

## Part 2A of Form ADV: Firm Brochure

### **Kirtland Hills Capital Management, LLC**

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BRATENAHL, OH 44108

440.477.8913

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

January 31, 2024

This brochure provides information about the qualifications and business practices of Kirtland Hills Capital Management, LLC (referred to in this Brochure as “KHCM, LLC” or the “Firm”). If you have any questions about the contents of this brochure, **please contact James Paul Luthardt, Chief Executive Officer and Chief Compliance Officer by phone (440.477.8913) or email (JAMES@KIRTLANDHILLSCAPITAL.COM)**. 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.

Kirtland Hills Capital Management, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Kirtland Hills Capital Management, LLC is also available on the SEC’s website ([www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)).

NOTE: The SEC and various state securities regulators have adopted coordinated requirements for the form of disclosure brochures to be provided to clients of a registered investment adviser.

## ***Item 2 – Material Changes***

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Generally, Kirtland Hills Capital Management, LLC will notify clients of material changes on an annual basis. However, where we determine that an interim notification is either meaningful or required, we will notify our clients promptly. In either case, we will notify our clients in a separate document.

This Brochure, dated January 31, 2024 replaces the previous firm Brochure dated March 15, 2023

### **Annual Update**

This Brochure, dated January 31, 2024, is the annual amendment. The firm's last annual Brochure was dated March 15, 2023. Since the last annual Brochure the following material changes occurred:

- Cover Page: The firm phone number is now 440.477.8913.
- Item 4 – Assets Under Management has been updated as of December 31, 2023.

There were no other Material Changes since March 15, 2023.

### **Full Brochure Availability**

KHCM, LLC can provide a copy of the current brochure at no charge. Please call 440.477.8913 or contact the Firm via email [JAMES@KIRTLANDHILLSCAPITAL.COM](mailto:JAMES@KIRTLANDHILLSCAPITAL.COM). Additional information about Kirtland Hills Capital Management, LLC is also available on the SEC's website ([www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)).

In 2024, all new clients are being provided a full copy of our brochure.

## ***Item 3 - Table of Contents***

Item 1 - Cover Page.....	1
Item 2 - Material Changes.....	2
Item 3 – Table of Contents.....	3
Item 4 – Advisory Business.....	5
Item 5 – Fees and Compensation.....	6
Item 6 – Performance Based Fees and Side-By-Side Management.....	7
Item 7 – Types of Clients.....	7
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	7
Item 9 – Disciplinary Information.....	8
Item 10 - Other Financial Industry Activities and Affiliations.....	8
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	9
Item 12 - Brokerage Practices.....	9
Item 13 – Review of Accounts.....	10
Item 14 - Client Referrals and Other Compensation.....	10
Item 15 – Custody.....	10
Item 16 – Investment Discretion.....	11
Item 17 – Voting Client Securities.....	11
Item 18 – Financial Information.....	11
Item 19 – Requirements for State Registered Advisors.....	12
Business Continuity and Disaster Recovery Plan.....	12

***Item 3 – Table of Contents (continued)***

**Part 2B of form ADV – Brochure Supplement – James Luthardt**

<b>Item 1 – Cover Page Part 2B of form ADV – Brochure Supplement.....</b>	<b>14</b>
<b>Item 2 – Educational Background and Business Experience.....</b>	<b>15</b>
<b>Item 3 – Disciplinary Information.....</b>	<b>15</b>
<b>Item 4 – Other Business Activities.....</b>	<b>16</b>
<b>Item 5 – Additional Compensation.....</b>	<b>16</b>
<b>Item 6 – Supervision.....</b>	<b>16</b>
<b>Item 7 – Requirements for State Registered Advisors .....</b>	<b>16</b>

## ***Item 4 - Advisory Business***

Kirtland Hills Capital Management is a limited liability company owned by James Paul Luthardt. KHCM, LLC is a Registered Investment Adviser in the State of Ohio under firm CRD number 174335.

