

**ITEM 1  
COVER PAGE**

**PART 2A OF FORM ADV: FIRM BROCHURE**



# **FLORIO WEALTH MANAGEMENT GROUP**

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May 17, 2019

This brochure provides information about the qualifications and business practices of Florio Wealth Management Group, ("FWMG") (together, with its relying adviser affiliates, the "Adviser," "we," "us," or "our"). If you have any questions about the contents of this brochure, please contact us at 516-758-2430 or by email at: [pflorio@floriowmg.com](mailto:pflorio@floriowmg.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the "SEC") or by any state securities authority.

Additional information about us is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

We are a registered investment adviser. Our registration does not imply any level of skill or training.

## **ITEM 2**

### **MATERIAL CHANGES**

Pursuant to SEC requirements and rules, you will receive a summary of any material changes to this brochure and subsequent brochures within 120 days of the close of our fiscal year.

FWMG is in the process of transitioning its registration from the U.S. Securities and Exchange Commission to New York State.

Our brochure may be requested, free of charge, by contacting us by telephone at: (516) 758-2430 or by email at: [pflorio@floriowmg.com](mailto:pflorio@floriowmg.com).

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Brochure Supplements

## **ITEM 4 ADVISORY BUSINESS**

### **A. General Description of Advisory Firm**

Florio Wealth Management Group (“FWMG”) is incorporated in the state of New York. FWMG was recently granted registration as an Investment Adviser Firm with the SEC on April 13, 2017, however FWMG is in the process of transitioning its registration to New York State. Peter Florio CFP®, CLU, CHFC, CLTC is the sole principal and CEO/CCO of the firm.

### **B. Description of Advisory Services**

#### **ADVISORY SERVICES**

FWMG offers a variety of advisory services, which include financial planning, consulting and pension consulting. Prior to the rendering of any of the foregoing advisory services, clients are required to enter into one or more written agreements with FWMG setting forth the relevant terms and conditions of the advisory relationship (the “*Agreement*”).

FWMG primarily acts as a solicitor to third-party registered investment advisers (“third-party advisers”) by referring potential new clients (“referred parties”) to those advisers for the purposes of receiving investment advisory services. The Firm does not have any assets under management. While the Firm has registered as an investment adviser because of certain state regulations and preferences of the third-party advisers, neither the Firm or its associated persons or affiliates provide investment advice. The Firm does not recommend (either initially or ongoing) the third-party advisers as a fiduciary, but merely facilitates the introduction. It is the referred parties who decide whether to retain the third-party adviser.

#### **FINANCIAL PLANNING AND CONSULTING SERVICES**

FWMG may provide its clients with a broad range of comprehensive financial planning and consulting services (including non-investment related matters), which may address, among other issues, estate and retirement planning, taxes, insurance, college planning, long term care issues and/or investment recommendations.

#### **RETIREMENT PLAN FIDUCIARY SERVICES**

In certain instances, FWMG may provide fiduciary services to retirement plan sponsors. In this regard, FWMG has expertise in advising retirement plans and their participants regarding the proper and effective use of mutual funds for investing. FWMG may act as the investment manager for pension plans; as such term is defined in Section 3(38) of ERISA. As such, FWMG shall have discretion over the establishment of the pension plan’s investment policy, the prudent selection, monitoring, removal and replacement of the pension plan’s investment options. FWMG will be serving as a fiduciary to pension plans under ERISA in performing these functions.

Please refer to the Plan Agreement for relative fees and costs associated with this service.

**C. Availability of Customized Services for Individual Clients**

FWMG shall provide investment advisory services specific to the needs of each client. Prior to providing investment advisory services FWMG will ascertain each client's investment objective(s). The client may, at any time, impose reasonable restrictions, in writing, on FWMG's services.

**D. Wrap Fee Programs**

FWMG does not participate in a wrap fee program.

**E. Assets Under Management**

FWMG does not manage assets; but refers its clients to third-party advisers.

**ITEM 5  
FEES AND COMPENSATION**

**A. Advisory Services and Fees**

**ADVISORY SERVICES**

The referred parties do not pay FWMG a fee directly. Rather, the Firm will receive referral fees directly from the third-party adviser, if the referred party establishes an investment advisory relationship with the third-party adviser.

The Firm or the third-party adviser provide referred parties with a disclosure document that describes the compensation that the Firm will receive from the third-party adviser for solicitation services.

**FINANCIAL PLANNING AND CONSULTING SERVICES**

FWMG generally charges either a negotiable hourly and/or fixed fee to provide clients with stand-alone financial planning or consulting services. These fees are largely determined by the scope and complexity of the agreed upon services and range from \$200 to \$500 on an hourly basis and \$2,500 to \$50,000 on a fixed fee basis.

