



**Form ADV Part 2A**

**Brochure Cover Page**

**Koss Olinger Consulting, LLC**

SEC File No. 801-58175

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Koss Olinger Consulting, LLC (referred to as "Adviser" or "Koss Olinger")  
is a registered\* investment advisory firm under the Investment Adviser's Act of 1940.

Dated 05-30-2018

This brochure provides information about the qualifications and business practices of  
Koss Olinger Consulting, LLC.

If you have any questions about the contents of this brochure, please  
contact [bobe@kossolinger.com](mailto:bobe@kossolinger.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.

Additional information about Koss Olinger Consulting, LLC  
is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

*\* Registration with the SEC does not in any way constitute an endorsement by the SEC of an investment adviser's skill or expertise. Further, registration does not imply or guarantee that a registered adviser has achieved a certain level of skill, competency, sophistication, expertise or training in providing advisory services to its clients.*

**ITEM 2 MATERIAL CHANGES FOR PART 2A**

*This brochure dated 05-30-2018 has been prepared according to SEC and state rules. In the future, this section will discuss specific material changes made, if any, and will provide you with a summary of any such material changes that have occurred since the last filing of this Brochure with the SEC and states.*

*There have been no material changes to this Brochure which was last updated and filed with the SEC on 03-22-2018.*

*Pursuant to State and SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year which is December 31<sup>st</sup>. We will provide other ongoing disclosure information about material changes as necessary. We will also provide you with a new Brochure, as necessary, based on changes or new information. Currently, our Brochure may be requested at any time, without charge, by contacting Robert Eberhard at (352) 373-3337 or via email at [bobe@kossolinger.com](mailto:bobe@kossolinger.com) or on the SEC's web site at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by using a unique identifying number, known as a Central Registration Depository, or CRD, number. The CRD number for Koss Olinger Consulting, LLC is 111855. The SEC's web site also provides information about any persons affiliated with Koss Olinger Consulting, LLC who are registered, or are required to be registered, as investment adviser representatives.*

**Table of Contents****TABLE OF CONTENTS****ADV Part 2A Brochure**

ITEM 1 Brochure Cover Page	1
ITEM 2 Changes for Part 2A	2
ITEM 3 Table of Contents	3
ITEM 4 Advisory Business	4
ITEM 5 Fees and Compensation	6
ITEM 6 Performance-Based Fees and Side by Side Management	9
ITEM 7 Types of Clients	9
ITEM 8 Methods of Analysis, Investment Strategies and Risk of Loss	9
ITEM 9 Disciplinary Information	10
ITEM 10 Other Financial Industry Activities and Affiliations	10
ITEM 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	11
ITEM 12 Brokerage Practices	12
ITEM 13 Review of Accounts	15
ITEM 14 Client Referrals and Other Compensation	15
ITEM 15 Custody	15
ITEM 16 Investment Discretion	15
ITEM 17 Voting Client Securities	16
ITEM 18 Financial Information	16
Privacy Policy	

**ADV Part 2B Supplemental**

William David Olinger, III	18
Kirk Edward Klein	22
William David Olinger, II	27
William Frederick Koss	32
William James Rossi, III	37
Brian Earl Watson	42
Timothy Alderson Roark	46
Shannon Louise Hord	50
Mitchell Hawkes Hay	53

## ITEM 4 ADVISORY BUSINESS

Koss Olinger Consulting, LLC (referred to as “Adviser” or “Koss Olinger”) is a registered\* investment advisory firm under the Investment Advisers Act of 1940.

*\* Registration with the SEC does not in any way constitute an endorsement by the SEC of an investment adviser’s skill or expertise. Further, registration does not imply or guarantee that a registered adviser has achieved a certain level of skill, competency, sophistication, expertise or training in providing advisory services to its clients.*

Koss Olinger Financial Group was established in 1969 as a privately owned, independent financial planning company to provide personal and professional wealth management services to individuals, families and businesses. In 2009, Koss Olinger Financial Group became two separate entities - Koss Olinger and Company, LLC and Koss Olinger Consulting, LLC. In September 2009, Koss Olinger Consulting, LLC was organized as a Limited Liability Company under the laws of the State of Florida. In September 2016, William D. Olinger III, Kirk E. Klein, William J. Rossi III and Brian E. Watson purchased 36% in member units (9% each) from founding members, William D. Olinger II (18%) and William F. Koss (18%). The resulting ownership percentages of both entities are William D. Olinger III (29%), Kirk E. Klein (29%), William J. Rossi III (21%) and Brian E. Watson (21%). William D. Olinger II and William F. Koss will remain involved as consultants. Together these six individuals have over 150 years of financial advisory experience.

The Advisory services that Koss Olinger offers includes management of investment advisory accounts, investment supervisory services, investment advice through consultations, financial planning, and often, furnishing advice to clients on matters not involving securities. Koss Olinger’s investment advisory services are offered as a percentage of assets under management and fixed fees (not including subscription fees). Koss Olinger’s client base includes individuals, pension and profit sharing plans, trusts, estates, charitable organizations, and corporations or other business entities. Koss Olinger offers a range of investment advice on various types of investments including equity securities (exchange-listed securities and securities traded over-the-counter), certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual fund shares), United States government issued securities, and options contracts on securities. Koss Olinger also offers investment advice on interests in partnerships in real estate, oil and gas interests, real estate investment trusts (REITS), and possibly CMOs (collateralized mortgage options).

The Department of Labor’s Fiduciary Rule became fully implemented on January 1, 2018. This rule is designed to protect investors by requiring that all financial services professionals who provide retirement advice abide by a fiduciary standard. This means that we are required to make prudent investment recommendations without regard to our own interests or those interests of anyone other than the client. Koss Olinger has always recognized this fiduciary relationship with our clients throughout all our advisory services and we will continue to do so. Koss Olinger will continue to monitor this ruling and keep our clients informed of any changes.

