

DISCLOSURE BROCHURE

**Main Office Address:**

888 W. Big Beaver Rd.
Suite 1220
Troy, MI 48084

Tel: 888-267-1321
Fax: 800-876-5210

joel@citycenterfinancial.com

www.citycenterfinancial.com

This brochure provides information about the qualifications and business practices of City Center Advisors, LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 888-267-1321. 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 City Center Advisors, LLC (CRD #203513) is available on the SEC's website at www.adviserinfo.sec.gov

OCTOBER 14, 2024

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

Since the last filing of this brochure on July 9, 2024, the following changes have occurred:

- Item 4 has been updated with the firm's most recent assets under management calculation.
- Item 5 has been updated to reflect fees for asset management services will now be billed monthly in arrears based on the average daily balance of the previous month.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 888-267-1321 or by email at joel@citycenterfinancial.com.

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Form ADV – Part 2A – Firm Brochure

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Item 4: Advisory Business

Firm Description

City Center Advisors, LLC ("City Center Advisors") formerly Keystone Financial Partners, Inc. was founded in April of 2015 and became registered as an investment advisor in May of 2015. Frank Endris owns 7% of the firm and David Joel Hardin II, and David Joel Hardin each own 46.5% of the firm.

City Center Advisors is a fee based advisory firm. The firm's owners also sell insurance products for a commission through City Center Financial, an affiliated company. These practices represent conflicts of interest because they give an incentive to recommend products based on the commission and/or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to act in the best interest of their clients and will act in accordance with those responsibilities. Clients have the right to purchase these products and services through another insurance agent of their choosing.

Types of Advisory Services

ASSET MANAGEMENT

City Center Advisors offers discretionary asset management services to advisory Clients. City Center Advisors will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize City Center Advisors discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

When deemed appropriate for the Client, City Center Advisors may hire Sub-Advisors to manage all or a portion of the assets in the Client account. City Center Advisors has full discretion to hire and fire Sub-Advisors as they deem suitable. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and City Center Advisors. Sub-Advisors execute all trades on behalf of City Center Advisors in Client accounts. City Center Advisors will be responsible for the overall direct relationship with the Client. City Center Advisors retains the authority to terminate the Sub-Advisor relationship at City Center Advisors' discretion.

UNIFIED MANAGED ACCOUNT PROGRAM

We offer discretionary investment management services in a managed account program through Overlay Portfolio Management (the "OPM Program"). This OPM Program may consist of using model portfolio advisers, model portfolios or other investment options such as mutual funds and/or exchange-traded funds ("ETFs") to represent different investment strategies for managing your account. Each of these investment strategies is designed to meet a specific goal.

Prior to investing in the OPM Program, you will execute a discretionary investment management agreement with us setting forth the terms and conditions of our management of your investments within the OPM Program. Depending on the management services the client selects, the client will grant us limited discretionary authority to manage the client account through selection of an overlay manager ("Overlay Manager"), third party strategist ("Strategist") and/or third party managers ("Managers"; collectively, "Third-Party Service Providers"). In addition, the client will authorize the custodian to follow our instructions as well as instructions given by Overlay Manager to effect transactions, deliver securities, deduct fees and take other actions with respect to the client account. The client will not have a direct contractual relationship with the Overlay Manager or any other Third-Party Service Provider.

The timing of trades in the client account will primarily depend upon the model or changes in the model and, generally, will not take into consideration how long a client may have held the position indicated by the model.

We will retain the right to replace any Strategist or Manager on a discretionary basis. Depending on the service a client has selected, we will separately provide the client with the firm brochure (Part 2 of Form ADV) for the applicable Third-Party Service Provider(s) which includes information about their services, model portfolios, and investment strategies at or before the execution of our discretionary investment management agreement.

ERISA PLAN SERVICES

City Center Advisors provides service to qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and deferred compensation plans. City Center Advisors may act as 3(38) advisor and ERISA 3(38) Investment Manager in which it has discretionary management and control of a given retirement plan's assets. City Center Advisors would then become solely responsible and liable for the selection, monitoring and replacement of the plan's investment options.

