

Firm Brochure

(Part 2A of Form ADV)

KULT WEALTH MANAGEMENT GROUP, LLC

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This brochure provides information about the qualifications and business practices of Kult Wealth Management Group, LLC. If you have any questions about the contents of this brochure, please contact us at: 262-787-0704, or by email at: peter.kult@kultwealth.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Kult Wealth Management Group, LLC is available on the SEC's website at www.adviserinfo.sec.gov

March 29, 2011

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 262-787-0704 or by email at: peter.kult@kultwealth.com.

Table of Contents

Material Changes.....	i
Annual Update	i
Material Changes since the Last Update	i
Full Brochure Available	i
Advisory Business	1
Firm Description.....	1
Principal Owners.....	1
Types of Advisory Services.....	1
Tailored Relationships	2
Investment Management Service Agreement	2
Fee Billing	2
Asset Management	2
Types of Clients.....	2
Description	2
Account Minimums.....	3
Methods of Analysis, Investment Strategies and Risk of Loss.....	3
Methods of Analysis.....	3
Investment Strategies	3
Risk of Loss	3
Disciplinary Information	4
Legal and Disciplinary.....	4
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	4
Code of Ethics.....	4
Participation or Interest in Client Transactions.....	4
Personal Trading.....	5
Brokerage Practices.....	5
Selecting Brokerage Firms.....	5
Soft Dollars	5
Order Aggregation	5

Review of Accounts	5
Periodic Reviews	5
Review Triggers	5
Regular Reports.....	5
Client Referrals and Other Compensation	6
Incoming Referrals.....	6
Referrals Out.....	6
Custody	6
Account Statements	6
Performance Reports.....	6
Investment Discretion	6
Discretionary Authority for Trading.....	6
Limited Power of Attorney	6
Voting Client Securities	7
Proxy Votes	7
Financial Information	7
Financial Condition	7
Information Security Program.....	7
Information Security	7
Privacy Notice	7
Brochure Supplement (Part 2B of Form ADV)	9
Professional Certifications	9
Peter M. Kult	9

Advisory Business

Firm Description

Kult Wealth Management Group, LLC, (“Kult Wealth”) was founded in 2003.

Kult Wealth provides personalized investment management to individuals. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Kult Wealth is strictly a fee-only investment management firm. The firm does not receive commissions for purchasing or selling annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder’s fees are accepted.

Kult Wealth does not act as a custodian of client assets. Kult Wealth places trades for clients under a limited power of attorney.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be made by telephone or e-mail, is free of charge and is considered an exploratory interview to determine the extent to which investment management may be beneficial to the client.

Principal Owners

Peter M. Kult is 100% owner of Kult Wealth.

Types of Advisory Services

Kult Wealth provides investment supervisory services, also known as asset management services.

On more than an occasional basis, Kult Wealth furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

As of March 29, 2011, Kult Wealth manages approximately \$41 million in assets for approximately 49 clients. Approximately \$33 million is managed on a discretionary basis, and \$8 million is managed on a non-discretionary basis.

Tailored Relationships

The goals and objectives for each client are discussed at the outset of each client relationship. Each client is then periodically kept abreast of his or her asset allocation.

Agreements may not be assigned without client consent.

Investment Management Service Agreement

Kult Wealth's annual investment management fee is based on a percentage of the investable assets according to the following schedule:

- .75% on the first \$1 million;
- .50% on the next \$1,000,000; and
- .25% on the assets above \$2,000,000.

Fees are non-negotiable. Although the investment management agreement is an ongoing agreement, the length of service to the client is at the client's discretion. The client or the investment manager may terminate the agreement at any time. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed.

Fee Billing

Investment management fees are billed quarterly, in arrears, meaning that our fees are deducted after the three-month billing period has ended. The client must consent in advance to direct debiting of their investment account.

Asset Management

Assets are invested primarily in exchange-traded funds (sometimes referred to as "ETFs") and no-load mutual funds through a discount broker. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. Kult Wealth does not receive any compensation, in any form, from fund companies or brokerage firms.

