planning services.

### B. Advisory Services Offered

Dunavant Wealth offers comprehensive wealth planning, asset management and financial consulting services to individuals and families in Louisiana and other states (each referred to as a “Client”). Wealth Management Clients receive initial and ongoing financial planning and investment management services.

#### Investment Management Services

Dunavant Wealth provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. Dunavant Wealth 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. Dunavant Wealth provides unique asset management services to high net worth families and individuals.

Dunavant Wealth constructs portfolios with individual equity securities, exchange-traded funds (“ETFs”), individual fixed income securities and mutual funds to achieve the Client’s investment goals. The Advisor may also utilize real estate investments, alternative investments and managed futures to meet the needs of its Clients. Clients will establish accounts in the Strategic Wealth Management (“SWM”) platform or the SWM II platform (In the SWM II platform, the Advisor absorbs securities transaction fees as detailed in Item 5.B). Smaller Client relationships may also be invested in a mutual fund wrap program called the Optimum Market Portfolio (“OMP”). Portfolio allocations to managed futures, if applicable, are typically implemented through unaffiliated managers in a managed accounts program (See below). Portfolio allocations to real estate and alternative investments, if applicable, may either be implemented along with other portfolio investments or by Mr. Dunavant in his separate capacity as a registered representative (See Item 10).

Dunavant Wealth’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Dunavant Wealth will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

Dunavant Wealth evaluates and selects ETFs and mutual funds for inclusion in Client portfolios only after applying their internal due diligence process. Dunavant Wealth may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Dunavant Wealth 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. Dunavant Wealth 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.

Prior to rendering investment advisory services, Dunavant Wealth will ascertain, in conjunction with the Client, the Client’s financial situation, risk tolerance, and investment objective[s]. Dunavant Wealth will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will Dunavant Wealth accept or maintain custody of a Client’s funds or securities except for the authorized deduction of the Advisor’s fees. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client investment advisory agreement.

### Unaffiliated Money Management

Dunavant Wealth may recommend to Clients that a portion of their portfolio be implemented by utilizing one or more unaffiliated money managers participating in the Model Wealth Portfolio (“MWP”) program, 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. Dunavant Wealth will continue to provide oversight of the Client account 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 Dunavant Wealth’s investment advisory fee (described below in Item 5) and will deduct the overall fee from the Client account, 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 advisor fee) will not exceed 3% annually. **Dunavant Wealth does not receive any compensation from these unaffiliated money managers or the Program Sponsor, other than Dunavant Wealth’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, Dunavant Wealth and its Client will agree in writing that the selected Program Sponsor will manage the Client’s account on a discretionary basis.

### Financial Planning and Consulting Services

Dunavant Wealth will typically provide a variety of financial planning services to individuals and families, pursuant to a written financial planning or consulting agreement, or the Principled Planning agreement. Services are offered in several areas of a Client’s financial situation, depending on their goals, objectives and financial situation. Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation based on the Client’s financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client’s financial situation. The Principled Planning service is a more thorough form of financial planning that covers four phases: assessment, analysis, solutions and implementation through a series of questionnaires and sessions with Dunavant Wealth.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and / or charitable giving programs. Dunavant Wealth may also refer Clients to an accountant, attorney, or other specialist as appropriate for their unique situation. For certain financial planning engagements the Advisor will provide a written summary of Client’s financial situation, observations, and recommendations. For consulting or ad-hoc engagements the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly. Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

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

Prior to engaging Dunavant Wealth to provide investment advisory services, each Client is required to enter into an investment advisory agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client.

These services may include:

- Establishing an Investment Strategy – Dunavant Wealth, in connection with the Client, will develop an investment strategy to assist in achieving the Client’s investment goals and objectives.
- Asset Allocation – Dunavant Wealth 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 – Dunavant Wealth will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Dunavant Wealth will provide investment management and ongoing oversight of the Client’s portfolio and overall account.