The investment strategies used to implement any investment advice given to clients include long term purchases (securities held at least a year), short term purchases, trading (securities sold within 30 days), short sales, margin transactions, and option writing (including covered options, uncovered options or spreading strategies).

Koss Olinger provides a client-centered planning process that allows the Adviser to tailor the advisory services to the individual needs of the clients. The process takes clients through The Wealth Navigator System™.

### The Wealth Navigator System™

#### Engagement and Discovery™

The first step of the planning process is Engagement and Discovery™. The Adviser gathers as much pertinent information as possible through client meetings, questionnaires, etc. allowing the Adviser to create a financial game plan that is unique to the client. The Adviser discusses the client’s current financial situation, their goals, objectives and available resources.

**ITEM 4 ADVISORY BUSINESS (CONTINUED)****The Critical Factors Analysis™**

The second step of the planning process is The Critical Factors Analysis™. Using the information from the discovery process, the Adviser analyzes the client's current financial strengths and weaknesses, as well as the financial opportunities available to the client. This step involves combining the client's personal information and the Adviser's wisdom, experience, and creativity to allow the Adviser to create and develop a financial game plan that is unique to the client.

**The Breakthrough Game Plan™**

The Breakthrough Game Plan™ is the next step in the planning process. The Breakthrough Game Plan is a comprehensive strategy customized for the client that may include retirement planning, estate planning, tax planning, business planning, risk management and asset management. The Adviser educates the client on the various options available in the marketplace that may be needed to implement the client's game plan. The Adviser explains the client's options in an objective, unbiased manner and the Adviser provides their recommendations.

Utilizing The Legacy Optimizer™ ("LO™"), The Secure Retirement Maximizer™ ("SRM™") and The Optimized Portfolio Solution™ ("TOPS™") as tools, the Adviser can identify, evaluate, analyze and develop a customized financial plan.

**The Implementation Solution™**

Once the client is presented The Breakthrough Game Plan™, the Adviser will guide the client through the strategies they want to implement based on the client's unique financial situation, goals and available resources. The Adviser will execute the client's game plan at the request of the client.

**The Wealth Manager™**

Koss Olinger will provide ongoing advice and management of the client's Breakthrough Game Plan™. The Adviser will provide proactive, objective advice to ensure the client's goals are successfully accomplished should the client's situation, goals or objectives change.

Koss Olinger provides continuous and regular supervisory or management services to securities portfolios. The assets we have under management and number of accounts associated with those, as of 12-31-2017, are as follows:

<b>Account Description</b>	<b>U S Dollar Amount</b>	<b>No. Accounts</b>
Discretionary	\$465,320,549	1,521
Non-Discretionary	\$188,744,822	1,330
Total Assets Under Management	\$654,065,371	2,851

**Third Party Money Managers**

We may determine that opening an account with a professional Third Party Money Manager is in your best interest. We primarily use Valmark Advisers, Inc. ("Valmark") when recommending a third party manager for your accounts. Some of our advisers and principals are also registered representatives of Valmark Securities and/or Valmark Advisers as detailed in Item 10 of this Brochure.

**ITEM 4 ADVISORY BUSINESS (CONTINUED)**

The money managers selected under these programs will have discretion to determine the securities they buy and sell within the account, subject to reasonable restrictions imposed by you. Due to the nature of these programs, each of the independent money managers is obligated to provide you with a separate advisory contract and disclosure document. You should carefully review these documents for important and specific program details, including pricing.

Under these programs, we may assist in the identification of investment objectives; recommend specific investment style and asset allocation strategies; assist in the selection of appropriate money managers; review performance and progress; recommend reallocation among managers or styles within the program; and recommend the hiring and firing of money managers utilized by you.

You should read the ADV Part 2 disclosure document of the money manager you select for complete details on the charges and fees you will incur. Please reference Item 12 below for details on fees and compensation issues with respect to our recommendation of Valmark.

**ITEM 5 FEES AND COMPENSATION****Consulting Fees**

The consulting, or planning, fees are based on the complexity of the client's needs and are established at the time of signing the Financial Advisory Agreement. Consulting fees are negotiable. The fee will be paid when the Financial Advisory Agreement is signed. In no case will Koss Olinger collect fees of \$1,200 or more for any financial plan that is expected to exceed six months until completion.

**Investment Advisory Account Fees: Private Client Accounts**

The Adviser provides a managed account program to its clients referred to as "Private Client Accounts" or "PCA." In most circumstances, the fee charged to clients covers the fee for investment advisory services, as well as commissions for brokerage execution.

"Unsolicited trades" (i.e., those trades requested by the client) will be charged applicable commissions and/or transaction fees. Trades solicited by Koss Olinger will, most often, have either no transaction/commission charged or Koss Olinger will reduce the quarterly fee by the amount of transaction/commissions charged to the client by the custodian for the account, Charles Schwab & Co., Inc. ("Schwab"). The majority of trades solicited by Koss Olinger will be for mutual funds, which have no transaction charge or commission imposed by Schwab. Koss Olinger does not share in any transaction fees or commissions charged or earned by Schwab.

Fees will be billed quarterly in advance based on the market value of the client's account on the last day of the previous quarter. The initial fee under the fee schedule is calculated from the date of inception to the end of the initial calendar quarter under the terms of the client agreement. Fees will be pro-rated with respect to amounts added to or withdrawn from accounts during each quarter. The amount of the Adviser's fees will be transmitted to the Custodian, from which the Custodian will debit the client's custodial account.

