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**FORM ADV PART 2A.  
BROCHURE**

**This brochure provides information about the qualifications and business practices of Kades Financial Inc. If you have any questions about the contents of this brochure, please contact us at 610-834-1504. 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 Kades Financial Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Kades Financial Inc. is 111131.**

**Kades Financial Inc. is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.**

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***Advisory Business***

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Kades Financial Inc.'s registration was granted by the U.S. Securities and Exchange Commission on August 31, 1998. Howard Andrew Kades (CRD Number 2321734) is President, Chief Compliance Officer and sole equity owner of the firm. The firm is not publicly owned or traded. There are no indirect owners of the firm or intermediaries who have any ownership interest in the firm. The firm manages each client's portfolio on an individualized basis. Clients may impose restrictions on their accounts. The firm does not participate in wrap programs. As of December 31, 2013, the firm managed assets on a discretionary basis in the amount of \$171,881,300, representing 234 accounts.

Firm shall devote approximately ninety-five (95%) percent of its professional time to the provision of investment supervisory services. Specifically, firm will engage in asset management services.

Firm shall devote approximately five (5%) percent of its professional time to fee based financial planning services. Firm elicits pertinent financial information from the client and then, based on an analysis of such financial information, develops a financial plan on behalf of the financial planning client.

## *Fees and Compensation*

Form ADV Part 2A, Item 5

The asset management fee is based on the following tiered schedule:

Assets Under Management	Annual Fee
First \$500,000	1.00%
Next \$500,000	0.80%
Above \$1,000,000	0.60%

We have a minimum quarterly fee of \$250.00.

Fees are payable quarterly in arrears. The fee schedule is tiered, with accounts larger than \$500,000 having a blended fee rate. For example, an account worth \$1,500,000 would have a blended rate of 0.80%, with the first \$500,000 billed at 1.00%, the next \$500,000 being billed at 0.80%, and the last \$500,000 being billed at 0.60%. All fees are negotiable. Fees may be taken directly from a client's custodial account. Full compliance with 17 CFR Regulation Section 275.206 (4)-2 shall be maintained at all times so as to not trigger custody. Specifically, 1. The advisory client provides a written authorization permitting the adviser's fees to be paid directly from the client's account, held by an independent custodial firm or trustee. 2. The adviser sends the client and the custodial firm or trustee at the same time a bill showing the amount of the fee, the value of the client's assets on which the fee was based, and the specific manner in which the adviser's fee was calculated. 3. The custodial firm or trustee agrees to send to the client a statement, at least quarterly, indicating all amounts dispersed on the account including the amount of advisory fees paid direction to the adviser.

Clients receiving advice about no load mutual funds are always told that there will be two levels of fees involved (called layering) that is a fee payable to firm and a fee payable to the fund manager.

Firm charges financial planning clients at an hourly rate from \$200 to \$300 depending on the circumstances of the case and depending on the anticipated complexity of the case. Firm reserves the option of offering hourly services and receiving fees for a specific service. This fee is negotiable. Compensation is payable upon completion of the financial plan. The relationship may be terminated at any time and all unearned and/or unapplied fees will be refunded at once to the client.

***Performance-Based Fees and Side-By-Side Management***

Form ADV Part 2A, Item 6

None.

***Types of Clients***

Form ADV Part 2A, Item 7

Individuals, pension plans profit sharing plans trusts, estates, charitable organizations, corporations and other business entities.

***Methods of Analysis, Investment Strategies and Risk of Loss***

Form ADV Part 2A, Item 8

Method of securities analysis is fundamental analysis.

Investment strategies used are long term purchases (securities held at least a year) and short term purchases (securities sold within a year).

***Disciplinary Information***

Form ADV Part 2A, Item 9

None.

***Other Financial Industry Activities and Affiliations***

Form ADV Part 2A, Item 10

Lawrence Kades receives compensation in the form of residual commission income from insurance product sales that he earned when he was insurance licensed.

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

Form ADV Part 2A, Item 11

Firm has adopted a written Code of Ethics in compliance with SEC Rule 204A-1. The Code sets forth standards of conduct and requires compliance with federal securities laws. Our code also addresses personal trading and requires our personnel to report their personal securities holdings and transactions to the Chief Compliance Officer of the firm. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

It is further noted that Firm is in and shall continue to be in total compliance with The Insider Trading and Securities Fraud Enforcement Act of 1988. Specifically, Firm has adopted a firm wide policy statement outlining insider trading compliance by Firm and its associated persons and other employees. This statement has been distributed to all associated persons and other employees of Firm and has been signed and dated by each such person. A copy of such firm wide policy is left with such person and the original is maintained in a master file. Further, Firm has adopted a written supervisory procedures statement highlighting the steps which shall be taken to implement the firm wide policy. These materials are also distributed to all associated persons and other employees of Firm, are signed, dated and filed with the insider trading compliance materials. There are provisions adopted for (1) restricting access to files, (2) providing continuing education, (3) restricting and/or monitoring trading on those securities of which Firm's employees may have non public information, (4) requiring all of Firm's employees to conduct their trading through a specified broker or reporting all transactions promptly to Firm, and (5) monitoring the securities trading of the firm and its employees and associated persons.