**D. Wrap Fee Programs**

Dunavant Wealth does not manage a wrap fee program. For certain Clients, the Advisor may include the securities transaction fees as part of its investment advisory fees above for discretionary trading following the Advisor’s strategies (See SWM II above). Further, at times, Dunavant Wealth may allocate all or a portion of a Client’s account[s] into a managed accounts program (See MWP above), which is structured similar to a wrap fee program (advisory fees, platform fees and transaction costs are rolled into a single fee). Lastly, smaller relationships may be invested in the OMP program, a wrap fee program. Please see Item 4.A above as well as Item 5. Fees and Compensation.

**E. Assets Under Management**

As of December 31, 2015, the Dunavant Wealth division manages \$81,359,852 in assets, all of which are on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

**Item 5 – Fees and Compensation**

---

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign one or more agreements that detail the responsibilities of Dunavant Wealth and the Client.

**A. Fees for Advisory Services**

Financial and Wealth Planning

Initial wealth planning services are provided on a fixed fee basis ranging from \$2,500 to \$15,000 depending on the scope and complexity of the services provided. The Wealth Blue Printing service has four phases that are each provided on a fixed fee basis ranging from \$500 to \$2,000 depending on the scope and complexity of the services provided.

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 preceding calendar quarter.

Investment advisory fees are based on investment program[s] in which the Client’s account[s] are invested and are based on the following schedule:

| Assets Under Management     | Annual Rate (%) |       |
|-----------------------------|-----------------|-------|
|                             | SWM/SWM II/ MWP | OMP   |
| Up to \$1,000,000           | 1.25%           | 1.40% |
| \$1,000,001 to \$3,000,000  | 1.00%           | 1.15% |
| \$3,000,001 to \$5,000,000  | 0.80%           | 0.95% |
| \$5,000,001 to \$15,000,000 | 0.60%           | 0.75% |
| \$15,000,001 and over       | 0.40%           | 0.55% |

Investment advisory fees in the first quarter of service are prorated to the inception date of the account to the end of the first quarter. Fees may be negotiable at the 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 Dunavant Wealth will be independently valued by the designated Custodian. Dunavant Wealth will not have the authority or responsibility to value portfolio securities.



### Unaffiliated Money Management

Fees for Clients participating in managed accounts programs will include Dunavant Wealth's investment advisory fee above, plus the Program Sponsor's Fee.

### Financial Planning and Consulting Services

Dunavant Wealth offers financial planning or consulting services on a fixed fee per plan, or at an hourly rate ranging from \$250 to \$400 per hour. Financial planning or consulting fees are either charged as a single engagement fee or on a quarterly basis, depending on the scope of services and the terms of the Client's agreement with the Advisor. Fees may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total costs will be determined prior to establishing the advisory relationship.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services.

### **B. Fee Billing**

#### Wealth Planning

Wealth planning fees are invoiced by Dunavant Wealth. The Client will be invoiced half of the total amount in advance to initiate a wealth planning engagement. The balance of the wealth planning fees are invoiced upon receipt of the agreed-upon deliverable.

#### Investment Management Services

Investment advisory fees will be calculated by the Advisor and deducted from the Client's account[s] by the Custodian, through the Client's separate agreement with the Custodian. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Dunavant Wealth at the beginning of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory 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 engage the Custodian to calculate and remit payment to the Advisor from their accounts held by the Custodian.

### Financial Planning and Consulting Services

Financial planning and consulting fees for fixed and hourly planning will be invoiced in advance upon execution of the financial planning and consulting agreement the Advisor will not collect fees that are greater than \$500 if the services will be for six months or more in the future. The quarterly planning fee will be invoiced in advance of each calendar quarter. Payments for the first quarter of service will be prorated through the end of the first quarter.

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

Clients may incur certain fees or charges imposed by third parties, other than Dunavant Wealth, in connection with investment made on behalf of the Client's account[s]. For certain Clients, the Advisor may include the securities transaction fees as part of its investment advisory fees above for discretionary trading following the Advisor's strategy. Unless otherwise specified in the investment advisory agreement or other forms with the custodian, the Client shall be responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The investment advisory fee charged by Dunavant Wealth is separate and distinct from these custodian and execution fees. In addition, all fees paid to Dunavant Wealth 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.

