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Kenilworth Asset Management, LLC

2440 W Cortez. Unit 1

Chicago, IL 60622

[Clayton@kenilworthasset.com](mailto:Clayton@kenilworthasset.com)

February 12th 2015

847-975-1142

This Brochure provides information about the qualifications and business practices of Kenilworth Asset Management, LLC. If you have any questions about the contents of this Brochure, please contact us at 847-975-1142. 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.

Kenilworth Asset Management, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. Additional information about Kenilworth Asset Management, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## **Item 2 - Material Changes**

This Brochure, dated February 12<sup>th</sup>, 2015 is an update to our prior Brochure dated June 1, 2012. There are material changes.

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#### **Item 4 – Advisory Business**

Kenilworth Asset Management, LLC (“Kenilworth”) is an State of Illinois Registered advisory firm that has been in business since 2002. Kenilworth Asset Management, LLC is a privately held company. The principal owner is Clayton Lawrie.

Kenilworth provides fee-based investment management services offering customized portfolios of individual exchange listed securities, over-the counter securities, corporate debt securities, commercial paper, real estate investment trusts, municipal securities, mutual funds, United States government securities and options in securities to meet client objectives.

Advisory services are tailored to the individual needs of clients by thoroughly reviewing the goals, objectives and investing parameters of each client. Clients may impose restrictions on investing in certain securities or types of securities.

Kenilworth manages client assets on a discretionary basis. Discretionary managed assets total \$1,000,000.00 as of February 12<sup>th</sup> 2015.

#### **Item 5 – Fees and Compensation**

All fees are negotiated individually with each client.

The specific manner in which fees are charged by Kenilworth is established in a client’s written agreement with us. We will generally bill our fees on a quarterly basis, in advance. Clients may elect to be billed directly for fees or to authorize us to directly debit fees from client accounts. Management fees shall not be prorated for each capital contribution and withdrawal made during the applicable month. Accounts initiated during a calendar month will be charged a prorated fee.

Accounts terminated mid-quarter will receive a refund of that quarter’s fee on a pro-rata basis, based on the number of days left in the quarter. You may contact us at the email on the front page of this brochure in order to receive your refund.

Kenilworth’s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties

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such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Kenilworth's fee, and Kenilworth shall not receive any portion of these commissions, fees, and costs. Please see Item 12 – "Brokerage Practices" for more information.

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

Kenilworth does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client.)

### **Item 7 – Types of Clients**

Kenilworth provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, charitable institutions, foundations, endowments, registered mutual funds, private investment funds, trust programs, and other U.S. and international institutions.

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

Our security selection focuses on a "bottom-up" approach. We screen our universe of 12,000+ securities for certain characteristics of growth, value and income and compile a list of potential investments. Then we review each security fundamentally to validate its current financial characteristics. If the security is found to be attractive on its fundamentals and analytics, we recommend the security for purchase in a specified price range. We focus on the technical characteristics of each security and the market as a whole before we implement our buying (selling) program. Specific securities guide our weightings in each sector – not the market sector weighting itself.

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Investing in securities involves risk of loss that clients should be prepared to bear. The more frequently securities are traded in your account, the higher your transaction costs will be.

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

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Kenilworth Asset Management, LLC or the integrity of Kenilworth asset Management's management. Kenilworth Asset Management, LLC has no information applicable to this Item.

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

The following persons associated with Kenilworth are also affiliated with other financial industry companies: None

#### **Item 11 – Code of Ethics**

Kenilworth As has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Kenilworth As must acknowledge the terms of the Code of Ethics annually, or as amended.

Kenilworth anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which we have management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Kenilworth, its affiliates and/or clients, directly or indirectly, have a position of interest.

Kenilworth Asset Management's clients or prospective clients may request a copy of the

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firm's Code of Ethics by contacting Clayton Lawrie at 847-975-1142 or [clayton@kenilworthasset.com](mailto:clayton@kenilworthasset.com).

