

Firm Brochure

(Part 2A of Form ADV)



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This brochure provides information about the qualifications and business practices of Kuntz Lesher Capital LLC. If you have any questions about the contents of this brochure, please contact Sarah Young Fisher, our Chief Compliance Officer, at: 717-399-1700, or by email at klc@klcinvest.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 Kuntz Lesher Capital LLC is available on the SEC's website at www.adviserinfo.sec.gov.

March 18, 2015

Item 2. 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

There have been no material changes to report since the Firm ADV Part II (Brochure) dated February 5, 2014 was published.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 717-399-1700 or by email at klc@klcinvest.com.

Table of Contents

Item 1. Cover Page	Cover
Item 2. Material Changes	i
Annual Update	
Material Changes since the Last Update	
Full Brochure Available	
Item 3. Table of Contents	1
Item 4. Advisory Business	3
Firm Description	
Principal Owners	
Types of Advisory Services	
Investment Management Services	
Consulting Advice on Investments	
Consulting Advice to Retirement Plans	
Consulting Advice on Matters not Involving Securities	
Item 5. Fees and Compensation	5
Fees for Investment Management Services	
Fees for Consulting Advice on Investments	
Fees for Consulting Advice to Retirement Plans	
Fees for Consulting Advice on Matters not Involving Securities	
Fee Waivers	
Other Fees	
Expense Ratios	
Termination of Agreement	
Item 6. Performance-Based Fees	7
Sharing of Capital Gains	
Item 7. Types of Clients	7
Description	
Account Minimums for Investment Management Services	
Item 8. Methods of Analysis, Investment Strategies and Risk of Loss	8
Methods of Analysis	
Investment Strategies	
Risk of Loss	
Item 9. Disciplinary Information	10
Legal and Disciplinary	
Item 10. Other Financial Industry Activities and Affiliations	10
Financial Industry Activities	

Financial Industry Affiliation – Accounting Firm, Reinsel Kuntz Leshar LLP	
Financial Industry Affiliation – Insurance Agency, Reinsel Kuntz Leshar Financial Services LLC	
Financial Industry Affiliation – Investment Advisor, Sterling Financial Advisors LLC	
Item 11. Code of Ethics, Participation or Interest in Client Transactions, 11	
Personal Trading	
Code of Ethics	
Participation or Interest in Client Transactions	
Personal Trading	
Item 12. Brokerage Practices 12	
How We Select Our Custodian and Brokers	
The Custodian and Brokers We Use	
Your Custody and Brokerage Costs	
Products and Services Available to Us From Schwab	
Our Interest in Schwab's Services	
Order Aggregation	
Item 13. Review of Accounts..... 14	
Periodic Reviews	
Review Triggers	
Accounts that are not Reviewed	
Regular Reports	
Item 14. Client Referrals and Other Compensation 15	
Incoming Referrals	
Solicitor's Program	
Referrals Out	
Other Compensation	
Item 15. Custody 15	
Account Statements from the Custodian	
Account Statements from KLC	
Item 16. Investment Discretion 16	
Discretionary Authority for Trading	
Limited Power of Attorney	
Item 17. Voting Client Securities 16	
Proxy Votes	
Item 18. Financial Information 16	
Financial Condition	

Item 4. Advisory Business

Firm Description

Kuntz Leshner Capital (KLC) was founded in 1999.

We manage investments for individuals, trusts, estates, charitable organizations, corporations, small businesses and retirement plans. Coincident to investment management, we may provide advice to our clients in the following areas: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, education funding, retirement planning, and estate planning.

Unless otherwise specified, KLC manages accounts on a discretionary basis. If so authorized, we may buy or sell any security in any amount without obtaining specific client consent. We place trades for clients under a limited power of attorney. We do not act as a custodian of client assets. Currently, Charles Schwab & Co., Inc. is the custodian for most client assets.

KLC also provides consulting advice to pensions and profit sharing plans, as well as individuals, separate from investment management.

We are strictly a fee-only investment management firm. We do not accept commissions in any form. We do not accept any finder's fees.

We provide a free initial consultation. This meeting is considered an exploratory interview to determine the extent to which our services may be beneficial to you.

Principal Owners

Reinsel Kuntz Leshner LLP (RKL) is 100% owner of Kuntz Leshner Capital LLC.