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

#### Wealth Planning

Clients will be required to pay an initial retainer of up to 50% of the cost of the engagement to initiate a wealth planning engagement. For a Principled Planning engagement Clients may be required to pay a fixed retainer of the full amount for each phase. In the event that a Wealth Planning Client should wish to cancel the Wealth Planning Agreement, the Client shall be billed for actual hours logged on the planning project times the Advisor's hourly

rate. Any surplus in the Advisor's possession as the result of collecting a deposit at the time of signing the financial planning agreement will be returned to the Client within five (5) business days of cancellation. Either party may terminate a planning or consulting agreement at any time by providing written notice to the other party within five (5) business days of signing the Advisor's financial planning or consulting agreement. 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. Refunds will be given on a pro-rata basis.

#### Investment Management Services

Dunavant Wealth is compensated for its services in advance of the quarter in which investment advisory services are rendered. Either party may request to terminate their investment advisory agreement with Dunavant Wealth, in whole or in part, by providing advance written notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without Client's written approval.

#### Unaffiliated Money Management

In the event that a Client should wish to terminate their relationship with a managed accounts program or unaffiliated investment advisor, the terms for termination will be set forth in the respective agreements between the Client and those third parties. Dunavant Wealth will assist the Client with the termination and transition as appropriate.

#### Financial Planning and Consulting Services

Financial planning Clients may be required to pay an initial retainer of up to 50% of the expected cost of a financial planning or consulting engagements. For quarterly planning, Clients may be required to pay a pro-rated amount from the effective date of the first quarter. In the event that a Client should wish to cancel the financial planning agreement under which any plan is being created, the Client shall be billed for actual hours logged on the planning project times the agreed-upon hourly rate. Any surplus in the Advisor's possession as the result of collecting a deposit at the time of signing the financial planning agreement will be returned to the Client within five (5) business days of cancellation.

Either party may terminate a planning or consulting agreement at any time by providing written notice to the other party within five (5) business days of signing the Advisor's financial planning or consulting agreement. 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. Refunds will be given on a pro-rata basis.

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

Dunavant Wealth 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.

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

---

Dunavant Wealth does not charge performance-based fees for its investment advisory services. The fees charged by Dunavant Wealth 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. Dunavant Wealth 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**

---

Dunavant Wealth offers comprehensive wealth planning, asset management and financial consulting services to individuals and families in Louisiana and other states. The relative percentage of each type of Client is available on the Advisor's Form ADV Part 1. These percentages will change over time. Dunavant Wealth generally does not impose a minimum account size for establishing an asset management. For Principled Planning Complex, Dunavant Wealth requires a minimum initial wealth-planning fee of \$3,500. For Principled Planning Basic services Dunavant Wealth requires a minimum initial retainer of \$1,500 per phase. Dunavant Wealth has a minimum account size of \$250,000 per household, this minimum may be waived at the sole discretion of the Advisor.



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

---

### A. Methods of Analysis

Dunavant Wealth primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from Dunavant Wealth 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.

As noted above, Dunavant Wealth generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Dunavant Wealth will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Dunavant Wealth may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and / or the fundamentals of the security, sector or asset class.

### 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. Dunavant Wealth 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 is included in Item 13.

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.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. **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.**

### Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks.

## Item 9 – Disciplinary Information

---

**There are no legal, regulatory or disciplinary events involving Dunavant Wealth or any of its employees.** Dunavant Wealth and its advisory personnel 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 for our firm name or by our CRD# 158200.