1. Fiduciary Services are:

- City Center Advisors has discretionary authority and will make the final decision regarding the initial selection, retention, removal and addition of investment options in accordance with the Plan's investment policies and objectives.
- Assist the Client with the selection of a broad range of investment options consistent with ERISA Section 404(c) and the regulations thereunder.
- Assist the Client in the development of an investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan.
- Provide discretionary investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5).

2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. Client understands the City Center Advisors' assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, the City Center Advisors is not providing fiduciary advice as defined by ERISA to the Plan participants. City Center Advisors will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.
- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

City Center Advisors may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between City Center Advisors and Client.

3. City Center Advisors has no responsibility to provide services related to the following types of assets ("Excluded Assets"):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);
- Stock brokerage accounts or mutual fund windows;
- Participant loans;
- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to the Adviser on the ERISA Agreement. Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

SEMINARS

City Center Advisors holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given. City Center Advisors does not charge a fee for attendance to these seminars.

FINANCIAL PLANNING

City Center Advisors offers limited scope financial planning services to all clients. The services to be performed will be outlined in the financial planning agreement. City Center Advisors reserves the right to waive the fee should the Client implement the plan through City Center Advisors.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without prior written client consent.

Wrap Fee Programs

City Center Advisors does not sponsor any wrap fee programs.

Client Assets Under Management

City Center Advisors has the following Client assets under management:

| Discretionary Amounts: | Non-discretionary Amounts: | Date Calculated: |
|------------------------|----------------------------|--------------------|
| \$134,541,325 | \$0 | September 30, 2024 |

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

ASSET MANAGEMENT

City Center Advisors charges an annual investment advisory fee based on the total assets under management with a maximum annual fee of 2% of the assets managed. The annual fee may be negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

Fees are billed monthly in arrears based on the average daily balance of the previous month. For accounts opened or closed mid-billing period, fees will be prorated based on the day's services are provided during the given period. If margin or covered calls are utilized, the fees will be billed based on the gross asset value of the account. Clients may terminate their account within seven (7) business days of signing the Investment Advisory Agreement with no obligation and without penalty. Clients may terminate advisory services with thirty (30) days written notice. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

Legacy clients will continue to be billed quarterly in advance.

If Sub-Advisors are hired, there is no additional fee to the Client. When utilizing the unified managed account program through Overlay Portfolio Management, the total annual fee will not exceed 2% of the assets under management. Sub-advisor fees will generally range 0.10% - 0.90%.

ERISA PLAN SERVICES

The annual fees are based on the market value of the Included Assets and will not exceed 2%. The annual fee is negotiable and may be charged as a percentage of the Included Assets or as a flat fee. Fees may be charged quarterly or monthly in arrears or in advance based on the assets as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets). If the services to be provided start any time other than the first day of a quarter or month, the fee will be prorated based on the number of days remaining in the quarter or month. If this Agreement is terminated prior to the end of the billing cycle, City Center Advisors shall be entitled to a prorated fee based on the number of days during the fee period services were provided or Client will be due a prorated refund of fees for days services were not provided in the billing cycle.

The fee schedule, which includes compensation of City Center Advisors for the services is described in detail in Schedule A of the ERISA Plan Agreement. The Plan is obligated to pay the fees; however, the Plan Sponsor may elect to pay the fees. Client may elect to be billed directly or have fees deducted from Plan Assets. City Center Advisors does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, City Center Advisors will disclose this compensation, the services rendered, and the payer of compensation. City Center Advisors will offset the compensation against the fees agreed upon under the Agreement.

SEMINARS

City Center Advisors does not charge fees for seminars.

FINANCIAL PLANNING

Fees are non-negotiable and are billed 50% in advance with the balance due upon delivery of the plan. Services are completed and delivered inside of ninety (90) days contingent upon timely delivery of all required documentation. Client may cancel within seven (7) business days of signing Agreement with no obligation and without penalty. If the Client cancels after seven (7) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to City Center Advisors. City Center Advisors reserves the right to waive the fee should the Client implement the plan through City Center Advisors.