Types of Advisory Services

KLC provides

- Investment Management Services;
- Consulting Advice on Investments;
- Consulting Advice to Retirement Plans; and
- Consulting Advice on Matters not Involving Securities, such as determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, education funding, retirement planning, and estate planning.

As of 12/31/2014, KLC managed approximately \$356,600,000 in assets for approximately 451 clients. We managed approximately \$355,100,000 on a discretionary basis, and \$1,500,000 on a non-discretionary basis.

In addition, we provide consulting advice to 14 retirement plans with an aggregate of \$51,600,000 in assets.

Investment Management Services

KLC provides continuous investment advice to clients and makes investment decisions on the client's behalf based on the client's stated goals and investment objectives. These services include an analysis of the client's current investment holdings, current income and income needs, tax bracket, risk tolerances, investment experience and family situation. Based upon this information, we provide investment management services to develop and implement an investment strategy. As this is a personalized investment plan, the client may impose investment restrictions on the account or give us special instructions. These are detailed in the "Client Questionnaire" addendum of the investment advisory agreement and updated during client meetings.

Item 4. Advisory Business (Continued)

Investment Management Services (Continued)

At the client's request or with the client's approval, KLC may utilize separately managed accounts (SMAs) or sub advisors to manage all or part of a client's assets as part of the overall investment strategy. A separately managed account is an account that is managed by an investment professional other than your advisor at KLC where the client directly owns the securities. This differs from a mutual fund where the client does not own the individual securities, but rather shares of the mutual fund. An SMA allows for greater customization and tax efficiencies due to individual cost basis.

These separate account managers are located all around the world and are hired by KLC to strictly manage money according to a particular style of investment and client customization. The SMA can consist of equities, fixed income, preferred stock, exchange traded funds and, on occasion, mutual funds. Charles Schwab has developed a network of these types of managers with negotiated fees and minimums for our clients who can meet these minimums. Most of the time, SMA managers will offer no client contact and offer no personal advice on investments. They strictly manage the money in that separate account while KLC remains your trusted advisor.

Consulting Advice on Investments

For individual clients, KLC provides investment advice customized to the specific needs of the client. The services are detailed in a written consulting agreement.

Consulting Advice to Retirement Plans

For participant directed retirement plans (401(k), 403(b), 457(b), Money Purchase, etc.), we coordinate with the plan's third party administrator, recommend the initial mutual funds in the plan, monitor all the mutual funds' performance, suggest changes in the funds used in the plan as needed, conduct group enrollment meetings, consult with plan participants, and prepare a quarterly review for plan trustees. The services are detailed in a written consulting agreement specifically for retirement plans.

Consulting Advice on Matters not Involving Securities

KLC provides tax preparation, tax planning, estate planning, elder care services and bill paying services to its clients. Fees for these services may be waived for clients receiving investment management services.

Tax returns are generally prepared by our parent company, RKL, and billed to advisory clients by KLC or RKL. From time to time, we may also prepare tax returns for advisory clients.

Item 5. Fees and Compensation

Fees for Investment Management Services

Fees are generally based on a percentage of assets under management. The KLC standard fee schedule is stated below. Fee arrangements may vary from this schedule due to a number of factors such as acquisitions, client circumstance, and/or a negotiated fee. Annual fees are based upon the total market value of the client's investments as follows:

- 1.00% for the first \$1,000,000
- 0.85% for the next \$4,000,000
- 0.75% for the next \$5,000,000
- Negotiable for the amounts over \$10,000,000

However, for assets managed by separate account managers or sub advisors, the KLC annual fee is .30%.

Minimum annual fee: \$2,400. This minimum annual fee is applied on a quarterly basis so the minimum quarterly fee is \$600. This minimum fee may be waived at our sole discretion. Only fees paid to KLC, not to separate account managers or sub advisors, are considered when computing the minimum fee.

Fees are payable quarterly in arrears. Fees billed quarterly will be based on the quarter end market value and invoiced to the client on request. Quarter end market value will be time-weighted for individual additions or withdrawals of funds in excess of \$5,000 during the period. The client may pay fees directly or authorize us to debit fees from a designated client account.