Kirtland Hills Capital Management has been in the business of providing Investment Advisory Services primarily to individuals, high net worth individuals, families and small businesses since January 2015. Client financial goals and objectives are reviewed through meetings and discussions, as well as time horizon, investment experience, tolerance for risk and other related specific financial circumstances that are relevant to the client's financial objectives. Customized asset allocations are then developed and presented to the client.

KHCM, LLC's Investment Advisory Services include, but are not limited to:

- Risk Tolerance Assessment
- Investment Strategy Planning
- Asset Selection
- Asset Allocation
- Portfolio Monitoring

KHCM, LLC specializes in building LONG-TERM investment portfolios in equity securities, exchange listed securities, over the counter and foreign securities, and exchange traded funds, municipal securities and U.S. Government securities for our client accounts. We are not short-term traders and view building positions in equities from an "owners perspective" to build compounding, multi-generational wealth. Both quantitative and qualitative analysis are used in choosing an investment for a client's portfolio, but technical factors help shape the Firm's overall investment perspective. The Firm uses third-party research, company prospectuses, SEC filings, annual reports and other public information related to the client's specific asset allocation model, risk tolerance and investment objectives. If a client is unsure of a particular type of security or is opposed to certain securities and imposes restrictions on those securities with KHCM, LLC, the client should provide these restrictions to KHCM, LLC in writing.

KHCM, LLC does not "hold itself out" as specializing in any discipline other than Investment Advisory Services. The Firm will not provide tax advice or estate planning services. It may recommend other professionals to our clients if the need arises. When KHCM, LLC, for example, refers a client to an accountant for complex investment account tax purposes or an estate attorney for complex estate or trust issues, KHCM, LLC is not compensated in any way. Kirtland Hills Capital Management is only compensated by fees paid by clients for the percentage of assets under management. No commissions are accepted for any financial product.

# Kirtland Hills Capital Management | LLC

KHCM, LLC may serve as a subadvisor to other investment advisers. If KHCM, LLC acts as a subadvisor, it will enter into an investment sub-advisory agreement with the primary adviser (a "Sub-advisory Agreement") in lieu of entering into an investment advisory agreement with each client. KHCM, LLC will contractually require the primary adviser to:

- Provide KHCM, LLC accurate and current information with respect to the financial profile and investment objectives and restrictions, if any, of each sub-advisory client;
- Provide this Brochure to each sub-advisory client; and
- Not make any representations to sub-advisory clients about KHCM, LLC or its relationship to the primary adviser that is not reflected in this Brochure or the Sub-advisory Agreement.

In its role as a subadvisor, KHCM, LLC will provide advice only with respect to the securities, cash, and other investments held in client accounts and, in making recommendations for client accounts, KHCM, LLC will not consider any other securities, cash or other investments owned by clients.

Before entering into a sub-advisory Agreement, KHCM, LLC will conduct a reasonable investigation to determine that the primary adviser is registered with either the SEC or an appropriate state securities regulator and that the services to be provided by KHCM, LLC are compatible with the disclosures made to sub-advisory clients by the primary adviser.

KHMC may select other registered investment advisers to provide financial planning, estate planning and tax planning services through a sub-advisor arrangement. This arrangement will be contained in the sub-advisor addendum of the Investment Advisory Agreement and will include the fee arrangement for the sub-advisor.

KHCM, LLC does not accept custody of client funds or securities. We work through independent custodians such as Schwab Advisor Services ("Schwab"). All client managed accounts will be managed on a discretionary basis. Kirtland Hills Capital Management does not provide any "wrap fee" or "soft dollar" programs to our clients. We offer no products of our own, and have no ownership interest in any investments we recommend to our clients. However, we may trade in the same securities for ourselves that we recommend to our clients.

As of December 31, 2023, KHCM, LLC has approximately \$152,200,000 in discretionary assets under management.