HOURLY FEES

Limited scope planning services are also available for a fee of \$500 per hour.

For Clients located in Pennsylvania: If a client does not receive a copy of this brochure at least 48 hours prior to signing an agreement, the client has five business days in which to cancel the agreement, without penalty.

Client Payment of Fees

Fees for asset management services are deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

Fees for ERISA services are either deducted from the Plan assets or paid direct to City Center Advisors. The Client must consent in advance to direct debiting of Plan assets.

Fees for Financial Plans are paid direct to City Center Advisors.

Additional Client Fees Charged

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities and exchange-traded funds. These charges may include Mutual Fund transactions fees, postage and handling and miscellaneous fees. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Prepayment of Client Fees

City Center Advisors does not require any prepayment of fees of more than \$1200 per Client and six months or more in advance.

External Compensation for the Sale of Securities to Clients

Investment Advisor Representatives of City Center Advisors have financial industry affiliated businesses as licensed insurance agents. More than 50% of their time is spent in their insurance practices. From time to time, they will offer clients advice or products from this activity. The representatives of the firm receive commissions from insurance companies on the products sold.

These practices represent conflicts of interest because they give an incentive to recommend products/services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to act in the best interest of their clients and will act in accordance with those responsibilities. Clients have the right to purchase these products/services through another insurance agent of their choosing.

Item 6: Performance-Based Fees and Side-by-Side Management

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Item 7: Types of Clients

Description

City Center Advisors generally provides investment advice to individuals, high net worth individuals and businesses.

Account Minimums

City Center Advisors generally requires a minimum of \$25,000 to open an account, but reserves the right to waive this at their sole discretion.

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

Methods of Analysis

City Center Advisors uses Modern Portfolio Theory. Modern Portfolio Theory is the theory of finance that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the

proportions of various assets. The risk with Modern Portfolio Theory is that investments are made based on forecasting models that don't adapt to ever changing market conditions.

The main sources of information include Morningstar, financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Investment Strategy

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investing in securities involves risk of loss that clients should be prepared to bear. Investors face the following investment risks and should discuss these risks with City Center Advisors:

- *Market Risk:* The prices of securities held by mutual funds in which Clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the Client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources,

and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a Client invests in open end mutual funds or ETFs, the Client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, 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 or (ii) 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. Adviser has no control over the risks taken by the underlying funds in which Client invests.
- *Foreign Securities Risk:* Funds in which Clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.
- *Long-term purchases:* Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically, the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally, there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject

to purchasing power risk — the risk that your investment's return will not keep up with inflation.

- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Options Trading:* The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur in the relevant time period (i.e., before the option expires). Additionally, options are less tangible than some other investments. An option is a "book-entry" only investment without a paper certificate of ownership. The risks of covered call writing include the potential for the market to rise sharply. In such case, the security may be called away and the account will no longer hold the security. When purchasing options there is the risk that the entire premium paid for the option can be lost if the option is not exercised or otherwise sold prior to the option's expiration date. When selling ("writing") options, the risk of loss can be much greater if the options are written uncovered ("naked"). The risk of loss can far exceed the amount of the premium received for an uncovered option and in the case of an uncovered call option the potential loss is unlimited.
- *Trading on Margin:* In a cash account, the risk is limited to the amount of money that has been invested. In a margin account, risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a margin account depreciates, the client will be required to deposit additional cash or make full payment of the margin loan to bring account back up to maintenance levels. Clients who cannot comply with such a margin call may be sold out or bought in by the brokerage firm.
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- *Leveraged Risk:* The risks involved with using leverage may include compounding of returns (this works both ways – positive and negative), possible reset periods, volatility, use of derivatives, active trading and high expenses.

The risks associated with utilizing Sub-Advisors include:

- Manager Risk
 - Sub-Advisor fails to execute the stated investment strategy
- Business Risk
 - Sub-Advisor has financial or regulatory problems
- The specific risks associated with the portfolios of the Sub-Advisor's which is disclosed in the Sub-Advisor's Form ADV Part 2.

