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Coco Enterprises, LLC

**Form ADV Part 2A – Firm Brochure**

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March 30, 2022

This Brochure provides information about the qualifications and business practices of Coco Enterprises, LLC. If you have any questions about the contents of this Brochure, please contact us at (406) 862-9400. 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.

Coco Enterprises, LLC is a registered investment adviser. Registration does not imply any level of skill or training.

Additional information about Coco Enterprises, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Our firm's CRD # is 165775.

## Item 2: Material Changes

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Investment advisers are required to update this brochure when material changes occur and at least annually and, if necessary, deliver to its existing clients a copy of its updated brochure, free of charge; or prepare and deliver a Summary of Material Changes reporting material changes made to this brochure since the last annual update. An offer to deliver a copy of the updated brochure, free of charge, will also be included in this Summary of Material Changes document. If no material changes have been made to the brochure the adviser is not required to complete this Item.

If necessary, Coco Enterprises, LLC will prepare this Item as a separate document from its brochure; material changes are not identified and discussed here.

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## Item 4: Advisory Business

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### Description of Advisory Firm

Coco Enterprises, LLC is a registered investment adviser. We were founded in September of 2009 and first registered as an Investment Adviser directly with individual states in January of 2013. We have grown considerably and at the end of 2020 we became eligible to register with the Securities and Exchange Commission (SEC). Our registration with the SEC became effective in May 2021. Joe Coco is the principal owner of the firm. We employ 3 investment adviser representatives: Joe Coco, Tom Schuch, and Drew Coco. You can learn more about these individuals in the supplements provided in addition to this brochure. As of December 31, 2021, Coco Enterprises, LLC managed approximately \$168,500,000.00 of client investment assets on a discretionary basis.

### Types of Advisory Services

Coco Enterprises, LLC offers the following services:

**Wealth Management Services** We provide ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. These services include, but are not limited to, the following:

- Investment strategy
- Security selection
- Regular and/or continuous portfolio monitoring

We evaluate the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels will be documented in the Investor Profile Questionnaire, which is completed by the client; or, completed by the advisor during the due diligence process. Additionally, clients may impose reasonable restrictions on their accounts.

We will periodically review your investment portfolio and implement changes deemed appropriate. We may change the target asset class allocation and/or the specific assets held in your investment portfolio. Coco Enterprises, LLC provides this service on a discretionary basis and will not give advance notice or seek your consent for any changes made to the investment portfolio.

Our clients are responsible for informing Coco Enterprises, LLC of any changes in their financial circumstances, investment objectives, and any other information provided. We encourage our clients to notify us promptly of any transactions or holdings that appear to be in error or inconsistent with their investment objectives.

**Financial Planning Services** Coco Enterprises, LLC also offers and provides financial planning services for an hourly fee. We have found clients generally are seeking guidance on solving a specific financial problem or issue such as: should I sell my rental property, is my family member's investment portfolio allocated or managed appropriately, how can I help pay my grandchild's

college tuition, etc.? However, if requested, we can provide a comprehensive financial plan designed to assist the client in evaluating their current financial status and recommendations to achieve their stated financial goals and objectives.

Additional areas of concern we are often presented with are:

- Personal: Family records, budgeting, personal liability, estate information and financial goals.
- Death & Disability: Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.
- Retirement: Analysis of current strategies and investment plans to help the client achieve his or her retirement goals.
- Investments: Analysis of investment alternatives and their effect on a client's portfolio.
- Insurance: Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.

In delivering this service our clients may or may not receive written recommendations or a detailed plan. What we deliver will depend upon the complexity of the problem or issue presented and the specific requests of the client.

**WealthScope Financial Consulting Services** In providing our WealthScope Financial Consulting Service Coco Enterprises, LLC assists our clients in assessing their overall financial situation and will coach clients on personal finance, all in an effort to help our clients obtain their financial goals and stay accountable. With this service, we help these clients monitor their financial accounts with money management software and monthly we conduct a 15-minute call to discuss any financial or life changes and progress made or setbacks. In addition, we will conduct an in-depth review with the client annually.

**Educational Seminars** We present various educational seminars on various topics, including both investment and non-investment subjects. The seminars are generally open to the public.

**ERISA CONSIDERATIONS.** In rendering investment advice to retirement accounts that may be subject to ERISA regulation:

Coco Enterprises, LLC is acting as a fiduciary as defined in ERISA 29 USC § 1002 (21) and applicable rules found @ 29 CFR 2510.3-21 and as a registered investment adviser.

We will act with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of like character and with like aims, based on the investment objectives, risk tolerance, financial circumstances and needs of the client, without regard to our interests.