**ITEM 5 FEES AND COMPENSATION (CONTINUED)**

Fees to Koss Olinger are as follows:

<b>Market Value of Client Asset</b>	<b>Annual Fee</b>
\$1 to \$1,000,000	1.00%
\$1,000,001 to \$2,000,000	0.90%
\$2,000,001 to \$3,000,000	0.80%
\$3,000,001 to \$4,000,000	0.70%
\$4,000,001 to \$5,000,000	0.60%
\$5,000,001 to \$7,500,000	0.50%
\$7,500,001 to \$10,000,000	0.45%
\$10,000,001 to \$20,000,000	0.40%
\$20,000,000 or more	0.35%

The client will receive a statement showing the amount of the fee and the value of the client's assets on which the fee was based. The client is responsible for verifying the accuracy of the fee calculation, as the client's custodian will not determine whether the fee was properly calculated. Fees may be negotiated or waived under certain circumstances. For instance, related accounts (i.e. households or family relationships) can be consolidated for valuation of assets to determine the fees to be charged.

For custodians whose fees cannot be automatically deducted, a statement will be sent to the client that reflects the value of account assets and the fee amount due to the Adviser.

#### D. Third Party Money Manager Fees

In exchange for services provided by a Third Party Money Manager and the account custodian, each client agrees to pay annually a set percentage of the total assets held in the client's account. Further explanation regarding the fees associated with any Third Party Money Manager is provided in the Investment Advisory Agreement that each client signs before participating in any Third Party Money Manager program.

Advisory fees are generally collected from the client's account quarterly, in advance, and are based upon the aggregate market value of the assets in the client's Third Party Money Manager account at the close of business on the last business day of the preceding calendar quarter. The advisory fee charged to the client by the Third Party Money Manager and/or the IAR contracted to offer their advisory services will not exceed these established percentages:

<b>Avg. Account Balance</b>	<b>Total Annual Fee May Not Exceed</b>
\$50,000 to \$1,000,000	2.15%
\$1,000,001 to \$2,000,000	1.75%
\$2,000,001 and above	1.50%

The total advisory fee includes compensation for both the Third Party Money Manager and the designated IAR or RIA firm. The specific breakdown of these fees will be outlined on the advisory agreement pertaining to each account. The client will not pay additional trading costs associated with purchasing and/or selling securities. Trading fees will be paid by Valmark. Client should refer to the Third Party Money Manager's Wrap Fee Program Disclosure to see the program fees payable to Valmark Advisers, Inc. It also contains other account opening and servicing details.

#### GENERAL NOTES

Advisory fees charged are separate and distinct from the fees and expenses charged by mutual funds, which may be recommended to clients. Clients may incur certain charges imposed by third parties other than the Adviser. A description of these and other expenses are available in each fund's prospectus.

**ITEM 5 FEES AND COMPENSATION (CONTINUED)**

The Adviser will not be compensated on the basis of a share of capital gains or on capital appreciation of the funds or any portion of the funds of the client.

All information and advice furnished by either to the other, including their agents and employees, shall be treated as confidential and not disclosed to third parties except as agreed upon in writing or required by law.

The client may choose to use the programs individually or in combination. They are not restricted to only financial planning, for example. All fees may be negotiable at the sole discretion of the Adviser. The client or the Adviser may cancel the Agreement at any time with 10 days written notice to the other. In the event that the client wishes to cancel the Agreement prior to any services being performed, any advance payments shall be fully refunded. If the client cancels the Agreement after the Adviser has begun the services requested, the client shall be charged for the services completed and the remainder of any advance payments, if any, shall be refunded to the client within 30 days of the written request. If additional payment is due Adviser (time spent exceeds the deposit), an invoice shall be presented to the client and will be due upon receipt. Should the client terminate the Agreement within five business days after signing, no charges or penalties will be assessed. The client will be responsible for any fees or charges incurred by the client from third parties as a result of maintaining the account or for any securities transactions executed.

Should outside consultants be required in areas of special concern or expertise, their fee and/or time charge will be in addition to the planner's fee.

A client may invest in some mutual funds directly without the services of the Adviser. In that case, the client would not receive the services provided by the Adviser, which are designed, among other things, to assist the client in determining which investment management programs and money managers are most appropriate to the client's financial situation and objectives. The client should review both the fees charged by the funds and the fees charged by the Adviser and the other investment advisers chosen to fully understand the total amount of fees to be paid by the client. Only then will the client be able to fully evaluate the advisory services being provided and the fees being paid. In addition, the client may pay fees for custodial services, account maintenance, transaction fees and other fees associated with maintaining an account. Adviser does not share in any portion of such fees. Additional assets deposited into the account after the calendar quarter begins will be charged a pro-rata fee based upon the number of days remaining in the quarter. No fee adjustments will be made for partial withdrawals or for account appreciation or depreciation.

The client will receive a statement at least quarterly from the custodian of their account, detailing all transactions and fees deducted from the account for that calendar quarter.

**Additional Compensation:**

Associated persons of the Adviser, when acting as registered representative of Valmark Securities, Inc., may receive commissions through the sale of securities and insurance products to clients of the Adviser. This may create a conflict of interest. Commission rates may be found at other broker/dealers that are higher or lower than those charged at Valmark Securities, Inc. All accounts of the Adviser have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances and needs.

There is no additional compensation awarded for providing advisory services, such as sales awards or prizes. Our related persons may receive additional compensation for sales of insurance products, investment products, or other services through registration with Valmark Securities, Inc. They will also receive compensation for insurance sales through Executive Insurance Agency.

## ITEM 6 PERFORMANCE-BASED FEES

Koss Olinger does not accept performance-based fees, that is, fees based on a share of capital gains on or capital appreciation of the client's assets.

## ITEM 7 TYPES OF CLIENTS

The Advisory services that we offer include management of investment advisory accounts, investment supervisory services, investment advice through consultations, financial planning, and often, furnishing advice to clients on matters not involving securities.