To facilitate billing, we usually deduct fees from a designated client account. The Custodian will deduct from the Account and pay us our fees each quarter after we submit an invoice to the Custodian. You may request a quarterly invoice from us showing the amount of our fees, the account value on which we based our fees, and how we calculated our fees. The Custodian does not verify fee computations; therefore it is your responsibility to verify the accuracy of the fee calculation. The monthly statement provided to you by the Custodian will show all amounts paid from the Account, including our fees.

All fees and account minimums may be negotiable in certain circumstances.

All fee arrangements are detailed in the client's investment management agreement.

Fees for Consulting Advice on Investments

For individual clients, KLC bills fees for consulting advice at an hourly rate ranging from \$75 to \$250 per hour depending on the nature and complexity of the services. Fees are generally payable quarterly in arrears or at the completion of the service.

All fees may be negotiable in certain circumstances.

All fee arrangements are detailed in the client's consulting agreement.

Fees for Consulting Advice to Retirement Plans

For participant directed retirement plans, we bill fees for consulting advice as either a percentage of assets under advisement or a fixed fee.

- The percentage of assets under advisement fee is used exclusively for consulting services to 401(k), 403(b), 457(b), and Money Purchase retirement plans. It is generally one half percent (0.50%) or less per annum, and is payable quarterly. Fees are paid in advance, or arrears – depending on the record keeper. Minimum fees may also apply. For fees paid in advance, KLC will refund any unearned fees upon a 20-day written notice of the termination of services.
- Fixed fees range from \$300 to \$1,500 and are payable in arrears.

All fees may be negotiable in certain circumstances.

All fee arrangements are detailed in the client's consulting agreement.

Item 5. Fees and Compensation (Continued)

Fees for Advice on Matters not Involving Securities

KLC bills fees for these services at an hourly rate or a fixed fee.

- Hourly rates range from \$75 to \$250.
- Fixed fees are based on the complexity of the services to be performed and range from \$250 to \$2,000.

Fees are generally payable at the completion of the service; however, interim billings may occur.

All fees may be negotiable in certain circumstances.

All fee arrangements are detailed in the client's consulting agreement.

Fee Waivers

KLC, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee.

Other Fees

Custodians charge transaction fees on purchases or sales of stocks, exchange-traded funds, fixed income securities, and certain mutual funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The custodian may also charge fees for specific services like overnight delivery of a check or processing a wire transfer. Please refer to "Item 12. Brokerage Practices - Your Custody and Brokerage Costs."

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% or one half of one percent for their services. These fees are in addition to the fees paid by you to KLC.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted. So they are net of the mutual fund's management fee.

Termination of Agreement

You or KLC may terminate the contract on written notice of 20 days. Upon termination of any contract, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. You have the right to terminate an agreement without penalty within five business days after entering into the agreement.

Item 6. Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities. KLC does not use a performance-based fee structure.

Item 7. Types of Clients

Description

KLC provides investment advice to individuals, trusts, estates, charitable organizations, corporations and small businesses, pensions and profit sharing plans.

Account Minimums for Investment Management Services

The minimum account size is \$250,000 of assets under management. The minimum annual fee is \$2,400. This minimum annual fee is applied on a quarterly basis, so the minimum quarterly fee is \$600. KLC has the sole discretion to waive the minimum account size and the minimum quarterly fee.

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

Methods of Analysis

Security analysis methods include fundamental, technical, and cyclical analysis.

Fundamental analysis is the in-depth study of the financial condition and operating results of a firm. This method of evaluating a security attempts to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts study company-specific factors like financial condition and management. They also consider macroeconomic factors like the overall economy and industry conditions. The end goal is to produce a value that an investor can compare with the security's current price to decide whether to buy or sell. This method of security analysis is considered to be the opposite of technical analysis.

Technical analysis is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity.

Cyclical analysis is the use of business cycle stages to indicate which securities will perform best given the current business phase and market conditions.