## Item 10 – Other Financial Industry Activities and Affiliations

---

E Six Thirteen, LLC d/b/a Dunavant Wealth Strategies  
2895 Highway 190, Suite 232 \* Mandeville, LA 70471  
Phone: (985) 727-0775 \* Fax: (985) 727-0740  
[www.dunavantwealth.com](http://www.dunavantwealth.com)

---

### Broker-Dealer Affiliation

Certain Supervised Person(s) are also a registered representative of LPL Financial LLC, a registered broker-dealer (CRD No. 6413), member FINRA, SIPC (herein "LPL"). In their separate capacity as a registered representative, Supervised Person(s) will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the Supervised Person(s). Neither the Advisor nor the Supervised Person(s) will earn investment advisory fees in connection with any services implemented in the Supervised Person's separate capacity as a registered representative where commissions are earned. In no circumstances will Dunavant Wealth earn an advisory fee and a commission on the same investment. In the event that the Supervised Person(s) earns a commission on an investment, the asset management fee will be waived by Dunavant Wealth.

### Insurance Agency Affiliations

Mr. Dunavant, President of the Advisor, is also a licensed insurance professional. This business activity is performed separate and apart from his role with the Advisor. As an insurance professional, Mr. Dunavant may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset financial planning fees paid to the Advisor. 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. Dunavant or the Advisor. Mr. Dunavant spends less than 5% of his business time on this activity.

---

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

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

Dunavant Wealth has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Dunavant Wealth (our "Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Dunavant Wealth and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Dunavant Wealth associates 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 address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (985) 727-0775.

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

Dunavant Wealth allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Dunavant Wealth 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. Dunavant Wealth does not have a material interest in any securities traded in Client accounts.

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

Dunavant Wealth 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. 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.

In addition the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

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

Dunavant Wealth allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. The Advisor and its affiliated persons often trade alongside its Clients and will often include trades for the accounts of affiliated persons at the same time as its Clients. **At no**

time, will Dunavant Wealth or any Supervised Persons of Dunavant Wealth, transact in any security to the detriment of any Client.

## Item 12 – Brokerage Practices

---

### A. Recommendation of Custodian[s]

Dunavant Wealth does not have discretionary authority to select the broker-dealer / custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "Custodian") to safeguard Client assets and authorize Dunavant Wealth to direct trades to this Custodian as agreed in the investment advisory agreement. Further, Dunavant Wealth does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Dunavant Wealth does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for execution and /or custodial services. Clients are not obligated to use the recommended Custodian and will not incur any extra fee or cost associated with using a broker not recommended by Dunavant Wealth. Dunavant Wealth may recommend a Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the Custodian's offices. Dunavant Wealth does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers. Dunavant Wealth may generally recommend that Clients establish their account[s] with LPL Financial, where Mr. Dunavant services as a registered representative and Dunavant Wealth has an institutional advisor relationship. Following are additional details regarding the brokerage practices of the Advisor:

- 1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **Dunavant Wealth does not participate in soft dollar programs sponsored or offered by any broker-dealer.**
- 2. Brokerage Referrals** - Dunavant Wealth does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.
- 3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Dunavant Wealth 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]). In selecting the Custodian, Dunavant Wealth 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 designated 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 broker. Dunavant Wealth will execute its transactions through an unaffiliated broker-dealer selected by the Client. Dunavant Wealth may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer 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

---

### A. Frequency of Reviews

Investments in Client accounts in Client accounts are monitored on a regular and continuous basis by Mr. Dunavant, President of the Advisor. 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. The Client is encouraged to notify Dunavant Wealth if changes occur in his/her personal financial situation that might adversely affect his/her 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 trustee or 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**

### **A. Compensation Received by Dunavant Wealth**

#### Broker-Dealer Affiliation

Mr. Dunavant is also an investment advisor representative and registered representative of LPL Financial. In his separate capacity as a registered principal, Mr. Dunavant will typically receive commissions for the implementation of recommendations for commissionable transactions. Additional details are included in Item 10 above.

#### Insurance Agency Affiliations

Mr. Dunavant, President of Dunavant Wealth, may serve as sales agent for various insurance companies. As an insurance agent, Mr. Dunavant may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Additional details are included in Item 10 above.