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

### **Investment Management Fees**

### **Annual Fee (Flat Fee Rate)**

1.2% (subject to negotiation in certain circumstances)

Kirtland Hills Capital Management, LLC is compensated on a percentage of client assets under management. A schedule of the Firm's general management fees is set out above, but different management fees may be negotiated in certain circumstances, and the fee schedule included in the client's Investment Advisory Agreement will govern. Client accounts are managed on a discretionary basis with fees calculated and deducted from client accounts monthly in arrears. The assets under management at the end of each calendar month will be multiplied by the applicable annual rate for that client, and the result will be divided by twelve. If an account is initiated other than on the first day of a month, the fee for the partial month will be prorated on a daily basis and calculated as of the end of the partial month. Additionally, clients may terminate their contracts with two weeks written notice without penalty. If an account is terminated other than at the end of a month, the advisory fee for the partial month will be prorated on a daily basis. All advisory fees are withdrawn directly from the client's account with written authority.

KHCM, LLC fees are exclusive of brokerage commissions, transaction fees and other related expenses that are to be paid by the client. See "Item 12—Brokerage Practices." Clients may also incur charges from custodians, brokers and third parties such as, wire transfer fees, electronic fund transfer fees and taxes on brokerage accounts. Exchange traded funds and mutual funds also charge management fees which are disclosed in the fund's prospectus. These fees and charges are exclusive of and in addition to KHCM, LLC fees. Kirtland Hills Capital Management, LLC accepts no commissions for any financial product sale. KHCM, LLC is only compensated by fees paid to the Firm by the client, generally by deduction from the client's account.

## ***Item 6 – Performance Based Fees***

Kirtland Hills Capital Management, LLC does not charge any performance-based fees.

## ***Item 7 – Types of Clients***

Kirtland Hills Capital Management, LLC provides Investment Advisory Services primarily to individuals, high net worth individuals, families and small businesses. There is no specific minimum account size required by KHCM, LLC, but the Firm may decline to accept an account for any reason, including the size of the account.

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

Kirtland Hills Capital Management, LLC uses both fundamental and technical analysis when evaluating client portfolio options. Fundamental analysis measures the intrinsic value of a security by analyzing economic and financial factors (such as the economy, industry conditions, financial status and management of a company). We then determine if a company is appropriately valued. Fundamental analysis does not attempt to anticipate short-term market movements. This presents a potential risk, as the price of a security can move up or down

following the overall market regardless of the economic and financial factors considered in evaluating the security.

Technical analysis analyzes past market movements and applies the analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement. Technical analysis does not consider the underlying financial condition of a company. Regardless of market movement, this presents a risk in that a poorly-managed or financially unsound company may underperform relative to the stock market in general.

We also utilize third party research, company prospectuses, annual reports and other public information related to the client's specific asset allocation model, risk tolerance and investment objectives, to choose the most suitable investment portfolio for the client. Most of our investment recommendations will generally be long-term, a year or more, but it should be noted that at times securities may be traded on a short-term basis (less than a year due to specific circumstances). Our overall portfolio management methodology emphasizes asset class diversification with weighted asset classes based on client goals and objectives. The Firm does not attempt to manage client accounts based on any specific tax consequences. If a client has specific tax considerations relevant to the portfolio, the client should advise KHCM, LLC in writing, and KHCM, LLC may or may not be able to accommodate those considerations.

It should also be noted that if Kirtland Hills Capital Management does not manage all of a client's investment assets, KHCM, LLC will not be able to coordinate the Firm's investment advice with the client's other investments, and as a result the allocations by asset class and by specific securities for their total holdings may not be ideal.

KHCM, LLC analyzes stocks, both domestic and foreign, as well as bonds, preferred stocks and exchange traded funds for client portfolios. All investments are subject to risk of financial loss that clients must be prepared to bear. Portfolio diversification can alleviate some risk but non-diversifiable risk cannot be prevented. These unavoidable risks include war, acts of terrorism, political risk, inflation and others that investors must be prepared to accept. Additionally, past performance is no guarantee of future results.

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

There have been no disciplinary or legal proceedings filed against KHCM, LLC.

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

Kirtland Hills Capital Management, LLC is not involved in any other financial industry activities or affiliations. Mr. Luthardt, the chief executive officer and chief investment officer of KHCM, LLC.