Item 9: Disciplinary Information

Criminal or Civil Actions

The firm and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

The firm and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

Pursuant to Mass. Code Regs. 12.205(8)(d), Client can obtain the disciplinary history of City Center Advisors or its representatives upon request of the Massachusetts Securities Division.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

City Center Advisors has no employees that are registered representatives of a broker dealer.

Futures or Commodity Registration

Neither City Center Advisors nor its employees are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Members David Joel Hardin and David Joel Hardin II are owners of City Center Financial, LLC, an insurance agency. Approximately 50% of David Joel Hardin II, and David Joel Hardin's time is spent in their insurance practice. From time to time, they will offer clients advice or products from those activities. They will receive commissions from insurance companies on the products sold.

Member Frank Endris is also a licensed insurance agent with City Center Financial, LLC. More than 50% of his time is spent in his insurance practice. From time to time, he will offer clients advice or products from those activities. Mr. Endris receive commissions from insurance companies on the products sold.

These practices represent conflicts of interest because they give an incentive to recommend products/services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to act in the best interest of their clients and will act in accordance with those responsibilities. Clients have the right to purchase these products/services through another insurance agent or investment advisor of their choosing.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

City Center Advisors may utilize the services of a Sub-Advisor to manage Clients' investment portfolios. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and City Center Advisors. Sub-Advisors execute all trades on behalf of City Center Advisors in Client accounts. City Center Advisors will be responsible for the overall direct relationship with the Client. City Center Advisors retains the authority to terminate the Sub-Advisor relationship at City Center Advisors' discretion.

In addition to the authority granted to City Center Advisors under the Agreement, Client will grant City Center Advisors full discretionary authority and authorizes City Center Advisors to select and appoint one or more independent investment advisors ("Advisors") to provide investment advisory services to Client without prior consultation with or the prior consent of Client. Such Advisors shall have all of the same authority relating to the management of Client's investment accounts as is granted to City Center Advisors in the Agreement. In addition, at City Center Advisors' discretion, City Center Advisors may grant such Advisors full authority to further delegate such discretionary investment authority to additional Advisors. City Center

Advisors ensures that before selecting other advisers for Client that the other advisers are properly licensed or registered as an investment adviser.

This practice represents a conflict of interest as City Center Advisors may select Sub-Advisors who charge a lower fee for their services than other Sub-Advisors requiring City Center to share a smaller portion of the fee with the Sub-Advisor. This conflict is mitigated by disclosures, procedures, and by the fact that City Center Advisors has a fiduciary duty to place the best interest of the Client first and will adhere to their code of ethics.

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

Code of Ethics Description

The employees of City Center Advisors have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of City Center Advisors employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of City Center Advisors. The Code reflects City Center Advisors and its supervised persons' responsibility to act in the best interest of their client.

One area which the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

City Center Advisors's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of City Center Advisors may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

City Center Advisors' Code is based on the guiding principle that the interests of the client are our top priority. City Center Advisors' officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When the conflict arises, it is our obligation to put the client's interests over the interests of either employees or the company.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

City Center Advisors and its employees do not recommend to clients securities in which we have a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

City Center Advisors and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as trading ahead of client trades, employees are

required to disclose all reportable securities transactions as well as provide City Center Advisors with copies of their brokerage statements.

The Chief Compliance Officer of City Center Advisors is David Joel Hardin II. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

City Center Advisors does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, employees may buy or sell securities at the same time they buy or sell securities for clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide City Center Advisors with copies of their brokerage statements.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

City Center Advisors will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. City Center Advisors will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. City Center Advisors relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by City Center Advisors. City Center Advisors does not receive any portion of the trading fees.

City Center Advisors will require the use of Charles Schwab & Co., Inc.

- *Directed Brokerage*
City Center Advisors does not allow directed brokerage accounts. Not all advisors require their clients to direct brokerage.
- *Best Execution*
Investment advisors who manage or supervise Client portfolios have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to affect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.
- *Soft Dollar Arrangements*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by City Center Advisors from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. As permitted by Section 28(e) of the Securities Exchange Act of 1934, City Center Advisors receives economic benefits as a result of commissions generated from securities transactions by the broker-dealer from the accounts of City Center Advisors. These benefits include both proprietary research from the broker and other research written by third parties. These are benefits to the firm because the firm does not have to produce or pay for research, products or services.