Our client base includes individuals, pension and profit sharing plans, trusts, estates, charitable organizations, and corporations or business entities not already mentioned.

The new Koss Olinger Private Client should have a minimum of \$1,000,000 in investable assets and/ or \$5 million in net worth. However, the minimum may be waived for existing client relationships, employees and their relatives. There is no minimum account size for financial planning clients.

A client is expected to complete and sign various documents in order to establish an account. Some of the documents that a client would expect to complete and sign are the Risk Return Optimizer questionnaires, new account forms, a Financial Advisory Agreement and/or Private Client Account Agreement(s) and an Investment Portfolio Summary ("IPS").

## ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

The Adviser evaluates clients' investments to ascertain that the fundamental features are synchronized with the clients' financial objectives. A proposed portfolio is designed to help the client attain future financial security and the investments in the portfolio are stated in generic terms (for example, "growth stocks" and "municipal bonds").

The methods of analysis, investment strategies and any material risks in formulating our investment advice or managing of the assets are as follows:

**1. Fundamental Method:** For stocks, we use valuation ratios such as Price to Earnings ("P/E"), Price to Book ("P/B"), Shiller P/E (10 year-smoothed earnings), profit margins, and growth forecasts for each nation ("GDP"). These measures allow us to evaluate whether the market is expensive or cheap relative to historical valuations. This also gives a good idea of the risk-reward available for each security/asset class. Other valuation components are Return of Equity ("ROE"), Return of Assets ("ROA"), projected growth, free cash flow, and Debt to Equity Ratio ("D/E"). However, there are still risks with this strategy and investing in securities involves a risk of loss that you should be prepared to bear. For bonds, ratios such as Debt Service Coverage, spreads to risk-free securities such as comparable maturity Treasuries, credit ratings and duration measures are used to ascertain risk-reward available for each security/asset class.

**Material Risk:** This strategy still has risk as the market can be irrational from time to time. Outside or unforeseen events can cause a loss of principal. The main types of risk that are present are market risk (entire stock market falls out of favor and declines as a whole) and interest rate risk (sudden increases in interest rates may cause the value of principal to decrease). Through proper diversification some specific business risk can be mitigated as holding an individual stock exposes you to the risks specifically of that one company. Total portfolio measures, such as Beta, absolute returns, Sharpe Ratios and upside/downside capture ratios are also used to establish parameters for market risk.

**2. Technical:** 200-day, 50-day simple and exponential moving averages help display overbought or oversold conditions relative to the current price. We use this for specific asset classes to make tactical recommendations for our annual portfolio construction. However, there are still risks in this strategy and investing in securities involves a risk of loss that you should be prepared to bear.

## ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS (CONTINUED)

Material Risk: This strategy is useful for getting an overall idea as to where the market/security came from (its past pathway to the current price). One main risk with this strategy is that alone, it can be very dangerous to use as a primary tool because trend following can often lead to sharp losses of principal.

3. Other: The Adviser evaluates clients' investments to ascertain that the fundamental features are synchronized with the clients' financial objectives. A proposed portfolio is designed to help the client attain future financial security, and the investments in the portfolio are stated in generic terms (for example, "large growth stocks" and "municipal bonds"). Even though the adviser obtains information that is deemed to be accurate by the client, there are still risks in this strategy and investing in securities involves a risk of loss that you should be prepared to bear.

Material Risk: The risk of this strategy is mainly miscommunication. The adviser communicates with the client in order to get the best idea as to their level of risk tolerance and what types of securities they prefer to invest in.

Additional risk may be present if the client fails to disclose any outside assets or information that may hinder the adviser's ability to make a sound decision.

The main securities recommended are mutual funds, closed end funds, ETFs, bonds, and stocks. Their risk components are as follows:

- a. Mutual funds: market risk, manager risk
- b. Closed End Funds: market risk, manager risk, liquidity risk (some trade at discounts for prolonged periods of time)
- c. ETFS: market risk
- d. Bonds: interest rate risk, reinvestment risk, liquidity risk, default risk
- e. Stocks: company risk (specific), market risk

## ITEM 9 DISCIPLINARY INFORMATION

On 01-18-2018, Koss Olinger, as an advisory firm, received a summons relating to a civil action filed with the Circuit Court of Alachua County. The principals of the firm are in the process of formulating a response in concert with Valmark Securities Compliance and the assigned E&O attorney. The Firm will respond and contest the allegations.

Koss Olinger, as an advisory firm, or any member of our management team or any registered representative of the firm has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

Koss Olinger, as an advisory firm, or any member of our management team or any registered representative of the firm has not had any proceedings before a self-regulatory organization.

Koss Olinger, as an advisory firm, or any member of our management team or any registered representative of the firm has not had proceedings in which a professional attainment, designation or license was revoked or suspended.

## ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Koss Olinger does not, nor does any of the firm's management, have any applications pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

The principal business of Koss Olinger is as a Registered Investment Adviser. The principals and/or related persons of Koss Olinger are also licensed as insurance and securities professionals, and as such, are also in the business of offering securities and insurance products. Approximately 30% of the time of these principals and/or related persons is spent on activities related to these other products.

**ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS (CONTINUED)**

Certain of Adviser's principals and/or related persons are also registered representatives of Valmark Securities, Inc., a FINRA registered broker/dealer ("Valmark") and, as such, may place securities transactions through Valmark on behalf of their clients. In such instances, the principals and/or related persons may receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by FINRA. Additionally, certain of Adviser's principals and/or related persons are affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represent numerous insurance companies.

Any insurance product placed through these principals and/or related persons may generate standard and customary insurance commissions and other sums, a portion of which may be paid to the principals and/or related persons.

