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**10/03/2024**

**FORM ADV PART 2  
BROCHURE**

**This brochure provides information about the qualifications and business practices of Kahn Financial Group. If you have any questions about the contents of this brochure, please contact us at 727-797-5551. 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 Kahn Financial Group is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Kahn Financial Group is 134802.**

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

## ***Material Changes***

### ITEM 2

There are no material changes in this brochure from the last annual updating amendment of Kahn Financial Group on 03/31/2023. Material changes relate to Kahn Financial Group policies, practices or conflicts of interests only.

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## ***Advisory Business***

Form ADV Part 2A, Item 4

Kahn Financial Group (KFG) offers a range of investment advisory services. These services are based on an initial gathering of client information in order to understand the client's current circumstances and future goals. KFG has been in business since 1999 and is owned by David Kahn.

We offer comprehensive financial planning with a focus on retirement and estate planning. We provide portfolio management for individuals and/or small businesses. We request of the client the appropriate financial information, such as current income, assets and liabilities, tax information, etc. We then provide a concise written financial plan that analyzes whether or not the client is on target to reach his/her retirement goals, based on agreed upon assumptions regarding rates of return, inflation, etc.

We believe in customizing our advisory services based on the goals of each client, as well as the time frame in which we are operating and the risk tolerance of each individual. While we attempt to achieve an acceptable rate of return for each client, our strategies put a priority on staying within the risk tolerance of each client. We primarily limit our advice to mutual funds.

We do not use wrap fee programs in the implementation of our investment advice.

KFG chooses not to manage any assets on a discretionary basis. As of December 2023, assets totaling \$92,774,530 .00 were being managed on a non-discretionary basis.

## ***Fees and Compensation***

Form ADV Part 2A, Item 5

The fees KFG will charge for financial planning services are dependent on the anticipated time and complexity of the plan. The fees will be determined in advance and will be disclosed to the client before executing the Investment Advisory Agreement. Fees will rarely depart from the established fee schedule but may do so in exceptional circumstances. It is possible a client will pay more or less for similar services than another client. If a client retains KFG on an hourly basis for plan development or consultation, the rate will range between \$100 to \$200 per hour (a lesser hourly fee may be charged for administrative and staff functions). If the client retains KFG to create a financial plan on a fixed fee basis, that fee will range between \$500 and \$4,000, depending on the complexity and comprehensiveness on the plan.

KFG provides investment advisory services using the Investment Management Program for Advisory Clients (IMPAC). This program provides the client with ongoing investment advice and monitoring of securities holdings. This is a fee-based account offered and administered through Raymond James & Associates, Inc (RJA), member NYSE/SIPC

The fee schedule for IMPAC is as follows:

First \$500,000	1.5% per year
Next \$4,500,000	1.0% per year
Over \$5,000,000	Negotiable

Transaction fees range from no fee to \$40.00. There are no transaction fees for mutual fund redemptions.

If the cash balance exceeds 20% of the Account Value as of the last business day of the quarter ("the valuation date") for three (3) consecutive quarterly valuation dates, the amount in excess of 20% is excluded from billing.

For those investors who meet the legally mandated net worth requirements to purchase it, private placement life insurance and/or variable annuity policies may be employed, if deemed of benefit to the investor based on the financial planning process. The fee schedule, based on the amount of dollars that are to be placed in such policies are as follows:

1.5% for the first \$10,000,000  
1.0% for the next \$15,000,000  
½% for the next \$25,000,000  
¼% for any additional dollars

The minimum contribution to such a policy is \$1,000,000. Compensation is due in part upon the signing of a separate planning agreement specific to PPLI and/or PPVA and part at the acceptance of the financial plan. The time of payment and the fee itself are negotiable.

The annual asset-based fee is paid quarterly in arrears or in advance at the choice of the client. For accounts billed in arrears, the asset-based fee is calculated on the account asset value on the last business day of the quarter for the previous quarter. KFG has the option to bill any management fees on a pro-rata basis for deposits made during a quarter. For accounts billed in advance, the asset-based fee is billed when the account is opened for the remainder of the current billing period based on the initial contribution. Thereafter, the quarterly asset-based fee is paid in advance based on the account asset value on the last business day of the previous quarter and is due the following business day. The client authorizes and directs Raymond James & Associates (RJA) **member NYSE/SIPC** as Custodian, to deduct asset-based fees from the client's account. If the client prefers, he may choose to be billed each quarter for the fees due. If paid in a timely fashion, the fees will not be deducted from the client's account.