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

KHCM, LLC has adopted a Code of Ethics that focuses on a high standard of business conduct and fiduciary duty to the Firm's clients. The Code of Ethics includes provisions relating but not limited to: Confidentiality of client Information, Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions and Prohibited Activities, among other things. A copy of our Code of Ethics may be obtained by contacting James Paul Luthardt by phone (440.477.8913) or email [JAMES@KIRTLANDHILLSCAPITAL.COM](mailto:JAMES@KIRTLANDHILLSCAPITAL.COM).

At times, a principal or representative of KHCM, LLC may buy or sell stocks that are also recommended to clients. This gives rise to a conflict of interest, as fluctuations in the market price of the same or similar securities could result in the principal or representative of KHCM, LLC receiving a financial benefit or advantage as compared to the Firm's clients. In order to protect clients from this potential conflict of interest, KHCM, LLC and its personnel will always buy or sell client securities prior to their own transactions when the same or similar securities are purchased or sold.

***Item 12 – Brokerage Practices***

KHCM, LLC utilizes Schwab Advisor Services RIA Platform for custodial services and trading of client accounts. KHCM, LLC maintains a limited trading authorization over each client account with respect to securities to be bought or sold and the amount of securities being bought or sold. Schwab Advisor Services is recommended for custodial services for clients due to their reasonable transaction fees, execution, capabilities, and suitability to client needs. Monthly statements and trade confirmations are sent directly to the client by Schwab. KHCM, LLC does not receive any commissions or trading fees from Schwab Advisor Services for client referrals. Additionally, Kirtland Hills Capital Management, LLC does not receive soft dollar benefits from Schwab Advisor Services or any broker/dealers or custodians we recommended to clients.

KHCM, LLC's primary objective for selecting broker/dealers is to obtain best execution for our clients. This includes the broker/dealer's reliability, integrity, financial stability and the market of the security. With these factors taken into consideration, this may not result in the lowest possible client commissions; however, KHCM, LLC will always attempt to obtain the highest level of service at the best net cost for our client's transactions.

The limited trading authorization given by each client authorizes Schwab Advisor Services to act on instructions from the Firm to aggregate transaction orders for each client's account with transaction orders for other clients' accounts, and the aggregated order may be executed in more than one transaction. A client's portion of such order may be deemed to have been at the weighted average of the prices at which all of such transactions were executed. KHCM, LLC intends to aggregate orders for multiple clients when a particular stock or ETF is purchased for multiple clients on the same day.

Not all advisers require that their clients use a particular broker-dealer for custody and trade execution. KHCM, LLC believes that custody and trading through Schwab Advisor Services will result in the best overall outcome for the clients of the Firm, but this cannot be assured. Requiring clients to use a particular broker-dealer may result in the Firm being unable to achieve most favorable execution of client transactions, and this practice may cost clients more money.

### ***Item 13 – Review of Accounts***

Accounts are monitored continuously by Mr. Luthardt, the chief executive officer and chief investment officer of the firm, on a general basis, and are reviewed in more detail on a monthly basis with attention to asset class weighting, material changes to stocks in the portfolio or political or regulatory changes to parts of the portfolio that may need to be reassessed. Accounts may be reviewed more frequently due to changes in the client's goals and objectives or due to a change in market conditions. The frequency of client reviews is discussed with each client at the inception of the relationship and is individually tailored.

Clients receive monthly statements from the custodian. These statements detail the account holdings and transaction activity for the period. Clients should review those statements promptly and carefully. If a client believes an account statement contains an error or if the client fails to receive an account statement when expected, the client should contact the custodian and also inform KHCM, LLC. Mr. Luthardt discusses performance results, gains and loss information and balances and holdings information with each client on an annual basis. Written reports are not routinely provided to clients. However, special reports may be developed to meet specific client requirements if requested.

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

#### **Economic Benefits**

Kirtland Hills Capital Management, LLC does not receive any compensation other than the compensation discussed in Item 5. There currently are no other arrangements, oral or in writing where it directly or indirectly receives compensation for client referrals.