A conflict of interest exists when City Center Advisors receives soft dollars. The firm may have an incentive to select or recommend a broker-dealer based on the firm's interest in receiving the research or other products and services, rather than on the clients' interest in receiving the most favorable execution. However, this conflict is mitigated by the fact that City Center Advisors has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

City Center Advisors utilizes the services of custodial broker dealers. Economic benefits are received by City Center Advisors which would not be received if City Center Advisors did not give investment advice to Clients. These benefits include: A dedicated trading desk, a dedicated service group and an account services manager dedicated to City Center Advisors' accounts, ability to conduct "block" Client trades, electronic download of trades, balances and positions, duplicate and batched Client statements, and the ability to have advisory fees directly deducted from Client accounts.

Aggregating Securities Transactions for Client Accounts

City Center Advisors is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of City Center Advisors. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis. If aggregation is not allowed or infeasible and individual transactions (e.g., withdrawal or liquidation requests, odd-late trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Accounts reviews are performed quarterly by the Chief Compliance Officer, David Joel Hardin, II of City Center Advisors. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target bands of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of clients' accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

Content of Client Provided Reports and Frequency

Clients receive account statements no less than quarterly for managed accounts and are issued by the custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. Clients have access to their individual performance prepared by Black Diamond, through their online portal.

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

City Center Advisors receives additional economic benefits from external sources as described above in Item 12.

Advisory Firm Payments for Client Referrals

City Center Advisors does not pay for client referrals.

Item 15: Custody

Account Statements

City Center Advisors does not maintain custody of client funds and/or securities. All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to carefully review and compare the account statements received directly from their custodians to any documentation or reports prepared by City Center Advisors.

City Center Advisors is deemed to have constructive custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of City Center Advisors.

Item 16: Investment Discretion

Discretionary Authority for Trading

City Center Advisors requires discretionary authority to manage securities accounts on behalf of Clients. City Center Advisors has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The client will authorize City Center Advisors discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

If management services that utilize an Overlay Manager are utilized, Client will grant the Overlay Manager complete and unlimited discretionary trading authority with respect to the account. The Overlay Manager will be solely responsible for the day-to-day investment management decisions for the account, and neither City Center Advisors nor any model portfolio adviser will be responsible for making the investment trading decisions.

City Center Advisors allows Client's to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to City Center Advisors in writing.

Item 17: Voting Client Securities

Proxy Votes

City Center Advisors does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent. City Center Advisors personnel may answer client questions regarding proxy-voting matters in an effort to assist the client in determining how to vote the proxy. However, the final decision of how to vote the proxy rests with the client. Client may call City Center Advisors at 719-622-6290 with questions.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided because City Center Advisors does not serve as a custodian for client funds or securities and City Center Advisors does not require prepayment of fees of more than \$1200 per client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

City Center Advisors has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

Bankruptcy Petitions during the Past Ten Years

Neither City Center Advisors, nor any management have had any bankruptcy filings in the last 10 years.

ITEM 1 COVER PAGE

SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

David Joel (“Joel”) Hardin II, APMA®



Main Office Address:

888 W. Big Beaver Rd.
Suite 1220
Troy, MI 48084

Tel: 888-267-1321
Fax: 800-876-5210

joel@citycenterfinancial.com

This brochure supplement provides information about David Joel Hardin II and supplements the City Center Advisors, LLC brochure. You should have received a copy of that brochure. Please contact David Joel Hardin II if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about David Joel Hardin II (CRD #6633030) is available on the SEC's website at www.adviserinfo.sec.gov.

JULY 9, 2024

Principal Executive Officers and Management Persons

David Joel Hardin II

- Year of birth: 1980

Item 2 Educational Background and Business Experience:

Educational Background:

- College for Financial Planning; APMA®; 2017

David Joel Hardin II has earned certifications and credentials that are required to be explained in further detail.