KLC employs research provided by Bloomberg, Morningstar, Schwab Advisor Services, and numerous internet sites. Other sources of information include financial newspapers and magazines, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Investment Strategies

The primary investment strategy used in investment management services is asset allocation and selection. Asset allocation is long-term in nature in determining the proper proportion of equities to non-equity securities given your personal risk tolerances, time horizon, and income needs. Within the equity sleeve of your portfolio we employ a range of securities using a short-term or long-term approach. Individual stocks, equity exchange-traded funds (ETF's), and/or equity mutual funds may comprise the equity sleeve. We also draw on a range of securities in the non-equity sleeve, again, using a short-term or long-term approach. Individual bonds, unit investment trusts (UIT's), bond ETF's, bond mutual funds, commodity ETF's, commodity mutual funds and alternative strategy mutual funds may comprise the non-equity sleeve. We seek diversification in all portfolios to reduce risk.

For some clients, particularly those with a large asset base, we may utilize separate account managers (SMAs) or sub advisors to manage all or part of the portfolio.

On rare occasions we may use limited partnerships. We may buy call & put options to hedge risk and write covered calls to generate income. These types of investments are more risky in nature and are only suitable for clients whose asset size and risk tolerance allow.

Your investment strategy is based upon the objectives you establish in the Client Questionnaire completed by you at the onset of our relationship. This questionnaire is part of your investment advisory agreement. We review and potentially revise these objectives in our meetings with you. You may change these objectives at any time by notifying us.

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

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 is 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 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.
- **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.

The following risks are mitigated by adequate diversification:

- **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. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **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.

Item 9. 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.

Item 10. Other Financial Industry Activities and Affiliations

Financial Industry Activities

Kuntz Leshar Capital LLC is not registered as a securities broker-dealer, or a futures commission merchant, commodity pool operator or commodity trading advisor. None of our employees are registered representatives of a broker-dealer.

Financial Industry Affiliation – Accounting Firm, Reinsel Kuntz Leshar LLP

KLC is a wholly owned subsidiary of Reinsel Kuntz Leshar LLP (RKL), a certified public accounting and consulting firm. RKL provides equipment and certain personnel to us at no cost.

RKL may recommend KLC to accounting clients in need of advisory services. We may recommend RKL to advisory clients in need of accounting services. Accounting services provided by RKL are separate and distinct from the advisory services of KLC, and are provided for separate and typical compensation.

We compensate the partners and employees of RKL for client referrals. This is explained further in the section titled “Client Referrals and Other Compensation.” No KLC client is obligated to use RKL for any accounting services and, conversely, no accounting client is obligated to use the advisory services provided by us.

Financial Industry Affiliation – Insurance Agency, Reinsel Kuntz Leshar Financial Services LLC

Reinsel Kuntz Leshar Financial Services LLC (RKLFS) is a licensed insurance agency in Wyomissing PA. Both KLC and RKLFS are wholly owned subsidiaries of RKL, a certified public accounting and consulting firm.

RKLFS offers various insurance products. We may refer advisory clients to RKLFS for their insurance needs. There are no referral fee arrangements between KLC and RKLFS for any such referral. Advisory clients are under no obligation to engage RKLFS when considering an insurance purchase. Any insurance purchase is solely at the discretion of the client.

Financial Industry Affiliation – Investment Advisor, Sterling Financial Advisors LLC

Sterling Financial Advisors LLC (Sterling) is an investment advisor in Wyomissing PA. Both KLC and Sterling are wholly owned subsidiaries of RKL, a certified public accounting and consulting firm. Sterling may refer advisory clients to KLC and vice versa where the other advisory firm’s services are more appropriate to a client’s financial circumstances and investment objectives. There are no referral fee arrangements between KLC and Sterling for any such referral.

Item 11. Code of Ethics, Participation or Interest in Client Transactions, Personal Trading

Code of Ethics

The employees of KLC have committed to a Code of Ethics that is available for review by clients and prospective clients upon request.

As a summary, our Code establishes rules of conduct for all of our employees. It is designed especially to govern personal securities trading activities in the accounts of employees, their immediate family members and accounts in which an employee has a beneficial interest. The Code is based upon the principle that KLC and its employees owe a fiduciary duty to our clients to conduct our personal business, including personal securities transactions, in such a manner as to avoid serving our own personal interests ahead of clients, to avoid taking inappropriate advantage of our position with the firm and to avoid any actual or potential conflicts of interest.