#### **Third Party Solicitors**

Kirtland Hills Capital Management, LLC will use, and compensate a non-employee (outside) (Solicitor) for client referrals. If your investment advisor relationship is obtained through a Solicitor, you will receive a Solicitor Disclosure Form that will describe the solicitor relationship and the compensation earned by the Solicitor. Your fee will not increase because of the Solicitor relationship. This form will require you to sign the form acknowledging this relationship.

Beyond the disclosures provided in this Brochure, we do not receive any compensation from any third party in connection with providing investment advice to you.

### ***Item 15 – Custody***

Kirtland Hills Capital Management, LLC does not take direct custody of any client funds or securities. KHC does have limited custody for the ability to deduct investment advisory fees directly from the Account, Adviser does not maintain custody of client funds or securities, nor is it authorized to hold or receive any stock, bond, or other security or investment certificate or cash (except in the payment of its investment advisory fee) that is part of the Account. Custody of Account assets will be maintained with the independent custodian selected by Client and which meets the definition of Qualified Custodian in applicable rules. Until Client and Adviser agree otherwise, the custodian will be Schwab Advisor Services. The Client will be solely responsible for paying all fees or charges of the custodian. Client shall provide, or shall instruct the custodian to provide, Adviser with such reports as to the status of the Account as Adviser reasonably requests. Adviser shall have no liability with respect to custodian arrangements or the acts, conduct or omissions of the custodian. Clients receive a monthly statement showing all fees and should carefully review statements from custodian.

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

Kirtland Hills Capital Management, LLC requires discretionary authority for all client accounts managed by it. This discretion is exercised under a Limited Trading Authorization Agreement entered into at the outset of the client advisory relationship. This discretion will be exercised in a manner that is consistent with the investment goals and objectives of the client. Any client investment restrictions, such as restrictions on certain securities, certain types of securities, or certain industries, should be provided to KHCM, LLC in writing. KHCM, LLC may declare to accept a client if KHCM, LLC believes such client's restrictions are not acceptable.

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

Kirtland Hills Capital Management, LLC will not and does not vote proxies on behalf of advisory clients unless required by law. All proxy material will be sent directly to the client by the custodian. KHCM, LLC may provide advice if requested, but generally, clients are encouraged to review proxy material and vote their own shares. The Firm does not charge additional fees for any proxy voting advice that a client may request.

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

Additional financial information is required of Advisors that collect fees in advance of services performed. Kirtland Hills Capital Management, LLC does not solicit the prepayment of fees. KHCM, LLC does not have any financial condition that is reasonably likely to impair its ability to

meet its contractual commitments to clients. Additionally, KHCM, LLC has never been the subject of a bankruptcy proceeding.

## **Item 19 – Requirements for State-Registered Advisers**

Information required by this item appears in Part 2B below.

### **Business Continuity and Disaster Recovery Plan**

Kirtland Hills Capital Management has developed a Business Continuity Plan and Disaster Recovery Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

**Contacting Us** – If after a significant business disruption you cannot contact us as you usually do by phone (440.477.8913) or email [JAMES@KIRTLANDHILLSCAPITAL.COM](mailto:JAMES@KIRTLANDHILLSCAPITAL.COM) you should contact Schwab Advisor Services by phone (800.515.2157) or secure message through your account on the Schwab website ([www.schwaballiance.com](http://www.schwaballiance.com)).

**Our Business Continuity Plan** – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm’s books and records, and allowing our clients to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with clients, employees, and regulators, alternate physical location of employees, critical suppliers, banks, regulatory reporting, and assuring our clients prompt access to their funds and securities if we are unable to continue our business.

**Varying Disruptions** – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the neighborhood where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only KHCM, LLC or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 24 hours. In a disruption affecting our neighborhood, city, or region, we will, to the extent practical, transfer our operations to a site outside of the affected area, and recover and resume business within five days. In either situation, we plan to continue in business, transfer operations to our custodian broker-dealer if necessary, and notify you by phone, fax, email, or instant message on the best way to contact KHCM, LLC. If at any

given time there is only one Investment Adviser Representative at KHCM, LLC and that representative dies or becomes unable for a period in excess of [10] business days to conduct the business of KHCM, LLC (either a “Disability Event”), then upon such Disability Event (a) KHCM, LLC will use its best efforts to notify all custodians of client accounts to that effect and cause the custodians to notify the respective clients, (b) all investment advisory agreements between KHCM, LLC and clients will terminate upon the occurrence of the Disability Event, and (3) each client will have full access to direct the custodian with respect to the disposition of the account. Because the disabled representative will not be able to provide such notices, KHCM, LLC will make arrangements with a third party who is likely to be aware of the disability event and will be instructed to notify the custodian and to instruct the custodian to notify clients.