Accredited Portfolio Management AdvisorSM (APMA®): Accredited Portfolio Management Advisor is a designation granted by the college for Financial Planning. Individuals who hold the APMA® designation have completed a course of study encompassing Client assessment and suitability, risk/return, investment objectives, bond and equity portfolios, modern portfolio theory and investor psychology. Students have hands-on practice in analyzing investment policy statements, building portfolios, and making asset allocation decisions including sell, hold, and buy decisions within a Client's portfolio. Additionally, individuals must pass an end-of-course examination that tests the ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process.

Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

National Social Security Advisor Certificate Holder: Certification is awarded by National Social Security Association, LLC, candidates must:

- Complete an eight-hour educational course from an authorized educational provider encompassing social security benefits and options.
- Pass an exam administered by The National Underwriter Company. Minimum test score 75%.
- Renew certification bi-annually. Sixteen hours of continuing education is required for renewal.

Business Experience:

- Einsteinian AI LLC; Member; 06-2024 - Present
- City Center Advisors, LLC formerly Keystone Financial Partners, Inc.; Member/Investment Advisor Representative; 12/2018 – Present
- City Center Financial, LLC; Senior Partner/Insurance Agent; 01/2016 – Present
- CoreCap Advisors, Inc.; Investment Advisor Representative; 04/2016 – 12/2018
- Hardin Financial Group; Vice President; 07/2015 – 12/2015
- VFG Associates; Life/Annuity Agent; 02/2014 – 06/2015
- Farm Fresh Products; Account Manager; 01/2013 – 01/2014

Item 3 Disciplinary Information

A. Mr. Hardin has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

1. Was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false

- statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
 2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
 3. Was found to have been involved in a violation of an investment-related statute or regulation; or
 4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Mr. Hardin never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
 2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority
 - (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Mr. Hardin has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or
 2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.

Item 4 Other Business Activities Engaged In

David Joel Hardin II has a financial industry affiliated business as a licensed insurance agent with City Center Financial, LLC. More than 50% of his time is spent in his insurance practice. From time to time, he will offer clients advice or products from those activities. Mr. Hardin receives commissions from insurance companies on the products sold.

These practices represent conflicts of interest because they give an incentive to recommend products/services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures, and Mr. Hardin's fiduciary obligation to act in the best interest of his clients and will act in accordance with those responsibilities. Clients have the right to purchase these products/services through another insurance agent of their choosing.

Additionally, Mr. Hardin is a Member of a digital marketing service, Einsteinian AI LLC. He spends less than 1% of his time on this activity and it does not create a conflict of interest because there will be no crossover clients.

Item 5 Additional Compensation

Mr. Hardin receives additional compensation in his capacity as an insurance agent and his time with Einsteinian AI LLC, but he does not receive any performance-based fees.

Item 6 Supervision

As Chief Compliance Officer, Mr. Hardin is responsible for supervision and formulation and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in the firm's compliance manual. He can be reached at joel@citycenterfinancial.com or 888-267-1321.

ITEM 1 COVER page

SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

Frank Eugene Endris, ChFEBC, RFC®



Main Office Address:

888 W. Big Beaver Rd.
Suite 1220
Troy, MI 48084

Branch Office Address:

5446 N. Academy
Suite 205
Colorado Springs, CO 80918

Tel: 719-622-6290

Fax: 719-302-2289

frank@citycenterfinancial.com

This brochure supplement provides information about Frank E. Endris and supplements the City Center Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Frank E. Endris if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Frank E. Endris (CRD #2944732) is available on the SEC's website at www.adviserinfo.sec.gov.

JULY 9, 2024

Principal Executive Officers and Management Persons

Frank Eugene Endris

- Year of birth: 1969

Item 2 Educational Background and Business Experience:

Educational Background:

- Purdue University; B.S., Financial Planning and Counseling; 1991

Frank Eugene Endris has earned certifications and credentials that are required to be explained in further detail.