Valmark Securities and Executive Insurance Agency are material relationships to the Adviser, but are not related persons as defined in Form ADV.

Valmark may be contacted at the following:

Valmark Securities, Inc., 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Executive Insurance Agency may be contacted at the following:

Executive Insurance Agency, 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Koss Olinger will never serve as the custodian of either customer securities or accounts. Koss Olinger will recommend securities products offered by Valmark.

**ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

All personnel and associated persons of Koss Olinger strive to meet the highest ethical standards of behavior. Koss Olinger has adopted a formal Code of Ethics Policy, a copy of which is available to clients upon request.

The objective of Koss Olinger's policy is to assure that all personnel and associated persons clearly understand the level of commitment that is required on behalf of Koss Olinger's clients; to assure that client interests always take priority over the interests of Koss Olinger and its personnel; that personal securities transactions must avoid even the appearance of conflict with the interests of the clients; and that all applicable federal and state securities laws are complied with.

Associated persons of the Adviser are affiliated with Valmark Securities, Inc., a registered broker/dealer. The client will be advised that the Adviser may be receiving a fee for investment advice and a commission for any securities transactions performed. Activities listed and commissions earned are independent from and in addition to those of the Adviser.

Additionally, certain of Adviser's principals and/or related persons are affiliated with Executive Insurance Agency, Inc., a general insurance agency that represents numerous insurance companies. Any insurance product placed through these principals and/or related persons may generate standard and customary insurance commissions. These, and other sums, may be paid to the principals and/or related persons. Koss Olinger advises its clients that the receipt of commissions and other sums by its related persons for securities and insurance transactions may represent a conflict of interest.

## ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING (CONTINUED)

No supervised person may trade, either personally or on behalf of others, while in the possession of material, nonpublic information; nor may any personnel of Koss Olinger communicate material, nonpublic information to others.

Koss Olinger has adopted the following principles governing personal investment activities by Koss Olinger's supervised persons:

- At all times, the interests of client accounts will be placed first;
- All personal securities transactions will be conducted in such a manner as to avoid any actual or potential conflict of interest or any abuse of an individual's position of trust and responsibility;
- Supervised persons must not take inappropriate advantage of their positions.

Adviser's principals and registered representatives may buy or sell the same securities that are recommended to clients. Client accounts receive priority over any personal purchases and sales made by the principals and any such transactions will be fully disclosed to the client. Koss Olinger will abide by the rules and regulations of the Insider Trading and Securities Fraud Enforcement Act of 1988.

The Adviser's Principals and registered representatives must report to the Chief Compliance Officer ("CCO") all initial security holdings and transactions, as well as ongoing transactions. These transactions are reported and reviewed quarterly by the CCO.

All Adviser's Principals, registered representatives and their immediate family members security transactions are reported on separate trading reports and principally reviewed by the CCO on an ongoing basis, as required.

## ITEM 12 BROKERAGE PRACTICES

### The Custodian and Brokers We Use

Koss Olinger does not maintain custody of your assets that we manage/on which we advise, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15 – Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker/dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. ("Schwab"), a registered broker/dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we or you instruct them to. While we recommend that you use Schwab as a custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. We cannot manage your account if you do not wish to place your assets with Schwab. Not all advisors require their clients to use a particular broker/dealer or other custodian selected by the advisor. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see "Your Brokerage and Custody Costs").

### How We Select Brokers/Custodians

We seek to select/recommend/use a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)

**ITEM 12 BROKERAGE PRACTICES (CONTINUED)**

- Breadth of available investment products (including stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- Koss Olinger does not solicit or recommend IPO transactions in accordance with SEC regulations.
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see “Products and Services Available to Us from Schwab”)

**Your Brokerage and Custody Costs**

For our clients’ accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Schwab’s commission rates applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a total of at least \$ 10 million of their assets in accounts at Schwab. This commitment benefits you because the overall commission rates you pay are lower than they would be otherwise. In addition to commissions, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker/dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker/dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account(s). We have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How We Select Brokers/Custodians”).

**Products and Services Available to Us from Schwab**

Schwab Adviser Services™ (formerly called “Schwab Institutional®”) is Schwab’s business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage—trading, custody, reporting, and related services—many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts; while others help us manage and grow our business. Schwab’s support services generally are available on an unsolicited basis (we don’t have to request them) and at no charge to us as long as our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. If our clients collectively have less than \$10 million in assets at Schwab, Schwab may charge us quarterly service fees of \$1,200. Following is a more detailed description of Schwab’s support services:

**Services That Benefit You.** Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account(s).

**Services That May Not Directly Benefit You.** Schwab also makes available other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts. They include investment research, both Schwab’s own and that of third parties. We may use this research to service all or a substantial number of our clients’ accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data

**ITEM 12 BROKERAGE PRACTICES (CONTINUED)**

- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

There are times when Koss Olinger may aggregate trades. These aggregated, or block, trades are only done when advantageous in terms of operational efficiencies. Each client participating in an aggregated order receives the average share price for all of an adviser's transactions in that security on any given day. An adviser receives no additional compensation due to an aggregated order. Any trades must be allocated in a manner that does not consistently help or harm a particular client.

**Services That Generally Benefit Only Us.** Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events; Consulting on technology, compliance, legal, and business needs; Publications and conferences on practice management and business succession.

Schwab may provide some of these services itself. In other cases, it will arrange for third party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

**Our Interest in Schwab's Services**

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services so long as our clients collectively keep a total of at least \$10 million of their assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The \$10 million minimum may give us an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How We Select Brokers/Custodians") and not Schwab's services that benefit only us. We have \$654 million in client assets under management, and we do not believe that recommending our clients to collectively maintain at least \$10 million of those assets at Schwab in order to avoid paying Schwab quarterly service fees presents a material conflict of interest.