The specific terms and fee structure are negotiated in advance and set forth in the *Agreement* with FWMG. Generally, FWMG requires the entirety of the financial planning or consulting fee payable upon execution of the *Agreement* and any balance will be due at the time the financial plan is delivered or the underlying services are rendered to completion. If the client engages FWMG for additional investment advisory services, FWMG may offset all or a portion of its fees for those services based upon the amount paid for the financial planning and/or consulting services.

## **B. Payment of Fees**

FWMG, in its sole discretion, may negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client relationship, account retention and pro bono activities.

Clients generally provide FWMG with the authority to directly debit their accounts for payment of the Firm's investment advisory fees. The *Financial Institutions* that act as qualified custodian for client accounts have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to FWMG.

## **C. Additional Expenses and Fees**

In addition to the advisory fees paid to FWMG, clients may also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively "Financial Institutions"). These additional charges may include securities brokerage commissions, transaction fees, custodial fees, fees charged by the Independent Managers, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), 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. The Firm's brokerage practices are described at length in Item 12, below.

Clients can engage certain persons associated with FWMG to render securities brokerage services under a separate commission-based arrangement. Clients are under no obligation to engage such persons and may choose brokers or agents not affiliated with FWMG. Under this arrangement, the Firm's *Supervised Persons*, in their individual capacities as registered representatives of a FINRA-member firm, may provide securities brokerage services and implement securities transactions under a separate commission-based arrangement. *Supervised Persons* may be entitled to a portion of the brokerage commissions paid to the FINRA-member firm, as well as a share of any ongoing distribution or service (trail) fees from the sale of mutual funds. FWMG may also recommend no-load or load-waived funds, where no sales charges are assessed. Prior to effecting any transactions, clients are required to enter into a separate account agreement with a FINRA-member firm. FWMG does not receive any portion of the commissions or transactional fees charged by the FINRA-member firm.

A conflict of interest exists to the extent that FWMG recommends the purchase of securities where FWMG's *Supervised Persons* receive commissions or other additional compensation as a result of FWMG's recommendations. FWMG has procedures in place to ensure that any recommendations made by such *Supervised Persons* are in the best interest of clients. For certain accounts covered by the Employee Retirement Income Security Act ("ERISA") and such others that FWMG, in its sole discretion, deems appropriate, FWMG may provide its investment advisory services on a fee-offset basis.



In this scenario, FWMG may offset its fees by an amount equal to the aggregate commissions and 12b-1 fees earned by FWMG's *Supervised Persons* in their individual capacities as registered representatives of a FINRA-member firm.

## **ITEM 6**

### **PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

Neither FWMG nor any supervised person of FWMG accepts performance-based fees.

## **ITEM 7**

### **TYPES OF CLIENTS**

FWMG's clients shall generally include individuals, pension and profit-sharing plans, trusts, and business entities. FWMG does not impose a stated minimum fee or minimum portfolio value for starting and maintaining an investment management relationship.

Certain third-party advisers may, however, impose more restrictive account requirements and varying billing practices than FWMG. In these instances, FWMG may alter its corresponding account requirements and/or billing practices to accommodate those of the third-party advisers.

## **ITEM 8**

### **METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

#### **A. Methods of Analysis and Investment Strategies**

FWMG limits its services to the referral of the referred parties to third-party advisers. Accordingly, the Firm does not utilize any methods of analysis or investment strategies. However, referred parties should be aware that investing in securities involves the potential for losses. Referred parties will receive the disclosure brochure from the third-party adviser that they engage. Referred parties should review the disclosures of those third-party advisers.

#### **B. Risk of Loss**

Investing in securities involves the risk of loss. Clients should be prepared to bear potential losses.

##### *Mutual Funds and ETFs*

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their *pro rata* NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 20,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

#### *Use of third-party advisers*

FWMG recommends the use of *third-party advisers*. In these situations, FWMG does not conduct ongoing due diligence of such advisers, but such recommendations rely to a great extent on the third-party advisers' ability to successfully implement their investment strategies. In addition, FWMG does not have the ability to supervise the third-party advisers.

### **C. Recommendation of a Particular Type of Security**

FWMG does not recommend any particular type of security.

## **ITEM 9 DISCIPLINARY INFORMATION**

Neither FWMG, nor any of its management persons have been the subject of any disciplinary actions.

## **ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

### **A. Broker-Dealer Registration**

FWMG's sole principal is not a registered representative of a FINRA-member firm.