Compensation for our services will not exceed "reasonable" compensation within the meaning of ERISA section 408(b)(2) and Code section 4975(d)(2).

At the time in which a communication is made, and in light of the circumstances at that time, Coco Enterprises, LLC will not mislead its clients in its communications.

We believe we apply care, skill, prudence, and diligence in rendering financial and investment advice to all accounts of our clients, not just retirement plan accounts and IRAs. We will always strive to keep our compensation reasonable and free from conflict and we will always try to never mislead our clients in any communications, again, regardless of the types of accounts our clients hold.

## Item 5: Fees and Compensation

How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

### Wealth Management Services Fee

Our Wealth Management Service Fee is based on the market value of the client's assets under management. We apply the following fee schedule:

<b>Household Assets Under Management</b>	<b>Annual Advisory Fee</b>
\$0-\$99,999	1.85%
\$100,000-\$249,999	1.50%
\$250,000-\$499,999	1.35%
\$500,000-\$749,999	1.25%
\$750,000-\$999,999	1.10%
\$1 Million - \$2 Million	1.00%
Above \$2 Million	Negotiable

#### FEE CALCULATION EXAMPLE:

<b>Portfolio Value</b>	<b>Fee Rate</b>	<b>Quarterly Fee</b>	<b>Annual Fee</b>
<b>\$255,000</b>	1.35%	$[(\$255,000 \times .0135) = \$3,442.50/4] = \$860.63$	\$3,442.50

This fee is negotiable. Fees are based on the market value of the portfolio at the end of the previous quarter. Fees are billed and payable quarterly, in advance. No increase in the annual fee shall be effective without agreement from the client by executing a new agreement or amending their current advisory agreement.

Advisory fees are deducted directly from client accounts. We will obtain authorization from you to instruct the broker-dealer/custodian to withdraw our fee from your account in the investment advisory agreement we execute. This authorization is also granted and agreed upon by you in the broker-dealer/custodian account application. The monthly/quarterly account statement delivered to you by the custodian will reflect the fee deduction.

Accounts opened or closed during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. If you wish to terminate the agreement entered into with Coco Enterprises, LLC within five business days of entering the agreement, no fee or penalty will be assessed. After five business days, the agreement may be terminated with written notice at least one month in advance. Any unearned fees collected will be returned.

**Return of prepaid fee in the event of Agreement termination example.** We will return any unearned fee as calculated below:

Billing Period	Market Value of Assets Under Management as of March 31	Quarterly Fee Paid in Advance	Agreement Termination Date	# of Unearned Days	Calculated Fee to be Returned [(\$860.63/91) X 51]
2 <sup>nd</sup> Quarter April 1 <sup>st</sup> – June 30 <sup>th</sup>	\$255,000.00	\$860.63	May 10	51	\$482.33

### **Financial Planning Fee**

The fee for our Financial Planning service is \$175.00 per hour; however, it may be negotiated based on the level of complexity and expected time the project may take to complete. Half of the estimated total project fee is due at commencement of work with the remainder due at completion, however we do not request or accept prepayment of fees exceeding \$1,200.00 per client, six months or more in advance.

### **WealthScope Financial Consulting Service Fee**

The fee for our WealthScope Financial Consulting Services is \$50.00 per month. This fee is billed monthly in advance. This fee is negotiable.

### **Educational Seminars**

The fee to attend an educational seminar varies. It can range from \$0.00 to \$100.00 per seminar.

### **Other Types of Fees and Expenses**

Coco Enterprises, LLC recommends Wealth Management clients open and maintain accounts at TD Ameritrade as custodian for client assets. The custodian provides institutional trading and custody services, which services generally are not available to retail investors (see Item 12 Brokerage practices for additional information). TD Ameritrade does charge transaction fees for investment trades placed in client accounts; however, Coco Enterprises, LLC will pay these transaction costs for our clients. Transaction fees will not be deducted from your account.

If you direct brokerage to a broker-dealer other than TD Ameritrade (see Directed Brokerage in Item 12. Brokerage Practices) we will not pay the transaction fees charged by the directed broker-dealer, as we do for those transactions executed through TD Ameritrade. The client will pay the transaction fees charged by the directed broker-dealer.

It is important to note, the fact that we pay our clients' transaction costs presents a conflict of interest. Clients should understand that the cost to us for transaction charges may be a factor we consider when deciding which securities to select and how frequently to place transactions. We may be inclined to recommend those securities with lower transaction costs or to not place necessary trades because our costs will increase. That said, we are committed to our fiduciary duty to place our clients' interests before our own and will recommend transactions we believe will help our clients achieve their investment objectives with no consideration given to the costs we may incur.