KLC and its employees are subject to the following specific fiduciary obligations when dealing with clients:

- The duty to have a reasonable, independent basis for the investment advice provided;
- The duty to obtain best execution for a client's transactions where we are in a position to direct brokerage transactions for the client;
- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs and circumstances; and
- A duty to be loyal to clients.

In addition, our Code prohibits trading using non-public information.

Employees may only accept gifts of a nominal value.

Privacy is a key element of the Code. Employees pledge to keep all client information confidential during and after employment.

If you would like more information about our Code of Ethics, please request a copy by contacting Sarah Young Fisher, our Chief Compliance Officer, at 717-399-1700 or by email at klc@klcinvest.com.

Participation or Interest in Client Transactions

KLC and its employees may buy or sell securities that are also held by clients. Our employees may not trade their own securities ahead of client trades. However, personal security transactions for our employees may be included in block trades. Please refer to "Item 12. Brokerage Practices – Order Aggregation."

Our employees comply with the provisions of the KLC Code of Ethics in this regard. Again, the Code of Ethics is available for your review upon request.

Personal Trading

Sarah Young Fisher, our Chief Compliance Officer, reviews all employee trades in reportable securities each quarter. Generally, a reportable security is any stock, ETF, or bond. In the regulations, it is defined by exception. It is any security except:

- Direct obligations of the U.S. Government, e.g. U.S. Treasury bills, notes and bonds;
- High quality short term instruments; e.g. U.S. bank CDs, commercial paper; or bankers acceptance;
- Money market funds;
- Open-end investment companies, i.e. mutual funds, unless our firm, or an affiliated company, acts as investment adviser, sub-adviser or principal underwriter to the mutual funds; and
- Units of unit investment trusts.

These personal trading reviews ensure that our employees comply with our Code of Ethics in their personal securities transactions.

Item 12. Brokerage Practices

How We Select Our Custodian and Brokers

We recommend a custodian and broker who will hold your assets and execute transactions on terms that we believe are most advantageous when compared to other available providers. We consider a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see “Products and services available to us from Schwab”)

The Custodian and Brokers We Use

KLC does not maintain physical custody of your assets. Your assets must be maintained in an account at a “qualified custodian.” For Investment Management Services we currently recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we or you instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. If you do not wish to place your assets at Schwab, then we cannot manage your account. Not all advisers require their clients to use a particular broker-dealer or other custodian selected by the adviser. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account.

Your Custody and Brokerage Costs

For our clients’ accounts that Schwab maintains, Schwab generally does not charge separately for custody services. Instead, Schwab is compensated by charging you transaction fees on trades that it executes. However, for some separately managed accounts (SMAs), Schwab may charge you a percentage of the dollar amount of assets in the account in lieu of transaction fees. These are called asset based fees and include the fee to the separate account manager.

On occasion and especially for fixed income purchases, we may use a broker other than Schwab. In these incidences, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed through a different broker-dealer but settled into your Schwab account. These fees are in addition to the compensation you pay the executing broker-dealer.

With the exception of fixed income purchases, we have Schwab execute most trades for your account in order to minimize your trading costs. We have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “Item 12. Brokerage Practices – How We Select Our Custodian and Brokers.”)

Item 12. Brokerage Practices (Continued)

Products and Services Available to Us From Schwab

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting, and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services generally are available on an unsolicited basis and at no charge to us, as long as our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. Following is a more detailed description of Schwab's support services:

Services That Benefit You. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets.

Services That May Not Directly Benefit You. Schwab also makes available to us other services that benefit us but may not directly benefit you or your account. These services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back office functions, recordkeeping, and client reporting

Services That Generally Benefit Only Us. Schwab also offers other services to help us manage and develop our business. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

Schwab may discount or waive fees for these services. We use most of these services to benefit our clients and our business.

Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We do not pay for Schwab's services so long as our clients collectively keep a total of at least \$10 million of their assets in accounts at Schwab. We believe that our recommendation of Schwab as custodian and broker is in the best interests of our clients. Our recommendation is primarily supported by the scope, quality, and price of Schwab's services, not Schwab's services that benefit only us. We receive no fees, commissions, or referrals from Schwab or any recommended custodian or broker.

Order Aggregation

KLC will block trades where possible and when advantageous to clients. Blocking trades, or order aggregation, is the trading of an aggregate block of an individual security from multiple client accounts. This practice allows us to execute trades in a timely, equitable manner. Personal security transactions for our employees may be included in block trades.