**B. Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor Registration**

Neither FWMG, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

**C. Material Relationships and Conflicts of Interests with Industry Participants**

**LICENSED INSURANCE AGENCY/AGENT**

FWMG has arrangements that are material to its advisory or its clients with a related person who is an insurance agent. In this regard, FWMG's principal, Peter Florio is a licensed insurance agent, and in such capacity, may introduce clients to insurance agencies to obtain certain insurance-related products. Accordingly, FWMG does not exercise any discretionary authority with respect to a client's decision to obtain such insurance-related products but may receive fees in connection therewith.

**D. Material Conflicts of Interest Relating to Other Investment Advisers**

The recommendation by FWMG's principal that a client purchase an insurance commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from FWMG or its principal. Clients are reminded that they may purchase insurance products recommended by FWMG through other, non-affiliated insurance agents. FWMG does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients.

**ITEM 11**

**CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS  
AND PERSONAL TRADING**

**A. Code of Ethics**

FWMG has adopted a Code of Ethics (the "Code of Ethics"). The Code of Ethics is designed to ensure that FWMG employees comply with applicable federal securities laws and place the interests of clients first in conducting personal securities transactions. The Code of Ethics imposes certain restrictions on securities transactions in the personal accounts of covered persons to help avoid conflicts of interest, as described more fully below. A copy of the Code of Ethics is available free of charge to any client upon request. Additionally, all FWMG employees are subject to the firm's policies and procedures. In addition, the Code of Ethics sets forth restrictions regarding confidential and proprietary information, information barriers, private investments, outside business activities and personal trading. All FWMG employees are required to comply with the Code of Ethics terms as a condition of continued employment.

**B. Recommending, Buying, or Selling Securities in which We or a Related Person Have a Material Financial Interest, Invest, or Buy or Sell at the Same Time; Conflict of Interests**

Neither FWMG nor any related person of FWMG recommends, buys, or sells for client accounts, securities in which FWMG or any related person of FWMG has a material financial interest.

FWMG and/or representatives of FWMG *may* buy or sell securities that are also recommended to clients.

**C. Personal Trading**

FWMG and its principals, partners, officers, employees, affiliates and other related parties (each a “FWMG Related Party”) are permitted to invest in their personal trading accounts subject to certain restrictions. FWMG Related Parties may transact in mutual funds, ETFs, stocks, bonds and securities that are not traded publicly including, but not limited to, privately held companies, hedge funds, venture capital funds and commodity pools.

FWMG requires certain personal securities transactions, specifically those related to equity securities to be subject to an enhanced pre-clearance process by various FWMG personnel, including the Chief Compliance Officer. This enhanced preclearance process of the personal trading activities of FWMG Related Parties includes an assessment of whether such transactions pose any actual or potential conflicts of interest with respect to transactions executed by FWMG.

FWMG’s Code also requires FWMG Related Parties to: 1) pre-clear certain personal securities transactions, 2) report personal securities transactions on at least a quarterly basis, and 3) provide FWMG with a detailed summary of certain holdings (both initially upon commencement of employment and annually thereafter) in which the FWMG Related Party has a direct or indirect beneficial interest.

**ITEM 12  
BROKERAGE PRACTICES**

**A. Selection of Broker-Dealers and Reasonableness of Compensation**

FWMG limits its services to referring the referred parties to third-party advisers. FWMG neither recommends broker-dealer firms to referred parties nor does it receive any commissions, soft dollars, client referrals or any other benefits from recommending broker-dealer firms to a client.

**B. Aggregating Orders for Various Client Accounts**

Not Applicable

**C. Trade Errors**

Trade and other clerical errors resulting in gains will be for the benefit of the client and will not be retained by FWMG. FWMG is under no obligation, however, to reimburse the client for trade and other clerical errors made by FWMG, its agents and affiliates, as such errors are considered by FWMG to be a cost of doing business.

While FWMG is under no obligation to reimburse the client for trade and other clerical errors made by FWMG, its agents and affiliates, any correction of a trade or other clerical error will only be made to the extent required so that the client does not incur a loss related to such error.

Notwithstanding the foregoing, FWMG will be obligated to reimburse the client for any trade or other clerical error resulting from FWMG's willful misconduct, gross negligence or material breach under the exculpation of liability and indemnification provisions of the Investment Management Agreements maintained with the client. FWMG, subject to its fiduciary obligations, will determine whether or not any trade or other clerical error is required to be reimbursed in accordance with such liability and exculpation provisions. FWMG, in its sole discretion, reserves the right to reimburse the client for any trade or other clerical error. FWMG's reimbursement of the client for any particular error will not constitute a waiver of any policy to cause the client to bear the losses from other trade or other clerical errors.