The corporation may suggest the availability of Valmark Securities, Inc., a broker/dealer, to place transactions on behalf of the client. The Adviser principals and Valmark Securities, Inc. will receive commissions based on the compensation schedule for the investment the client chooses to make. Valmark Securities, Inc. is recommended because of the wide variety of products offered, through research it makes available and the excellent client services it provides. Valmark Securities, Inc.'s commissions may not be the lowest in the industry.

Associated persons of the Adviser, when acting as registered representative of Valmark Securities, Inc. may receive commissions through the sale of securities and insurance products to clients of the Adviser. This may create a conflict of interest. Commission rates may be found at other broker/dealers which may be higher or lower than those charged at Valmark Securities, Inc. All accounts of the Adviser have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances, and needs.

**ITEM 13 REVIEW OF ACCOUNTS**

Reviews will be made on a periodic basis or upon request by the client, or in the event of a substantial change in the client's financial situation, i.e. sale or purchase of assets, death, etc. Changes in financial or family status during the previous year will be reviewed to determine changes in objectives of the client. The client is under no obligation to implement any recommendations by the Adviser nor is the client under obligation to engage the services of the Adviser.

Financial plans and account reviews may be done by any registered Adviser of the Firm listed in the ADV Brochure Part 2B Supplement.

Clients receive quarterly reports, which will generally include a list of transactions for the quarter, current investment allocations, and their account balances. Koss Olinger may exercise discretion upon rebalancing accounts based on the client's investment policy summary.

**ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION**

Koss Olinger does not provide economic benefit to any person(s) for client referrals. We do receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

**ITEM 15 CUSTODY**

As a matter of policy and practice, Koss Olinger does not permit employees or the firm to accept or maintain custody of client assets. It is our policy that we will not accept, hold, directly or indirectly, client funds or securities, or have any authority to obtain possession of them, including direct debiting of advisory fees. Koss Olinger will not intentionally take custody of client cash or securities.

The custody rule under the Investment Advisers Act of 1940 defines custody as "holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them." Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Schwab to deduct our advisory fees directly from your account [or if you grant us authority to move your money to another person's account]. Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab at least quarterly. They will be sent to the email or postal mailing address you provided to Schwab. You should carefully review those statements promptly when you receive them. We also urge you to compare Schwab's account statements to the periodic account statements/portfolio reports you will receive from us.

Robert E. Eberhard, as Chief Compliance Officer, has the responsibility for the implementation and monitoring of our policies, practices, disclosures and recordkeeping ensuring that we are not deemed a custodian.

**ITEM 16 INVESTMENT DISCRETION**

Koss Olinger may exercise discretion upon rebalancing accounts based on the client's Investment Policy Summary.

The client allows Koss Olinger to exercise this discretionary authority by signing the Private Client Account Agreement, which is used to open an account. Private Client Account language is as follows regarding discretionary authority: "Client hereby appoints Adviser as client's true and lawful agent with authority to act on client's behalf, based on client's Investment Policy Summary, effect discretionary authority to purchase, sell, and trade securities, including, but not limited to, Equities, Fixed Income Instruments, and Mutual Funds for client's account and all actions necessary or incident to such activities".

**ITEM 17 VOTING CLIENT SECURITIES**

Koss Olinger has adopted the following policies and the procedures regarding proxy voting for its clients' accounts:

Currently, Adviser has chosen not to retain voting authority over its clients' proxy voting and has left the voting authority to the clients. All proxy ballots will be sent directly to the client and not to the Adviser. Should the client wish to speak with the Adviser about advice on how to vote their proxies, they may do so by contacting Koss Olinger.

At all times, Adviser has a "duty of care" to its clients, and Koss Olinger recognizes and accepts this responsibility. Should the Adviser exercise voting authority over its clients' proxies, it must ensure that all proxies are handled in the best interests of the clients.

**ITEM 18 FINANCIAL INFORMATION**

Koss Olinger is required in this Item to provide certain financial information or disclosures about Koss Olinger's financial condition. Koss Olinger has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to its clients, and has not been the subject of a bankruptcy proceeding. Koss Olinger will not accept payments of more than \$1,200 more than six months in advance.

**PRIVACY POLICY****Your Privacy is Koss Olinger's Highest Priority**

At Koss Olinger and its affiliated companies, our customers are our highest priority. As providers of financial products and services that involve the collection of personal – and often sensitive – information, protecting the confidentiality of that information has been, and will continue to be, a top priority for Koss Olinger. Due to the sensitive nature of this personal information, Koss Olinger believes that you should know how your information is handled, the measures we have taken to safeguard that information and the situations in which we might share your information to complete transactions and/or service your account(s).

Our privacy promise to you is based upon the basic principles of trust, ethics and integrity.

**The Information Collected by Koss Olinger**

When you deal with Koss Olinger, certain personal and financial information is collected from you. Koss Olinger uses this information to serve your financial needs and to fulfill legal and regulatory requirements. The information gathered for these purposes varies depending on the products or services that you request, but may include, for example, your name, address, social security number, net worth, annual income and certain medical information.

**To Whom Your Information May Be Disclosed**

For both current and former customers, Koss Olinger restricts access to your personal and financial information to those instances described below:

**Individuals.** Your personal and financial information will be provided to those employees, registered representatives, their assistants and those who process information or the transactions of Koss Olinger in connection with the products or services being provided to you.

**PRIVACY POLICY (CONTINUED)**

**Where required by law or regulation.** Koss Olinger may be required by law or regulation to disclose your personal and /or financial information to a third party. For example, in response to a subpoena or to comply with industry rules and regulations.

**As authorized by you.** Only upon your direction or with your permission will Koss Olinger share your information with a third party other than as described in this notice.