**For more information** –If you have questions about our business continuity planning or would like a copy of the plan, you can contact James Paul Luthardt by phone (440.477.8913) or by email [JAMES@KIRTLANDHILLSCAPITAL.COM](mailto:JAMES@KIRTLANDHILLSCAPITAL.COM).

## **Part 2B of Form ADV: Brochure Supplement**

**James Paul Luthardt, CRD#: 5743782**

Investment Adviser Representative

**Kirtland Hills Capital Management, LLC**

1 Bratenahl Place, Suite 1201

Bratenahl, OH 44108

Telephone Number: 440.477.8913

E-Mail: JAMES@KIRTLANDHILLSCAPITAL.COM

### **Item 1 – Cover Page**

This brochure supplement provides information about James Paul Luthardt that supplements the Kirtland Hills Capital Management brochure. If you did not receive a copy of that brochure or if you have any questions about the contents of this supplement, please contact us by phone (440.477.8913) or email [JAMES@KIRTLANDHILLSCAPITAL.COM](mailto:JAMES@KIRTLANDHILLSCAPITAL.COM). Additional information about James Paul Luthardt is available on the SEC's website ([www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)).

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.

Blue Tree Wealth Advisors LLC. is a Registered Investment Adviser. Registration as a "Registered Investment Adviser" does not imply a certain level of skill or training.

January 31, 2024

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

**James Paul Luthardt, CEO/CIO; Kirtland Hills Capital Management**

Born: 1985

### ***Education:***

**Case Western Reserve University, Cleveland OH - 2014**

*Master in Finance*

**University of Toledo, Toledo, OH – 2009**

*Bachelor of Science in Finance*

### ***Business Background:***

United States Navy; Naval Officer, 2016 – Present

Kirtland Hills Capital Management; CEO/CIO, 2015 – Present

Headwaters Investment Counsel; Director of Research; Senior Investment Analyst, 2017 - 2019

Janney Montgomery Scott; Private Client Group, 2009 – 2014

### ***Description of Professional Designations:***

Mr. Luthardt has no professional designations.

## **Item 3 - Disciplinary Information**

### **Legal or Disciplinary Events**

No information is applicable for this item for Mr. Luthardt.

### **Criminal or Civil Action**

There is no material information that is applicable for this item for Mr. Luthardt.

### **Administrative Proceeding**

No information is applicable for this item for Mr. Luthardt.

### **Self-Regulatory Organization Proceeding**

No information is applicable for this item for Mr. Luthardt.

### **Other Proceeding**

No information is applicable for this item for Mr. Luthardt.

## **Item 4 – Other Business Activities**

### **Investment-Related Activities**

James Paul Luthardt is not actively engaged in any other business or occupation (investment-related) beyond his capacity as a Registered Investment Adviser Representative of Kirtland Hills Capital Management, LLC.

### **Other Business or Occupation for Compensation**

James Paul Luthardt is a Naval Officer in the United States Navy.

## **Item 5 – Additional Compensation**

### **Economic Benefit**

Mr. Luthardt receives no additional compensation from any sources for providing investment advice.

## **Item 6 – Supervision**

### **Describe Supervision**

Mr. Luthardt is the CEO/CIO for Kirtland Hills Capital Management, LLC. As such, there are no higher-level persons with supervisory power over Mr. Luthardt's advice. With that said, he is responsible for conducting himself in accordance with all regulatory requirements, including those applicable to client communication, suitability, trading and fiduciary responsibilities relating to client's risk tolerance and financial goals and objectives.