**ITEM 13  
REVIEW OF ACCOUNTS**

**A. Periodic Review of Client Accounts**

As the Firm limits its services to referral services, the Firm does not have any client accounts to review. The Firm also does not provide account statements or reports to referred parties.

**B. Additional Review of Client Accounts**

Not Applicable

**C. Contents and Frequency of Account Reports to Clients**

FWMG may provide a written periodic report summarizing account activity and performance.

For those clients to whom FWMG provides financial planning and/or consulting services will receive reports from FWMG summarizing its analysis and conclusions as requested by the client or otherwise agreed to in writing by FWMG.

**ITEM 14**  
**CLIENT REFERRALS AND OTHER COMPENSATION**

**A. Economic Benefits for Providing Services to Clients**

FWMG does not accept an economic benefit from anyone for providing advisory services to its clients. In addition, FWMG does not provide compensation to any third-party solicitor for referrals.

FWMG itself, however, acts as a solicitor for third-party advisers and receives an ongoing referral/solicitation fee for referrals where the referred party establishes an advisory relationship with the third-party adviser to which the Firm provided solicitation services. This fee generally constitutes a portion of the advisory fee paid by a referred party to the third-party adviser. The referral fee does not result in any additional charge to the client.

FWMG has a conflict of interest when making referrals to third-party advisers because it has an incentive to make a referral to the investment adviser who agrees to pay the Firm the highest referral fee. The Firm addresses this conflict of interest by clearly disclosing the existence of a solicitation arrangement to the referred party so that the referred party can assess the inherent conflict of interest and make a fully informed decision as to which third-party adviser, if any, to select. Specifically, the Firm or the third-party adviser provides a disclosure document to the referred party prior to the execution of an advisory agreement with the third-party adviser, containing the Firm's name (as solicitor), the name of the third-party adviser, the nature of the relationship, including any affiliation, between the Firm and the third-party adviser, a statement that the Firm will be compensated for its solicitation services by the third-party adviser, and the terms of such compensation arrangement, including a description of the compensation to be paid to the Firm.

**B. Compensation to Non-Supervised Persons for Client Referrals**

If a client is introduced to FWMG by either an unaffiliated or an affiliated solicitor, FWMG may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Any such referral fee shall be paid solely from FWMG's investment management fee and shall not result in any additional charge to the client.

If the client is introduced to FWMG by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of his/her/its solicitor relationship, and shall provide each prospective client with a copy of FWMG's written Brochure with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between FWMG and the solicitor, including the compensation to be received by the solicitor from FWMG.

**ITEM 15  
CUSTODY**

FWMG does not maintain custody of any client funds or securities.

**ITEM 16  
INVESTMENT DISCRETION**

FWMG does not accept discretionary authority to manage securities accounts on behalf of clients. As stated previously, the Firm's limits its services to the referral of referred parties to third-party advisers.

**ITEM 17  
VOTING CLIENT SECURITIES**

FWMG does not vote client proxies. Therefore, although FWMG may provide advisory services relative to client investment assets, FWMG's clients maintain responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. FWMG and/or the client shall correspondingly instruct each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

**ITEM 18  
FINANCIAL INFORMATION**

**A. Balance Sheet**

FWMG does not solicit fees of more than \$1,200, per client, six months or more in advance.

**B. Contractual Commitments to Our Clients**

FWMG is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.

**C. Bankruptcy Petitions**

FWMG has not been the subject of a bankruptcy petition.

**ANY QUESTIONS:** FWMG's Chief Compliance Officer, Peter Florio, remains available to address any questions that a client may have regarding the above disclosures and arrangements.

**ITEM 19**  
**REQUIREMENTS FOR STATE REGISTERED ADVISERS**

**CEO/CCO/PRINCIPAL**

- **PETER FRANK FLORIO, CFP®, CLU®, ChFC®, CExP™, CLTC®, LUTCF®** (Born 1954)

**Educational Background**

St. John's University – B.S.  
Hofstra University – MBA  
Business Enterprise Institute – CExP  
American College – LUTCF  
American College – CLU  
American College – ChFC  
Certified Financial Planner Board of Standards – CFP  
Certification for Long Term Care – CLTC

**Business Experience**

The Florio Wealth Management Group – CEO – April 1986 – Present  
Licensed Life, Accident and Health Insurance Agent – April 1986 – Present  
MML Investors Services, Inc. – Registered Representative – April 1986 – June 2017

**Performance-Based Fees**

The firm does not charge performance-based fees.

**Disciplinary Actions**

The firm nor any management person has been involved in any disciplinary events requiring disclosure.

**Other Financial Industry Activities and Affiliations**

The firm nor any management person has a relationship with any issuer of securities that is not listed in Item 10.C. of Part 2A.