Types of Clients

Description

Kult Wealth generally provides investment advice to individuals.

Account Minimums

The minimum account size is \$500,000 of assets under management, which equates to an annual fee of \$3,750.

Kult Wealth has the discretion to waive the account minimum. Accounts of less than \$500,000 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total to \$500,000 within a reasonable time. Other exceptions may apply to employees of Kult Wealth and their relatives, or relatives of existing clients.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation implemented via passively-managed index investments and actively-managed funds. Portfolios are generally globally diversified in an effort to control the risk associated with investment markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk may be caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the US dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

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

Code of Ethics

The employees of Kult Wealth have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

Kult Wealth and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the Kult Wealth *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of Kult Wealth is Peter Kult. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment.

Brokerage Practices

Selecting Brokerage Firms

Kult Wealth does not have any affiliation with product sales firms. Kult Wealth recommends custodians based on the proven integrity and financial responsibility of the firm and the execution of orders at reasonable commission rates.

Kult Wealth recommends discount brokerage firms such as TD Ameritrade Institutional. Kult Wealth does not receive fees or commissions from any of these arrangements.

Soft Dollars

Kult Wealth does not receive any indirect payments from any service providers such as TD Ameritrade Institutional.

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

Review of Accounts

Periodic Reviews

Account reviews are performed quarterly by Peter Kult. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Regular Reports

Clients generally receive periodic communications on at least a quarterly basis. The written updates may include a portfolio statement and a summary of progress towards meeting the client's long-term objectives.

Client Referrals and Other Compensation

Incoming Referrals

Kult Wealth receives referrals from current clients, estate planning attorneys, accountants, personal friends and other similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

Kult Wealth does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Custody

Account Statements

All assets are held at qualified custodians such as TD Ameritrade Institutional, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the statements provided by Kult Wealth.

Investment Discretion

Discretionary Authority for Trading

Kult Wealth accepts discretionary authority to manage accounts on behalf of clients. Kult Wealth has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, Kult Wealth consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the asset allocation policy that you have approved.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

Voting Client Securities

Proxy Votes

Kult Wealth does not vote proxies on securities. Clients are expected to vote their own proxies.

Financial Information

Financial Condition

Kult Wealth does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Kult Wealth does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$600 per client, and six months or more in advance.

Information Security Program

Information Security

Kult Wealth maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

As a client of Kult Wealth, you have entrusted us with not only your wealth but also with personal and financial information about you. We treat this information as confidential and recognize the importance of protecting access to it.

When you became a client of Kult Wealth, you provided us with personal information including your name and address, social security number, assets, income, account balances, bank account information, personal tax information and investment activity, most of which is nonpublic information.

We do not sell information about you (or former clients) to third parties, and we do not disclose it to third parties unless necessary to process a transaction or service an account. For example, when transferring assets from another financial institution to TD Ameritrade (to be managed by Kult Wealth), we (or TD Ameritrade) provide certain information about you to that company in order to complete the transaction. The only exceptions to this rule are if you request us to disclose information about you to third parties, or if we are required to disclose information about you by law.

To protect your personal information, we maintain physical and electronic safeguards including locked offices, file cabinets, and desks when we are out of the office, and password-protected computers. Our Privacy Policy, which

applies to all employees, requires that your personal information be held in strict confidence.

As required by federal law, we will notify you of our privacy policy annually. In addition, we will tell you promptly if we change this policy. Should you have any questions regarding our privacy policy, please contact us at 262-787-0704.

Brochure Supplement (Part 2B of Form ADV)

Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (CFP): Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

Peter M. Kult

- Year of Birth: 1971
- Professional Credentials: Certified Financial Planner (CFP)
Certified Public Accountant (CPA)
- Post-High School Education: Marquette University '93– BS-Accounting
- Business Background: McCarthy Kult Financial Group, LLC – '00 to '03
Arthur Andersen LLP – '99 to '00
McCarthy Financial Management – '98 to '99
Price Waterhouse LLP – '93 to '98