Clients may incur additional charges imposed by custodians, broker-dealers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund transfer fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees which are disclosed the prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we will not receive any portion of these fees, commissions, and costs.

We recommend clients open and maintain their advisory account(s) at TD Ameritrade, however we are not affiliated with TD Ameritrade in any way. Item 12 further describes our relationship with TD Ameritrade and the factors we consider in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

## Item 6: Performance-Based Fees and Side-By-Side Management

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Performance-based fees are based on a negotiated share of the capital appreciation of a client's account and are charged in addition to an investment advisers standard fee. We do not offer performance-based fees.

## Item 7: Types of Clients

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We offer our investment advisory services to individuals, high net worth individuals, family offices, pension and profit-sharing plans, charitable organizations, trusts, corporations and other businesses or organizations. We currently do not have a minimum account size requirement; however acceptance of a client relationship is at our discretion.

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

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Our primary methods of investment analysis are technical, fundamental, and cyclical.

**Technical analysis** involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may underperform other trading methods when fundamental factors dominate price moves within a given market.

**Fundamental analysis** involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

**Cyclical analysis** is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

### **Material Risks Involved**

**All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

**Limited markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.



**Concentration Risk:** Certain investment strategies focuses on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation:** Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

### **Risks Associated with Securities**

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Common stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Bank Obligations** including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

**Options and other derivatives** carry many unique risks, including time-sensitivity, and can result in the complete loss of principal.

**Real-Estate linked investments** may be especially illiquid and subject to specific geographic risk.

**Oil and Gas Interests** may lose value due to changes in commodity prices, costs associated with the transport of oil/gas, seasonal factors or technological advances that impact the demand for oil and gas.

**Investment Companies Risk.** When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or

below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. We have no control over the risks taken by the underlying funds.

## Item 9: Disciplinary Information

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We have no legal or disciplinary events to disclose.

## Item 10: Other Financial Industry Activities and Affiliations

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Neither Coco Enterprises, LLC, nor its management persons, are actively engaged in other financial industry activities or affiliations.

## Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

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Coco Enterprises, LLC has adopted a **Code of Ethics** emphasizing the firm's commitment to its fiduciary duty to always act in good faith and in the best interests of its clients. Our Code's primary tenets are summarized below:

**Objectivity:** We will provide unbiased advice and receive only fees for our investment advisory services. We will not receive any compensation contingent upon any client's purchase or sale of an investment product.

**Confidentiality:** We will not disclose to a third party the identity, affairs, or investments of any client unless the information concerns illegal activity, we are required by law to do so, or consented to by the client.

**Competence:** We will strive to maintain a high level of knowledge and will provide advice only in areas we are capable.

**Fairness:** We will deal fairly with all clients when providing investment information and making investment recommendations.

**Clients' Investment Priorities Over Firm's Own Interests:** We will give priority to investment recommendations made to the client over those that benefit our own interests.

**Suitability:** We will make a reasonable inquiry into a client's or prospective client's investment experience, risk and return objectives, and financial constraints prior to making any investment recommendation and we will reassess and update this information regularly. We will determine if an investment recommendation is suitable based upon the client's financial situation and investment objectives prior to making any investment recommendation. We will assess the suitability of investment recommendations in the context of the client's total portfolio.

**Integrity & Honesty:** We will not engage in any professional conduct involving dishonesty, fraud or deceit or commit any act that reflects adversely on our professional reputation, integrity, or competence.

**Regulatory Compliance:** We will strive to maintain compliance with applicable State and Federal securities industry regulations.

**Full Disclosure:** We will fully describe its method of compensation and total cost of investment recommendations. We will make full and fair disclosure of all matters or conflicts of interest that could reasonably be expected to impair the independence and objectivity or interfere with our respective fiduciary duty to our clients.

Our Code of Ethics is available to our clients and prospective clients upon written request by contacting Joe Coco at the contact information found on the cover page of this brochure.

Coco Enterprises, LLC or its employees and representatives may invest in the same securities we recommend to our clients. We may buy or sell securities for client accounts at or about the same time we buy or sell securities for our own accounts.

Investing in securities our clients also invest in presents a potential conflict of interest because we also want the value of those securities to rise to benefit our own accounts. “Front-running” or “scalping” then becomes a possibility. The practice of “front-running” or “scalping” is when an investment adviser or employee of an investment adviser purchases a security for their own account(s) prior to purchasing in their clients’ accounts and then profitably selling the stock. We avoid “front-running” via always purchasing personnel and proprietary trades in one block order trade ticket (see Order Aggregation in Item 12. Brokerage Practices below).