Item 13. Review of Accounts

Periodic Reviews

For Investment Management Services, our Investment Committee reviews accounts quarterly. We review accounts more frequently when market conditions dictate.

Review Triggers

Additionally, we may review your account when you change your investment objectives, contribute cash or assets to your account, change your current distributions or experience fixed income maturities or redemptions. New investment information and changes in tax law may also trigger review.

Accounts that are not Reviewed

Some clients may open accounts that they manage themselves in conjunction with their advisory accounts. We do not review client managed accounts.

We do not review accounts for clients who have opened accounts as a result of a consulting agreement unless specified in the agreement or requested by the client.

Regular Reports

We communicate with our clients through a range of reports, telephone calls, letters, and regular client meetings. The frequency and type of communication varies from client to client and depends on your needs, circumstances, and wishes. For Investment Management Services, we will provide a performance report on a quarterly, semiannual or annual basis.

Item 14. Client Referrals and Other Compensation

Incoming Referrals

KLC indirectly and directly compensates the partners of RKL for client referrals. The indirect compensation is in the form of increased profitability, which is allocated to RKL partners subject to their partnership agreement.

In addition, KLC directly compensates the employees of RKL and third party solicitors for client referrals. This direct compensation is in the form of a solicitor's fee and adheres to the solicitor's program outlined below.

Solicitor's Program

On occasion, KLC may pay referral fees to solicitors for assisting in obtaining new investment management clients. The referral fee is specified in the solicitor's agreement between KLC and the solicitor. This referral fee does not increase the client's investment management fee in any way. Every solicitor must provide the prospective client with a copy of our current Form ADV Part II and a solicitor's disclosure statement. The solicitor must then obtain written acknowledgment of receipt of the Form ADV Part II and the signed solicitor's disclosure statement and provide the original signed solicitor's disclosure statement to KLC.

Referrals Out

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

Other Compensation

We receive an economic benefit from Schwab only in the form of support products and services it makes available to us. These are fully described in "Item 12. Brokerage Practices – Products and Services Available to Us from Schwab." The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Item 15. Custody

Account Statements from the Custodian

All assets are held at qualified custodians. Your custodian will provide account statements directly to you at your email or postal mailing at least quarterly. You should carefully review those statements promptly when you receive them.

Under government regulations, we are deemed to have custody of your assets if you authorize us to instruct Schwab to deduct our advisory fees directly from your account. Schwab maintains actual custody of your assets.

Account Statements from KLC

You are urged to compare the account statements received directly from your custodian to the account statements provided by KLC.

Our account information may vary from custodial statements based on accounting procedures, reporting dates, dividends or valuation methodologies regarding certain securities.

Item 16. Investment Discretion

Discretionary Authority for Trading

Discretionary trading authority facilitates placing trades in your accounts, so that we may promptly implement your investment objectives.

For Investment Management Services, unless otherwise specified by you, KLC has discretionary authority to trade securities in your accounts, i.e. we have your permission to buy or sell any security in any amount without first obtaining your specific consent. You give us this authority in your investment advisory agreement.

On occasion, you may limit this authority if you have holdings in your account that you do not wish us to manage, for example legacy holdings. You would note this limitation in the "Investment Restriction" section of the Client Questionnaire at the onset of our relationship. This questionnaire is part of your investment advisory agreement and is updated in our meetings with you.

KLC may then, in its sole discretion, maintain investment securities in your account subject to your instructions to maintain such position. Unless expressly agreed with you, we do not (a) render any advice as to the advisability of maintaining these self directed/unmanaged securities or (b) monitor the performance of the securities involved either individually or as a component of the overall performance of your account.

Limited Power of Attorney

A limited power of attorney is a trading authorization used by your custodian for the purpose of our discretionary trading authority. You sign a limited power of attorney when you open your account.

Item 17. Voting Client Securities

Proxy Votes

KLC does not vote proxies on securities. You are expected to vote your own proxies. You will receive proxy material directly from your account custodian. We will provide recommendations to you, when requested.

Item 18. Financial Information

Financial Condition

KLC has never been the subject of a bankruptcy petition.

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