**Affiliated companies.** We may share confidential information with service providers such as custodian broker/dealers, investment firms, mutual fund companies, or technical application providers, as needed, to effect transactions, provide account maintenance or customer service to your account.

**Protection of Information**

Koss Olinger has instituted security procedures that limit employee access to nonpublic personal information to those with a business reason for knowing such information. We educate our employees so that they will understand the importance of confidentiality and customer privacy. All Koss Olinger employees are aware of the company's privacy guidelines and Koss Olinger will take the appropriate disciplinary measures to enforce customer privacy assurances. Koss Olinger maintains appropriate security standards and procedures to prevent unauthorized access to customer information and to preserve the integrity of that information. As part of its fiduciary duty to its clients and as a matter of best business practices, Koss Olinger Companies, have adopted policies and procedures for disaster recovery and for continuing Koss Olinger Companies' business in the event of an emergency or a disaster. These policies are designed to allow Koss Olinger Companies to resume providing service to its clients in as short a period of time as possible. These policies are, to the extent practicable, designed to address those specific types of disasters that Koss Olinger Companies might reasonably face given its business and location.



**Form ADV Part 2B**

**Brochure Supplement**

**William David Olinger, III**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-21-2018

This brochure supplement provides information about William David Olinger, III that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure. Please contact Robert E. Eberhard if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

*Additional information about William David Olinger, III is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

William D. Olinger III is a Managing Member and Investment Adviser at Koss Olinger Consulting, LLC. He began his wealth management career in 1992. Mr. Olinger specializes in working with new clients by utilizing Koss Olinger's Wealth Navigator System™. His area of focus is learning about the client's goals and objectives and building a customized game plan which allows those aspirations to be attained.

Mr. Olinger graduated from Wake Forest University in 1991. He majored in Economics and minored in Finance. He earned his Certified Investment Management Analyst (CIMA®) designation from the Wharton School of Business, University of Pennsylvania. Mr. Olinger chairs the firm's Investment Advisory Committee and is responsible for analyzing alternative investments and researching macroeconomic trends. He is a contributing writer to the Oxford Club Investment Newsletter, and is an accomplished presenter at industry meetings and estate planning forums.

A founding board member of the Gainesville Community Foundation, Mr. Olinger also serves on the board of the Oak Hall School and is a volunteer coach for his daughters' sports teams.

### Education:

- Bachelor of Art in Economics, Wake Forest University
- Certified Investment Management Analyst

### Business Experience:

- Managing Member and Investment Adviser, Koss Olinger Consulting, LLC, 2009-present
- Managing Member and Financial Adviser, Koss Olinger and Company, LLC, 2009-present
- Registered Representative, Valmark Securities, Inc., 1999-present
- President and Managing Partner, Koss Olinger and Company, Inc., 2005-2009
- President and Managing Partner, Koss Olinger Consulting, Inc., 2004-2009
- Investment Adviser, Koss Olinger Consulting, Inc., 1999-2009
- Financial Adviser, Koss Olinger Financial Group, 1993-2009
- Investment Adviser, Valmark Advisers, Inc., 1999-2004
- Agent/Registered Representative, Ascend Financial Services, 1993-1998

### Certified Investment Management Analyst (CIMA)

*The CIMA certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. Prerequisites for the CIMA certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA certification, candidates must pass an online Qualification Examination, successfully complete a one-week classroom education program provided by a Registered Education Provider at an AACSB accredited university business school, and pass an online Certification Examination. CIMA designees are required to adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through Investment Management Consultants Association (IMCA).*

## DISCIPLINARY INFORMATION

- William D. Olinger, III has not had any civil or criminal actions brought against him.
- William D. Olinger, III has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- William D. Olinger, III has not had any proceedings before a self-regulatory organization.
- William D. Olinger, III has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

## OTHER BUSINESS ACTIVITIES

The principal business of Koss Olinger is as a Registered Investment Adviser. William D. Olinger, III is also licensed as an insurance and securities professional, and as such, is also in the business of offering securities and insurance products. Approximately 30% of his time is spent on activities related to these other products.

Mr. Olinger is also a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer ("Valmark") and, as such, may place securities transactions through Valmark on behalf of his clients. In such instances, the principals and/or related persons may receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by FINRA.

Additionally, Mr. Olinger is affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represents numerous insurance companies on his clients' behalf. Any insurance product placed by Mr. Olinger may generate standard and customary insurance commissions and other sums, a portion of which may be paid to Mr. Olinger.

Valmark Securities and Executive Insurance Agency are material relationships to the Adviser, but are not related persons as defined in Form ADV.

Valmark may be contacted at: Valmark Securities, Inc., 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Executive Insurance Agency may be contacted at Executive Insurance Agency, 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Koss Olinger will recommend securities products offered by Valmark.

## ADDITIONAL COMPENSATION

William D. Olinger, III, when acting as a registered representative of Valmark Securities, Inc. may receive commissions through the sale of securities and insurance products to clients.. This may create a conflict of interest. Commission rates may be found at other broker/dealers that are higher or lower than those charged at Valmark Securities, Inc. All accounts of the Adviser have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances, and needs.

There is no additional compensation awarded for providing advisory services, such as sales awards or prizes.

## SUPERVISION

Koss Olinger has adopted written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its businesses and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee and manager is required to be responsible for and monitor those individuals and departments he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements.

Robert E. Eberhard as the Chief Compliance Officer, has the overall responsibility for monitoring and testing compliance with Koss Olinger's policies and procedures.

Definition: "Supervised person" means directors, officers and partners of Koss Olinger (or other persons occupying a similar status or performing similar functions); employees of Koss Olinger; and any other person who provides advice on behalf of Koss Olinger and is subject to Koss Olinger's supervision and control.