We require firm personnel to adhere to our Code of Ethics and our fiduciary duty to always place our clients’ interests before our own. We require personnel to be cognizant of client trading activity and ensure transactions placed for proprietary accounts are appropriate prior to executing the proprietary trade. When the firm is aware of transacted or potential transactions in mutually owned securities, and if applicable and appropriate, we will ensure orders are placed in client accounts before our own. To detect and prevent improper proprietary trading we require applicable personnel periodically report security holdings and transactions.

Coco Enterprises, LLC does not directly buy securities from or sell securities to our clients (i.e. principal transactions). Neither Coco Enterprises, LLC nor any of its investment adviser representatives act as a general partner in a partnership. If so, we would not solicit clients to invest in the partnership. Neither Coco Enterprises, LLC nor any of its investment adviser representatives act as an investment adviser to an investment company we recommend to clients.

## Item 12: Brokerage Practices

### **RECOMMENDED BROKER-DEALER/CUSTODIAN**

Coco Enterprises, LLC generally will recommend clients open and maintain accounts at TD Ameritrade as custodian for client assets. The custodian provides institutional trading and custody services, which services generally are not available to retail investors. These services are available to independent investment advisors on an unsolicited basis and at no charge to them. Not all independent advisors recommend their clients maintain their accounts at particular custodians. Coco Enterprises, LLC participates in the advisory services program (ASP) of TD Ameritrade Institutional. While there is no direct link between the investment advice given and participation in the ASP program, economic benefits are received which would not be received if Coco Enterprises, LLC did not participate in the ASP.

Charles Schwab purchased TD Ameritrade in 2020. Schwab and TD Ameritrade are in the process of combining their complementary strengths. This transition is expected to take 18 – 36 months.

Until then Schwab and TD Ameritrade will continue to operate as two separate broker-dealers and clients of ours open and maintain their investment accounts at TD Ameritrade.

## **DISCUSSION OF BENEFITS TO COCO ENTERPRISES, LLC FOR USING TD AMERITRADE'S ASP**

The benefits provided by TD Ameritrade include assistance with practice management and assistance with the administration of client accounts, including but not limited to: (a) receipt of electronic duplicate client statements and client trade confirmations; (b) access to a trading desk servicing investment advisor firm participants exclusively, and providing research, pricing information, and other market data; (c) access to the investment advisor portion of their website which include practice management articles, comprehensive updates, and other financial planning related information and research materials; (d) access to other vendors (such as financial planning software vendors or providers of research) on a discounted fee basis through discounts arranged by the custodian; (e) permitting Coco Enterprises, LLC to access an electronic communication network for client order entry and to access client account information which may assist us with our back office functions, including recordkeeping and client reporting; and (f) conferences at which advisors and employees of our firm may attend (with no registration fee) and receive education on such issues as practice management, marketing, investment theory, financial planning, business succession, regulatory compliance, and information technology.

Participation in the custodian's program may also provide access to certain mutual funds, which generally require significantly higher minimum initial investments or are generally available to only institutional investors.

Many of these services may be used to service all or a substantial number of our clients' accounts. Educational, research, or other services provided by TD Ameritrade Institutional Services or mutual fund companies may benefit all of Coco Enterprises, LLC's clients or may benefit only some clients.

While as a fiduciary Coco Enterprises, LLC endeavors to act in its clients' best interests, our desire that clients maintain their assets at TD Ameritrade Institutional Services may be based in part on the benefits to our firm of the availability of some products and services (previously described) at no cost to us, or at reduced cost, and not solely on the nature, cost, or quality of custody provided by TD Ameritrade, and may create a potential conflict of interest. However, we have selected TD Ameritrade for their low fees relative to other large custodians. Also, please note that we prefer to use a custodian who possesses significant size and financial resources, for purposes of enhanced safety of client funds. For these reasons, a potentially lower cost custodian may not be recommended to clients by Coco Enterprises, LLC.

## **BROKERAGE FOR CLIENT REFERRALS**

Coco Enterprises, LLC does not receive client referrals from any broker-dealer or custodian.

## **CLIENT DIRECTED BROKERAGE**

Coco Enterprises, LLC requires clients open and maintain accounts at TD Ameritrade. Coco Enterprises, LLC is independently owned and operated and is not affiliated with TD Ameritrade.