Chartered Federal Employee Benefits Consultant (ChFEBC) is issued by the Federal Seminars & ChFEBC, Inc. To earn the designation, a candidate must meet the following requirements:

- Education – Complete 16 modules self-study or a two-day classroom course
- Examination – Pass the two-hour exam (proctored, closed book);
- Experience –
 - Three years of financial services experience and State Insurance License
 - Hold one of the following: Series 6, Series 7, Series 24, Series 66, or
 - Be an Investment Advisor Representative, or
 - Hold one of the following: (including three years of financial services experience)
 - Chartered Financial Consultant (ChFC)
 - Chartered Life Underwriter (CLU)
 - Chartered Financial Analyst (CFA)
 - Certified Financial Planner (CFP)
 - Masters Degree in Business, Finance or Economics
 - Attorney's License (JD)
 - Certified Public Accountant (CPA)
- Continuing Education – Complete 10 hours continuing education every two years

Registered Financial Consultant (RFC®): Registered Financial Consultant is a designation from the International Association of Registered Financial Consultants. RFC® certification requirements:

- Undergraduate or graduate financial planning degree or have earned one of the following: AAMS®, AEP®, CFA®, CFP®, ChFC®, CLU®, CPA®, EA®, LUTC®, MS, MBA, JD, PhD, or completed equivalent, IARFC-approved college curriculum.
- Licensing requirements: if operating on a commission basis, must meet licensing requirements for securities and life and health insurance; if operating strictly as fee-only and not licensed, then must be registered as an investment advisor.
- Four years full-time experience as a financial planning practitioner.
- Educational requirements: completion of approved college curriculum in personal financial planning or IARFC self-study course.
- Examination Type: college curriculum must include an IARFC-approved examination process. IARFC self-study course; final certification exam.
- Forty hours of continuing education per year.

National Social Security Advisor Certificate Holder: Certification is awarded by National Social Security Association, LLC, candidates must:

- Complete an eight-hour educational course from an authorized educational provider encompassing social security benefits and options.

- Pass an exam administered by The National Underwriter Company. Minimum test score 75%.
- Renew certification bi-annually. Sixteen hours of continuing education is required for renewal.

Business Experience:

- City Center Advisors, LLC formerly Keystone Financial Partners, Inc.; Member/Investment Advisor Representative/CCO; 04/2015 – Present
- City Center Financial, Inc.; Insurance Agent; 12/2018 – Present
- Frank Endris; Sole proprietor, Insurance Agent; 05/2013 – 12/2018
- Aspen Creek Wealth Strategies; Agent/VP; 09/2014 – 10/2017
- Federal Financial Group; Agent/District Manager; 05/2013 – 09/2014
- Securian Financial Services, Inc.; Registered Representative; 10/2012 – 04/2013
- Endris Nursery and Greenhouse; Founder/Owner; 06/1998 – 12/2012
- Endris Lynch Transport; Owner; 12/2006 – 12/2011

Item 3 Disciplinary Information

- A. Mr. Endris has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:
1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
 2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
 3. Was found to have been involved in a violation of an investment-related statute or regulation; or
 4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Mr. Endris never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
 2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Mr. Endris has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or

2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.

Item 4 Other Business Activities Engaged In

President Frank Endris has a financial industry affiliated business as a licensed insurance agent as a sole proprietor. More than 50% of his time is spent in his insurance practice. From time to time, he will offer clients advice or products from those activities. Mr. Endris receives commissions from insurance companies on the products sold.

These practices represent conflicts of interest because they give an incentive to recommend products/services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures, and Mr. Endris' fiduciary obligation to act in the best interest of his clients and will act in accordance with those responsibilities. Clients have the right to purchase these products/services through another insurance agent of their choosing.

Item 5 Additional Compensation

Mr. Endris receives additional compensation in his capacity as an insurance agent, but he does not receive any performance-based fees. Mr. Endris also receives fees from third party money managers as disclosed in the brochure above under Item 10.

Item 6 Supervision

Mr. Endris is supervised by David Joel Hardin II, the Chief Compliance Officer of City Center Advisors, LLC. He reviews Mr. Endris' work through phone interactions as well as office visits.

He can be reached at joel@citycenterfinancial.com or 888-267-1321.