## **Item 12 – Brokerage Practices**

Kenilworth Asset Management, LLC utilizes the trading platforms and custodial services of LPL. When selecting or recommending a particular, we will consider the overall fees, commissions, customer services, execution ability, and reporting functions of the custodian.

We may not be able to utilize the custodian that you prefer. The custodian that we select may have higher costs than other custodians that may be available through other advisors.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Kenilworth's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. Kenilworth will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

## **Item 13 – Review of Accounts**

An annual account review shall be conducted for all open accounts as least once each calendar year. The investment advisor representative assigned to the account is responsible for ensuring that the annual account review has been completed. All completed annual account reviews will be forwarded to the Investment Advisory Committee for supervisory review.

Periodic account reviews may also take place: upon receipt of a client inquiry or complaint; if an exception report or the custodian raises a question or concern.

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

None

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### **Item 15 – Custody**

Clients will receive, at least quarterly account statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Kenilworth urges clients to carefully review those account statements.

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

Kenilworth usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives and restrictions for the particular client account. The client provides us with limited discretionary authority when he/she signs our Investment Management Agreement.

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

Kenilworth shall not at any time vote proxies or provide proxy vote recommendations.

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

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about their financial condition. Kenilworth has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.



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Kenilworth Asset Management, LLC

2440 W. Cortez Unit 1

Chicago, IL 60622

847-975-1142

[www.kenilworthasset.com](http://www.kenilworthasset.com)

February 12<sup>th</sup> 2015

**FORM ADV PART 2B  
SUPPLEMENT**

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***Item 1***

**Clayton C. Lawrie, Owner  
Kenilworth Asset Management, LLC  
600 Green Bay Road  
Kenilworth, IL 60043  
847-975-1142**

**February 12<sup>th</sup>, 2015**

This Brochure Supplement provides information about Clayton C. Lawrie that supplements the Kenilworth Asset Management, LLC Brochure. You should have received a copy of that Brochure. Please contact us at 847.920.0400 if you did not receive Kenilworth Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about Clayton Lawrie is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

***Item 2 Educational Background and Business Experience***

Year of Birth: 1979

Formal Education after High School:

- University of Arizona – Bachelor of Arts

Business Background for at Least the Preceding Five Years:

- Kenilworth Asset Management: Co-Owner and Principal

***Item 3 Disciplinary Information***

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

***Item 4 Other Business Activities***

Mr. Lawrie does not receive additional compensation for other business activities.

***Item 5 Additional Compensation***

Mr. Lawrie receives no additional compensation for providing investment advisory services.

***Item 6 Supervision***

Mr. Lawrie is supervised by himself and can be reached at 847-975-1142.

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### *Item 1*

**John Daniel Hansen  
Kenilworth Asset Management, LLC  
600 Green Bay Road  
Kenilworth, IL 60043  
847-975-1142**

**February 12<sup>th</sup>, 2015**

This Brochure Supplement provides information about John Daniel Hansen that supplements the Kenilworth Asset Management, LLC Brochure. You should have received a copy of that Brochure. Please contact us at 847.920.0400 if you did not receive Kenilworth Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about John Daniel Hansen is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### *Item 2 Educational Background and Business Experience*

Year of Birth: 1953

Formal Education after High School:

- Western Illinois University – Business Degree
- St. Norbert College

Business Background for at Least the Preceding Five Years:

- Present: Investment Advisor Representative, Kenilworth Asset Management, LLC.
- Prior: Cantella – 401K Plan Marketer
- Prior: Oberlin Financial – 401k Plan Marketer

### *Item 3 Disciplinary Information*

Mr. Hansen has disciplinary information disclosed on the FINRA BrokerCheck site. The site can be accessed by using this URL: <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck>.

### *Item 4 Other Business Activities*

Mr. Hansen does not receive additional compensation for other business activities.

### *Item 5 Additional Compensation*

Mr. Hansen receives no additional compensation for providing investment advisory services.

### *Item 6 Supervision*

Mr. Hansen is supervised by Clayton Lawrie. Mr. Lawrie can be reached at 847.975-1142.