We believe our recommendation of TD Ameritrade is in the best interest of our clients. This recommendation is supported by the scope, quality and price of TD Ameritrade's services. The conflicts of interest this recommendation may present are described and addressed above.

Coco Enterprises, LLC does not operate in such a manner that permits clients to direct brokerage to a broker-dealer other than TD Ameritrade, however we realize some special circumstances may exist that we may try to accommodate. Therefore, if so instructed by the client to execute trades through a particular broker-dealer other than TD Ameritrade, the client may not receive the best execution available, may pay higher commissions, may not be able to participate in aggregated trades, and we will not pay the transaction fees charged by the directed broker-dealer, as we do for those transactions executed through TD Ameritrade (see Other Types of Fees and Expenses in Item 5: Fees and Compensation). The client will pay the transaction fees charged by the directed broker-dealer.

## **ORDER AGGREGATION**

Client orders executed through the same broker dealer may be aggregated to achieve best execution. You will receive the average share price of all orders executed to fill the aggregated order. Individual transaction fees and commissions will not be affected. You will incur the same transaction fee or commission charge regardless if the order was aggregated or executed individually.

Trading activity *directed by clients* may not be aggregated simply because we may not be trading that same security in other accounts at that time.

In our investment actions we have no obligation (other than our obligation to deal fairly with all clients) to purchase or sell for a particular client account any security that we, our owners, representatives or employees may purchase for ourselves or other clients.

## **Item 13: Review of Accounts**

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Client accounts are reviewed on a quarterly basis by Joe Coco, CFP®, Managing Member, Chief Compliance Officer, and Investment Adviser Representative of the firm. During this review the account's performance is compared against like-managed accounts to identify any unacceptable performance deviation. Additionally, client-imposed restrictions are reviewed to confirm adherence to the restriction. Events that may trigger a special review are unusual performance, addition or deletions of client-imposed restrictions, excessive withdrawals, volatility in performance, etc.

Coco Enterprises, LLC will not provide written reports to the client on a periodic basis. However, we will provide certain reports as requested.

## Item 14: Client Referrals and Other Compensation

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Coco Enterprises, LLC receives an economic benefit from TD Ameritrade in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at TD Ameritrade. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12: BROKERAGE PRACTICES). The availability to us of TD Ameritrade's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Coco Enterprises, LLC and its representatives do not receive compensation for client referrals, nor do we compensate any person for client referrals. Our employees and investment adviser representatives are compensated with salary and do not receive any compensation in addition to their regular salary for client referrals.

## Item 15: Custody

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Under government regulation we are deemed to have custody of client assets if clients authorize us to instruct TD Ameritrade to deduct our investment advisory fees directly from their account. That said, Coco Enterprises, LLC does not take custody of our clients' funds or securities.

As explained in Item 12 above, we encourage our clients to open and maintain their investment accounts at TD Ameritrade. The custodian will send account statements quarterly, or more frequently, directly to the client. These account statements will reflect all securities held as well as any transactions that occurred in the account, including the deduction of our investment management fee. Clients should review the account statements received from their custodian and should compare them to any reports they receive from Coco Enterprises, LLC. Clients can contact us at the address or phone number on the cover of this brochure with any questions about their statements and reports.

## Item 16: Investment Discretion

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For those clients receiving Wealth Management Services, where we provide continuous and regular portfolio management and investment advice, we maintain limited power of authority to buy or sell securities without contacting the client for authorization prior to affecting the transaction (discretionary authority). Investment discretion is explained to clients in detail when the investment advisory relationship is established. At the start of the advisory relationship, the client will grant Coco Enterprises, LLC this limited power of attorney and discretionary trading authorization in the account opening documentation. Discretionary trading authority will also be granted and agreed upon in the investment advisory agreement executed with the client.

## Item 17: Voting Client Securities

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Coco Enterprises, LLC will not accept authority to vote client securities. Our clients maintain this responsibility. If our clients would like our opinion on a particular vote they may contact us at the

number listed on the cover of this brochure. In most cases, you will receive voting materials directly from the account custodian. However, in the event we were to receive any written or electronic voting materials, we will forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail.

## Item 18: Financial Information

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### **BALANCE SHEET**

We do not request or accept prepayment of fees exceeding \$1,200.00 per client, six months or more in advance and therefore are not required to include a balance sheet with this brochure.

### **FINANCIAL CONDITIONS REASONABLY LIKELY TO IMPAIR ABILITY TO MEET CONTRACTUAL COMMITMENTS TO CLIENTS**

Neither Coco Enterprises, LLC nor its management has any financial condition that is likely to reasonably impair our ability to meet contractual commitments to clients.