Clients may incur a nominal charge per transaction for handling and postage. The client may also incur charges for other account services provided by Raymond James Financial Services, member FINRA/SIPC through RJA not deduction related to the execution and clearing of transactions including, but not limited to, IRA custodial fees, safekeeping fees, interest charges on margin loans and fees for legal or courtesy transfers of securities. KFG does not share in any of these additional charges paid to Raymond James Financial Services.

Clients should be aware that all mutual funds and insurance products available under the IMPAC program have their own separate management fees and operating expenses, which are disclosed in their respective prospectuses.

KFG works primarily with individuals and high net worth individuals as well as pension and profit sharing plans.

If fees have been paid in advance and the Investment Management agreement is terminated by providing written notice, the client will receive a refund of the portion of the prepaid asset-based fee which has not been utilized. If a client terminates the agreement within the first five (5) business days of entering into the agreement, all prepaid fees will be refunded. The written notice of termination should be sent to:

Kahn Financial Group  
1700 McMullen Booth Rd.  
Suite A-5  
Clearwater, FL 33759

While in most cases the investment advisor representative (IAR) invests the majority of client assets in mutual funds on a fee basis as described above, there are occasions when it is deemed appropriate to use other products that may pay a commission. The different types and amounts of compensation create a conflict of interest.

When making cost comparisons, clients should be aware that the combination of multiple mutual fund investments, advisory services, custodial and brokerage services available through each program may not be available separately or may require multiple accounts, documentation and fees. If an account is actively traded or the client otherwise may not qualify for reduced sale charges for fund purchases, the fees may be less expensive than separately paying the sales charges and fees. If an account is not actively traded or the client otherwise would qualify for reduced sales charges, the fees in these programs may be more expensive than if utilized separately.

IARs do not receive a financial incentive to recommend and sell proprietary mutual funds versus non-proprietary funds. However, because compensation structures vary by product type, IARs may receive higher compensation for certain product types.

KFG believes the charges and fees offered within the fee-based program are competitive with alternative programs available through other firms and/or investment sources yet makes no guarantee that the aggregate cost of a particular program is lower than that which may be available elsewhere.

Clients are free to execute any investment recommendations received from KFG at the broker of their choice and are not required to do so through KFG's broker RJFS.

Far less than 50% of the revenue of KFG is derived from commissions.

In certain instances, with certain products a commission is paid initially and for the first year after that the normally applicable fee is waived.

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

Form ADV Part 2A, Item 6

KFG does not accept performance-based fees.

## ***Types of Clients***

Form ADV Part 2A, Item 7

KFG works primarily with individuals, as well as with high net worth individuals. There is a \$25,000 minimum account value which can be waived by the firm.

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

Form ADV Part 2A, Item 8

KFG believes that there is no investment without risk. Even a FDIC insured CD may have the risk of the loss of purchasing power over time. Mutual funds, stocks, bonds, alternative investments, etc., can all potentially lose some or all of the client's investment. As each client has a different tolerance for these risks, the first step in formulating investment advice or in managing assets is determining their specific risk tolerance as well as the time frame for the investment and the goal or goals for the investment. We use a basic risk tolerance questionnaire and follow that up with discussing the above points. We then align the various investments to the result of that analysis.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond (fixed income) nature or stock (equity) nature, or a mix of multiple underlying security types.

We believe that mutual funds generally provide an appropriate balance between risk and reward. We analyze each fund we recommend to clients using the data available through subscribing to Morningstar and also using the proprietary mutual fund research of RJFS, as well as by attending various conferences and meeting with fund representatives. We attempt to locate funds with managers that over a period of years often out-perform their peers and their respective indexes. We also believe that a portfolio that is broadly diversified may lower the overall level of risk. To that end, in addition to a core holding of mutual funds, we believe that using alternative investments, for those clients meeting the minimum net worth requirements, will add to the diversification of an investment portfolio.

As it is very true that past performance is no guarantee whatsoever of future results, a mutual fund can lose a significant percentage of the funds being managed even if it has not happened in the past. Some alternative investments have varying levels of risk, some quite high with others moderate.

We do not engage in frequent trading. We are looking to achieve long term results while primarily avoiding speculative investments.

As mentioned above, we believe that while there is still significant risk in using mutual funds as the core holding, especially over a short period of time, the level of risk is moderated through diversification within each fund and through the use of several different funds with different investment objectives. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.



### ***Disciplinary Information***

Form ADV Part 2A, Item 9

There are not currently nor have there been in the past any legal or disciplinary events that would be material to a client's or prospective client's evaluation of the KFG advisory business or the integrity of our management.

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

Form ADV Part 2A, Item 10

The Investment Adviser Representatives of KFG are registered representatives of RJFS.

Registered representatives of RJFS are subject to FINRA rules that restrict them from conducting securities transactions away from RJFS. This creates a conflict of interests. It may be the case that RJFS charges a higher or a lower fee than another broker charges for a particular type of service such as transaction fees. If the client does not use RJFS, KFG reserves the right to not accept the account.