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

Dunavant Wealth does not engage paid solicitors for Client referrals.

---

## **Item 15 – Custody**

Dunavant Wealth 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 their own custodian to retain their funds and securities and direct Dunavant Wealth to utilize that custodian for the Client's security transactions. Dunavant Wealth encourages Clients to review statements provided by account custodian. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices".

## Item 16 – Investment Discretion

---

Dunavant Wealth 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 Dunavant Wealth. 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 Dunavant Wealth will be in accordance with each Client's investment objectives and goals.

## Item 17 – Voting Client Securities

---

Dunavant Wealth does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements and supporting information directly from the Custodian. If questions arise, Dunavant Wealth may assist in answering questions, but cannot accept proxy-voting responsibility.

## Item 18 – Financial Information

---

Neither Dunavant Wealth, nor its management, have any adverse financial situations that would reasonably impair the ability of Dunavant Wealth to meet all obligations to its Clients. Neither Dunavant Wealth, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Dunavant Wealth is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$500 for services to be performed six months or more in advance.

## Item 19 – Requirements for State Registered Advisors

---

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

The President of Dunavant Wealth is Eric L. Dunavant. Mr. Dunavant, born in 1973, is also the Chief Compliance Officer of the Advisor. Mr. Dunavant earned a B.S. - Agribusiness from Texas A&M University in College Station, TX in 1996. Additional information regarding Mr. Dunavant's employment history is included below.

#### Employment History:

|  |                    |
|--|--------------------|
| President, E Six Thirteen, LLC                       | 06/2011 to Present |
| Registered Representative, LPL Financial LLC         | 11/2007 to Present |
| Investment Advisor Representative, LPL Financial LLC | 11/2007 to 10/2011 |
| Registered Representative, Charles Schwab & Co, Inc. | 06/1999 to 11/2007 |

### B. Other Business Activities of Principal Officer

#### Broker-Dealer Affiliation

Mr. Dunavant is also a registered representative of LPL Financial LLC, a registered broker-dealer (CRD No. 6413), member FINRA, SIPC (herein "LPL"). In his separate capacity as a registered representative, Mr. Dunavant will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Dunavant. Neither the Advisor nor Mr. Dunavant will earn investment advisory fees in connection with any services implemented in Mr. Dunavant's separate capacity as a registered representative where commissions are earned. In no circumstances will Dunavant Wealth earn an advisory fee and a commission on the same investment. In the event that Mr. Dunavant earns a commission on an investment, the asset management fee will be waived by Dunavant Wealth. Mr. Dunavant spends less than 15% of his business time on this activity.

#### Insurance Agency Affiliations

Mr. Dunavant, President of the Advisor, is also a licensed insurance professional. This business activity is performed separate and apart from his role with the Advisor. As an insurance professional, Mr. Dunavant may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset financial planning fees paid to the Advisor. 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. Dunavant or the Advisor. Mr. Dunavant spends less than 5% of his business time on this activity.

#### Board Member

Mr. Dunavant is also serves on the Board of Trustees for the St. Tammany Parish Hospital Foundation.

#### **C. Performance Fee Calculations**

Dunavant Wealth does not charge performance-based fees for its investment advisory services. The fees charged by Dunavant Wealth 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 Dunavant Wealth or Mr. Dunavant.* Neither Dunavant Wealth nor Mr. Dunavant has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Dunavant Wealth or Mr. Dunavant. 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 Dunavant Wealth or Mr. Dunavant.*

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

Neither Dunavant Wealth nor Mr. Dunavant has any relationships or arrangements with issuers of securities.





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

**for**

**Eric L. Dunavant  
President**

**Effective: April 22, 2016**

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Eric L. Dunavant (CRD# 3255295) in addition to the information contained in the E Six Thirteen, LLC d/b/a Dunavant Wealth Strategies (“Dunavant Wealth” or the “Advisor”) Disclosure Brochure (contained herein). If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or Dunavant Wealth’s Disclosure Brochure, please contact us at (985) 727-0775.