ITEM 1 COVER PAGE

SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

David Joel Hardin, RFC®



Main Office Address:
888 W. Big Beaver Rd.
Suite 1220
Troy, MI 48084

Tel: 888-267-1321
Fax: 800-876-5210

dave@citycenterfinancial.com

This brochure supplement provides information about David Joel Hardin and supplements the City Center Advisors, LLC brochure. You should have received a copy of that brochure. Please contact David Joel Hardin if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about David Joel Hardin (CRD #725885) is available on the SEC's website at www.adviserinfo.sec.gov.

OCTOBER 14, 2024

Principal Executive Officers and Management Persons

David Joel Hardin

- Year of birth: 1956

Item 2 Educational Background and Business Experience:

Educational Background:

- Attended Prince George's College; 1974-1976

David Joel Hardin has earned certifications and credentials that are required to be explained in further detail.

National Social Security Advisor Certificate Holder: Certification is awarded by National Social Security Association, LLC, candidates must:

- Complete an eight-hour educational course from an authorized educational provider encompassing social security benefits and options.
- Pass an exam administered by The National Underwriter Company. Minimum test score 75%.
- Renew certification bi-annually. Sixteen hours of continuing education is required for renewal.

Registered Financial Consultant (RFC®): Registered Financial Consultant is a designation from the International Association of Registered Financial Consultants. RFC® certification requirements:

- Undergraduate or graduate financial planning degree or have earned one of the following: AAMS®, AEP®, CFA®, CFP®, ChFC®, CLU®, CPA®, EA®, LUTC®, MS, MBA, JD, PhD, or completed equivalent, IARFC-approved college curriculum.
- Licensing requirements: if operating on a commission basis, must meet licensing requirements for securities and life and health insurance; if operating strictly as fee-only and not licensed, then must be registered as an investment advisor.
- Four years full-time experience as a financial planning practitioner.
- Educational requirements: completion of approved college curriculum in personal financial planning or IARFC self-study course.
- Examination Type: college curriculum must include an IARFC-approved examination process. IARFC self-study course; final certification exam.
- Forty hours of continuing education per year.

Business Experience:

- Einsteinian AI LLC; Member; 06/2024 - Present
- City Center Advisors, LLC; Investment Advisor Representative; 06/2020 – Present
- City Center Advisors, LLC formerly Keystone Financial Partners, Inc.; Member; 12/2018 – Present
- City Center Financial, LLC; Co-Owner/Insurance Agent; 01/2016 – Present
- Hardin Financial Group; Owner; 05/2015 – 01/2016
- M and O Marketing; Vice President; 09/2011 – 05/2015
- Hardin Enterprises; Owner; 05/2010 – 09/2011

Item 3 Disciplinary Information

- A. Mr. Hardin has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:
1. Was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
 2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
 3. Was found to have been involved in a violation of an investment-related statute or regulation; or
 4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Mr. Hardin never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
 2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Mr. Hardin has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or
 2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.

Item 4 Other Business Activities Engaged In

Dave Hardin has a financial industry affiliated business as a licensed insurance agent with City Center Financial, LLC. More than 50% of his time is spent in his insurance practice. From time to time, he will offer clients advice or products from those activities. Dave Hardin receives commissions from insurance companies on the products sold.

These practices represent conflicts of interest because they give an incentive to recommend products/services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures, and Dave Hardin's fiduciary obligation to act in the best interest of his clients and will act in accordance with those responsibilities. Clients have the right to purchase these products/services through another insurance agent of their choosing.

Additionally, Mr. Hardin is a Member of a digital marketing service, Einsteinian AI LLC. He spends less than 1% of his time on this activity and it does not create a conflict of interest because there will be no crossover clients.

Item 5 Additional Compensation

Dave Hardin receives additional compensation in his capacity as an insurance agent and his time with Einsteinian AI LLC, but he does not receive any performance-based fees.

Item 6 Supervision

Dave Hardin is supervised by David Joel Hardin II, the Chief Compliance Officer of City Center Advisors, LLC. He reviews Dave Hardin's work through phone interactions as well as office visits. He can be reached at joel@citycenterfinancial.com or 888-267-1321.