Firm or individuals associated with Firm may buy or sell securities identical to those recommended to customers for their personal account.

It is the express policy of Firm that no person employed by Firm may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts.

Firm or any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

As these situations may represent a conflict of interest, Firm has established the following restrictions in order to ensure its fiduciary responsibilities:

- 1) A director, officer or employee of Firm shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No person of Firm shall prefer his or her own interest to that of the advisory client.
- 2) Firm maintains a list of all securities holdings for itself, and anyone associated with this advisory practice. These holdings are reviewed on a regular basis by Howard Kades, Chief Compliance Officer.
- 3) Firm requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.
- 4) Any individual not in observance of the above may be subject to termination

### ***Brokerage Practices***

Form ADV Part 2A, Item 12

Kades Financial Inc. does not have the discretionary authority to select the broker to use for client transactions, nor to determine the commission rates to be paid. Kades Financial Inc. participates in Charles Schwab & Co.'s Financial Advisors Service Program offered to independent investment advisers by Charles Schwab & Company, Inc., a FINRA registered broker dealer.

Clients in need of brokerage and custodial services will have Charles Schwab & Company recommended to them. As part of the Financial Advisors Service Program, Kades Financial Inc. receives benefits that it would not receive if it did not offer investment advice.

Many clients, when undertaking an advisory relationship, may already have a pre-established relationship with a broker and they will instruct Kades Financial Inc. to execute all transactions through that broker. In the event that a client directs Kades Financial Inc. to use a particular broker or dealer, it should be understood that under those circumstances Kades Financial Inc. will not have authority to negotiate commissions to obtain volume discounts and best execution may not be achieved. In addition, under these circumstances, a disparity in commission charges may exist between the commissions charged to other clients.

Kades Financial Inc. may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, Member SIPC/NYSE, to maintain custody of clients' assets and to effect trades for their accounts. Schwab Institutional provides Kades Financial Inc. with access to its institutional trading and operations services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers at no charge to them so long as a total of at least \$10 million of the advisor's clients' account assets are maintained at Schwab Institutional. Schwab Institutional's services include research, brokerage, custody, access to mutual funds and other investments that are otherwise available only to institutional investors or would require a significantly higher minimum initial investment. Schwab Institutional also makes available to Kades Financial Inc. other products and services that benefit Kades Financial Inc. but may not benefit its clients' accounts. Some of these other products and services assist Kades Financial Inc. in managing and administering

clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of Kades Financial Inc.'s fees from its clients accounts, and assist with back-office support, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of Kades Financial Inc.'s accounts, including accounts not maintained at Schwab Institutional. Schwab Institutional may also provide Kades Financial Inc. with other services intended to help Kades Financial Inc. manage and further develop its business enterprise. These services may include consulting, publications and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, Schwab may make available, arrange and/or pay for these types of services to Kades Financial Inc. by independent third-parties. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third party providing these services to Kades Financial Inc..

The availability to Kades Financial Inc. of the foregoing products and services is not contingent upon Kades Financial Inc. committing to Schwab Institutional any specific amount of business (assets in custody or trading).

### ***Review of Accounts***

Form ADV Part 2A, Item 13

Firm shall provide reviews of all client accounts on an ongoing periodic basis. As a practical matter, Firm does provide ongoing periodic reviews of investment policy. The review is ongoing. There are no differing levels of review. There are no independent factors that initiate reviews. All reviews are handled by either Lawrence Kades or Howard Kades.

Firm sends Client Account Summaries to clients on a quarterly basis.

### ***Client Referrals and Other Compensation***

Form ADV Part 2A, Item 14

None.

### ***Custody***

Form ADV Part 2A, Item 15

None.



***Investment Discretion***

Form ADV Part 2A, Item 16

Firm is granted discretionary authority through the execution by the client of a limited power of attorney.

***Voting Client Securities***

Form ADV Part 2A, Item 17

Firm does not vote proxy statements on behalf of any advisory client.

***Financial Information***

Form ADV Part 2A, Item 18

Firm does not receive advisory fees more than six months in advance.