As a registered FINRA broker dealer, RJFS routes order flow through its affiliated broker dealer Raymond James & Associates, Inc. (RJA). RJA is obligated to seek best execution for all trades executed, but better executions may be available via another broker dealer based on a number of factors including volume, order flow and market timing activity.

The IARs of KFG are also licensed insurance agents with several insurance companies and conduct their insurance and annuity business through Raymond James Insurance Group (RJIG). If a client chooses to use an IAR in his individual capacity as an insurance agent, the individual IAR will receive a commission.

KFG does not recommend or select other investment advisers from which we receive compensation either directly or indirectly.

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

Form ADV Part 2A, Item 11

KFG has a Code of Ethics, which amongst other points, monitors the personal securities transactions of its employees, officers, directors and IARs. It sets forth standards of conduct and addresses potential conflicts of interest among Kahn Financial Group, its personnel and its advisory clients. Any client may request a copy of the KFG Code of Ethics. This may be done either by phone at 727-797-5551 or by mail at 1700 McMullen Booth RD. Suite A-5 Clearwater, FL 33759.

KFG does not have any material interest in any of the securities recommended to clients.

The IARs of KFG may invest in the same securities or related securities that they recommend to clients and may recommend securities at the same time that they are buying or selling the same securities. This could create a conflict of interest; however, that is handled by giving priority to client accounts. In the case of mutual funds, the most common security being used for the clients of KFG, all trade prices are determined at the end of the day. Thus, this would not create a conflict of interest.

## ***Brokerage Practices***

Form ADV Part 2A, Item 12

KFG receives proprietary RJFS research and third-party research from RJFS. This research is received as a benefit to KFG at no additional cost to KFG.

KFG does not have an incentive to recommend RJFS for the purpose of receiving this research.

Clients do not pay higher commissions for the purpose of KFG receiving this research.

KFG does not consider the receipt of client referrals in recommending RJFS.

The IARs of KFG are registered representatives of RJFS, a registered broker-dealer with FINRA, and may recommend RJFS to advisory clients for brokerage services. Registered representatives of RJFS are subject to FINRA Rule 3280 that restricts them from conducting securities transactions away from RJFS. Therefore, clients are advised that such IARs are limited to conducting securities transactions through RJFS. It may be the case that RJFS charges a higher or lower fee than another broker charges for a particular type of service, such as transaction fees.

As a registered FINRA broker dealer, RJFS routes order flow through its affiliated broker dealer Raymond James & Associates, Inc. (RJA). RJA is obligated to seek best execution pursuant to FINRA Rule 5310 for all trades executed, however, better executions may be available via another broker dealer based on a number of factors including volume, order flow and market making activity.

KFG does not aggregate trades as we do not manage clients' accounts on a discretionary basis. Each individual is contacted prior to any trade being executed.

## ***Review of Accounts***

Form ADV Part 2A, Item 13

Client accounts are reviewed at least annually to determine if the current investments are performing in an acceptable way, taking into account market conditions at that time. David Kahn, as the principal of KFG, will perform the annual reviews of his personal clients as well as oversee those of any other IAR at KFG.

Reviews will also be carried out if we become aware of any significant changes in any clients' situation or if the economic or investment environment changes significantly in any manner that could necessitate a more timely review.

A monthly statement of all client accounts, including asset allocation, performance information and account gains, losses and balances will be sent out by Raymond James & Associates, Inc (RJA).

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

Form ADV Part 2A, Item 14

KFG may receive compensation in the form of sponsorship fees for seminars, meetings or conferences from RJFS and from product sponsors such as limited partnerships, mutual fund companies, insurance companies and annuity sponsors. In the case of product sponsors, such fees generally entitle the sponsor to an allotted presentation to the IARs of KFG. While this creates a potential conflict of interest, the providers of such benefits are given to understand that this creates no obligation on the part of KFG.

KFG does not compensate anyone for client referrals.

### ***Custody***

Form ADV Part 2A, Item 15

KFG does not have custody of client funds. It does instruct Raymond James & Associates, Inc (RJA) as to the current fees to be debited from client accounts. KFG follows the safeguarding rules of appropriate

### ***Investment Discretion***

Form ADV Part 2A, Item 16

KFG does not accept discretionary authority to manage securities on behalf of clients. You are urged to carefully review and compare your account statements that you have received directly from your service provider with any reports you receive from our firm or online services.

### ***Voting Client Securities***

Form ADV Part 2A, Item 17

KFG does not have nor will accept authority to vote client securities.

***Financial Information***

Form ADV Part 2A, Item 18

KFG does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.