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

---

E Six Thirteen, LLC d/b/a Dunavant Wealth Strategies  
2895 Highway 190, Suite 232 \* Mandeville, LA 70471  
Phone: (985) 727-0775 \* Fax: (985) 727-0740  
[www.dunavantwealth.com](http://www.dunavantwealth.com)

## Item 2 – Educational Background and Business Experience

---

The President of Dunavant Wealth is Eric L. Dunavant. Mr. Dunavant, born in 1973. Mr. Dunavant earned a B.S. - Agribusiness from Texas A&M University in College Station, TX in 1996. Additional information regarding Mr. Dunavant's employment history is included below.

### Employment History:

|  |                    |
|--|--------------------|
| President, E Six Thirteen, LLC                       | 06/2011 to Present |
| Registered Representative, LPL Financial LLC         | 11/2007 to Present |
| Investment Advisor Representative, LPL Financial LLC | 11/2007 to 10/2011 |
| Registered Representative, Charles Schwab & Co, Inc. | 06/1999 to 11/2007 |

## Item 3 – Disciplinary Information

---

**There are no legal, civil or disciplinary events to disclose regarding Mr. Dunavant.** Mr. Dunavant 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. Dunavant. 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. Dunavant.** However, we do encourage you to independently view the background of Mr. Dunavant on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) [by searching his name or his CRD# 3255295](#).

## Item 4 – Other Business Activities

---

### Broker-Dealer and Investment Advisor Affiliation

Mr. Dunavant is also a registered representative of LPL Financial LLC, a registered broker-dealer (CRD No. 6413), member FINRA, SIPC (herein "LPL"). In his separate capacity as a registered representative, Mr. Dunavant will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Dunavant.

Neither the Advisor, nor Mr. Dunavant, will earn investment advisory fees in connection with any services implemented in Mr. Dunavant's separate capacity as a registered representative where commissions are earned. In no circumstances will E Six Thirteen earn an advisory fee and a commission on the same investment. In the event that Mr. Dunavant earns a commission on an investment, the advisory fee will be waived by E Six Thirteen. Mr. Dunavant spends less than 15% of his business time on this activity.

### Insurance Agency Affiliations

Mr. Dunavant, President of the Advisor, is also a licensed insurance professional. This business activity is performed separate and apart from his role with E Six Thirteen. As an insurance professional, Mr. Dunavant may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset financial planning fees paid to E Six Thirteen.

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. Dunavant or the Advisor. Mr. Dunavant spends less than 5% of his business time on this activity.

### Board Member

Mr. Dunavant is also serves on the Board of Trustees for the St. Tammany Parish Hospital Foundation.

## Item 5 – Additional Compensation

---

Mr. Dunavant has additional business activities were compensation is received, which are detailed in Item 4 above.

## **Item 6 – Supervision**

---

Mr. Dunavant serves as the President of Dunavant Wealth and is supervised by Sandra Tackett, the Chief Compliance Officer. Ms. Tackett can be reached at (985) 727-0775.

Dunavant Wealth has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Dunavant Wealth. Further, Dunavant Wealth is subject to regulatory oversight by various agencies. These agencies require registration by Dunavant Wealth and its employees. As a registered entity, Dunavant Wealth is subject to examinations by regulators, which may be announced or unannounced. Dunavant Wealth 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**

---

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



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

for

**Sandra E. Tackett**  
**Chief Compliance Officer and Executive Operations Manager**

**Effective: April 22, 2016**

This This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Sandra E. Tackett (CRD# 5477280) in addition to the information contained in the E Six Thirteen, LLC d/b/a Dunavant Wealth Strategies (“Dunavant Wealth” or the “Advisor”) (CRD # 158200) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Dunavant Wealth Disclosure Brochure or this Brochure Supplement, please contact us at (985) 727-0775.