### **Name, Title and Telephone Number of Supervisor**

Not Applicable for Mr. Luthardt.

## **Item 7 – Requirements for State Registered Advisers**

### **Additional Information Regarding Disciplinary Events**

There are no additional material facts to disclose regarding disciplinary events for Mr. Luthardt.

### **Bankruptcy**

Mr. Luthardt has never been in, or the subject of, a bankruptcy.



## **Part 2B of Form ADV: Brochure Supplement**

**Zachary Joseph Paul, CRD#: 7284171**

Quantitative Research Analyst

**Kirtland Hills Capital Management, LLC**

1 Bratenahl Place, Suite 1201

Bratenahl, OH 44108

440.477.8913

### **Item 1 – Cover Page**

This brochure supplement provides information about Zachary Joseph Paul that supplements the Kirtland Hills Capital Management brochure. If you did not receive a copy of that brochure or if you have any questions about the contents of this supplement, please contact us by phone (440.477.8913) or email [JAMES@KIRTLANDHILLSCAPITAL.COM](mailto:JAMES@KIRTLANDHILLSCAPITAL.COM). Additional information about Zachary Joseph Paul is available on the SEC's website ([www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)).

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Kirtland Hills Capital Management, LLC is a Registered Investment Adviser. Registration as a "Registered Investment Adviser" does not imply a certain level of skill or training.

January 31, 2024

## Item 2 – Educational Background and Business Experience

**Zachary Joseph Paul, Quantitative Research Analyst; Kirtland Hills Capital Management**

Born: 1993

***Education:***

**University of Akron, Akron, OH - 2015**

*Bachelor of Engineering BE, Mechanical Engineering*

**Case Western Reserve University, Cleveland, OH - 2018**

*Master of Science in Management (MSM), Quantitative Finance - Big Data Analytics*

***Business Background: Experience:***

Kirtland Hills Capital Management; Quantitative Research Analyst, 2017 – Present

Hyland Software; Platform Data Engineer, 2021 - Present

Lovelytics; Senior Data Scientist, 2019 – 2021

Hendrickson; Mechanical Engineer, 2017

Paladin Attachments; Mechanical Engineer, 2015 - 2017

***Description of Professional Designations:***

Mr. Paul has no professional designations.

## Item 3 - Disciplinary Information

**Legal or Disciplinary Events**

No information is applicable for this item for Mr. Paul.

**Criminal or Civil Action**

There is no material information that is applicable for this item for Mr. Paul.

**Administrative Proceeding**

No information is applicable for this item for Mr. Paul.

**Self-Regulatory Organization Proceeding**

No information is applicable for this item for Mr. Paul.

**Other Proceeding**

No information is applicable for this item for Mr. Paul.

## **Item 4 – Other Business Activities**

### **Investment-Related Activities**

Zachary Joseph Paul is not actively engaged in any other business or occupation (investment-related) beyond his capacity as a Registered Investment Adviser Representative of Kirtland Hills Capital Management, LLC.

### **Other Business or Occupation for Compensation**

Zachary Joseph Paul is a Platform Data Engineer at Hyland Software.

## **Item 5 – Additional Compensation**

### **Economic Benefit**

Mr. Paul receives no additional compensation from any sources for providing investment advice.

## **Item 6 – Supervision**

### **Describe Supervision**

Zachary Paul is supervised by James Luthardt for Kirtland Hills Capital Management, LLC. Mr. Luthardt is responsible for supervision over Mr. Paul's advice. Mr. Luthardt is responsible for ensuring Mr. Paul is conducting himself in accordance with all regulatory requirements, including those applicable to client communication, suitability, trading and fiduciary responsibilities relating to client's risk tolerance and financial goals and objectives.

### **Name, Title and Telephone Number of Supervisor**

James Paul, Chief Executive Officer, 440.477.8913

## **Item 7 – Requirements for State Registered Advisers**

### **Additional Information Regarding Disciplinary Events**

There are no additional material facts to disclose regarding disciplinary events for Mr. Paul.

### **Bankruptcy**

Mr. Paul has never been in, or the subject of, a bankruptcy.