Additional information about Ms. Tackett 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

---

Sandra E. Tackett is the Chief Compliance Officer and Executive Operations Manager of Dunavant Wealth. Ms. Tackett, born in 1967, is dedicated to advising Clients of Dunavant Wealth. Ms. Tackett earned a Bachelor of Science in Business Administration from McNeese State University in 1992. Additional information regarding Ms. Tackett's employment history is included below.

### Employment History:

|   |                    |
|---|--------------------|
| Chief Compliance Officer and Executive Operations Manager, E Six Thirteen, LLC (06/2014 to Present) | 01/2008 to Present |
| Executive Operations Manager, E Six Thirteen, LLC (01/2008 to Present)                              |                    |
| Registered Representative, LPL Financial LLC  | 01/2008 to Present |
| Administrative Assistant, First Baptist Church  | 08/2004 to 01/2008 |

## Item 3 – Disciplinary Information

---

**There are no legal, civil or disciplinary events to disclose regarding Ms. Tackett.** Ms. Tackett has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Tackett. 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 Ms. Tackett.** However, we do encourage you to independently view the background of Ms. Tackett on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching her name or her CRD# 5477280.

## Item 4 – Other Business Activities

---

### Broker-Dealer Affiliation

Ms. Tackett is also a registered representative of LPL Financial LLC, a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In her separate capacity as a registered representative, Ms. Tackett will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Ms. Tackett. Neither the Advisor nor Ms. Tackett will earn investment advisory fees in connection with any services implemented in Ms. Tackett's separate capacity as a registered representative where commissions are earned.

Generally, recommendations made by Dunavant Wealth to its Clients are implemented by Ms. Tackett in her role as an Chief Compliance Officer and Executive Operations Manager, not in her role as a Registered Representative. As such, Clients of Dunavant Wealth will only pay advisory fees as described above. In no circumstances will Dunavant Wealth earn an advisory fee and a commission on the same investment. In the event that Ms. Tackett earns a commission on an investment, the advisory fee will be waived by Dunavant Wealth.

### Notary Public

Ms. Tackett, in her separate capacity, is licensed as a notary public in the State of Louisiana. Clients may engage Ms. Tackett as a notary public and will be charged a separate fee from her role with Dunavant Wealth.

## Item 5 – Additional Compensation

---

Ms. Tackett has additional business activities where compensation is received, which are detailed in Item 4 above.

## Item 6 – Supervision

---

Ms. Tackett serves as the Chief Compliance Officer and Executive Operations Manager of Dunavant Wealth. Ms. Tackett can be reached at (985) 727-0775.

Dunavant Wealth has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Dunavant Wealth. Further, Dunavant Wealth is subject to regulatory oversight by various agencies. These agencies require registration by Dunavant Wealth and its employees. As a registered entity, Dunavant Wealth is subject to examinations by regulators, which may be announced or unannounced. Dunavant Wealth 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**

---

Ms. Tackett does not have any additional information to disclose.



## Privacy Policy

---

Effective: April 22, 2016

### Our Commitment to You

E Six Thirteen, LLC d/b/a Dunavant Wealth (“Dunavant Wealth” or the “Advisor”) is committed to safeguarding the use of your personal information that we have as your Investment Advisor. Dunavant Wealth (referred to as “we”, “our” and “us”) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. 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.

We do not sell your non-public personal information to anyone. Nor does Dunavant Wealth provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account 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.

### The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

|   |                                  |
|---|----------------------------------|
| • Name and address                                  | • Assets                         |
| • E-mail address                                    | • Income                         |
| • Phone number                                      | • Account balance                |
| • Social security or taxpayer identification number | • Investment activity            |
|   | • Accounts at other institutions |

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

### Information About You That Dunavant Wealth Shares

Dunavant Wealth works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy Dunavant Wealth’s regulatory obligations, and is otherwise required or permitted by law. Lastly, 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.

**To repeat, we do not sell your non-public personal information to anyone.**

### Information About Former Clients

Dunavant Wealth 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.

**Confidentiality and Security**

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

**We'll Keep You Informed**

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. You may obtain a copy of our current privacy policy by contacting us at (985) 727-0775.