The following is a brief outline of the major areas of responsibility of the Chief Compliance Officer in Koss Olinger's supervisory structure. Please note that these items are not, nor are they intended to be, a complete representation of the Chief Compliance Officer's responsibilities. This list is provided only as a general reference tool.

- 1) Approval of Customer Accounts -The Chief Compliance Officer must review all account documentation to ensure completion as well as the suitability of the proposed transaction relative to client needs, income, assets, risk tolerance and objectives.
- 2) Maintenance of Registered Representative Office Documentation - The Chief Compliance Officer shall maintain relevant files pertaining to all business conducted by any registered person under the supervision of the Chief Compliance Officer. Such files include customer files, transaction blotters, correspondence, advertising, sales memoranda, representative employment files, complaint files and cross-reference logs.
- 3) Processing of Sales/Transactions -The Chief Compliance Officer shall ensure that all transactions and supporting documentation are reviewed promptly. Additionally, the Chief Compliance Officer shall ensure that all checks and transactions are posted to appropriate internal records and copies are maintained in the appropriate files.
- 4) Review of Client Accounts -The Chief Compliance Officer shall ensure that all customer accounts receive a periodic review in order to ensure that all activity is consistent with client suitability standards. The Chief Compliance Officer shall further maintain a record of said review.
- 5) Review of Representative Status -The Chief Compliance Officer shall periodically review the status of all registered personnel assigned to his supervision in order to ensure that the representatives maintain the proper level of registration, state licensure and continuing education eligibility.
- 6) Annual Compliance Review -The Chief Compliance Officer shall ensure that all offices assigned to the Chief Compliance Officer are audited on at least an annual basis to confirm compliance with applicable state, federal, and FINRA regulations.



**Form ADV Part 2B**

**Brochure Supplement**

**Kirk Edward Klein**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-21-2018

This brochure supplement provides information about Kirk Edward Klein that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure. Please contact Robert E. Eberhard if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

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

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Kirk Klein is a Managing Member and Investment Adviser at Koss Olinger Consulting, LLC. He started his career in 1992 and has been with Koss Olinger since 1995. His years of financial experience have allowed him to counsel affluent individuals and business owners in the areas of estate and business- transition planning. A Certified Financial Planner™ (CFP®) Practitioner and Chartered Financial Consultant® (ChFC), Mr. Klein specializes in comprehensive financial planning by utilizing the firm's fee based 5 step process known as The Wealth Navigator System™, to help people accumulate, preserve and transfer personal wealth. He is an authority on business continuation and estate planning in closely held family businesses and was named in Kiplinger's Personal Finance magazine's "Who's Who of Florida Certified Financial Planner ® Professionals".

Mr. Klein is a graduate of Illinois State University with a Bachelor of Science degree in Finance and Marketing. An accomplished public speaker, he is a frequent presenter and guest lecturer for business and professional groups on topics about retirement, estate and financial planning. He is a qualifying member of the financial service industry's Million Dollar Round Table and a member of the Financial Planning Association.

Mr. Klein also enjoys giving back to the community. He is the past Chairman of the Board of Junior Achievement and has served on the boards of several other organizations such as the Rotary Club and Leadership Gainesville Alumni. He is also active on the Finance Committee at his church.

### Education:

- Bachelor of Art in Finance and Marketing, Illinois State University
- CERTIFIED FINANCIAL PLANNER™ Professional
- Chartered Financial Consultant®

### Business Experience:

- Managing Member and Investment Adviser, Koss Olinger Consulting, LLC, 2009-present
- Managing Member and Financial Adviser, Koss Olinger and Company, LLC, 2009-present
- Registered Representative, Valmark Securities, Inc., 1999-present
- Secretary and Managing Partner, Koss Olinger Consulting, Inc., 2004 - 2009
- Secretary and Managing Partner, Koss Olinger and Company, Inc., 2005 - 2009
- Investment Adviser, Koss Olinger Consulting, Inc., 1999-2009
- Financial Adviser, Koss Olinger Financial Group, 1995-2009
- Agent/Registered Representative, Ascend Financial Services, 1993-1998

**The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks")** are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

*The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.*

*To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:*

- *Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;*
- *Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;*
- *Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and*
- *Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.*

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE (CONTINUED)

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification. (for more information regarding the CFP® designation: <http://www.cfp.net/>)

**The Chartered Financial Consultant® (ChFC®)** credential was introduced in 1982 as an alternative to the CFP® mark. This designation has the same core curriculum as the CFP® designation, plus two or three additional elective courses that focus on various areas of personal financial planning. The biggest difference is that it does not require candidates to pass a comprehensive board exam, as with the CFP®.

Chartered Financial Consultant is a financial planning designation for the insurance industry awarded by the American College of Bryn Mawr. ChFCs must meet experience requirements and pass exams covering finance and investing. They must have at least three years of experience in the financial industry, and have studied and passed an examination on the fundamentals of financial planning, including income tax, insurance, investment and estate planning.

## DISCIPLINARY INFORMATION

- Kirk E. Klein has not had any civil or criminal actions brought against him.
- Kirk E. Klein has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- Kirk E. Klein has not had any proceedings before a self-regulatory organization.
- Kirk E. Klein has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

## OTHER BUSINESS ACTIVITIES

The principal business of Koss Olinger is as a Registered Investment Adviser. Kirk E. Klein is also licensed as an insurance and securities professional, and as such, is also in the business of offering securities and insurance products. Approximately 30% of his time is spent on activities related to these other products.

Mr. Klein is also a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer ("Valmark") and, as such, may place securities transactions through Valmark on behalf of their clients. In such instances, the principals and/or related persons may receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by FINRA.

Additionally, Mr. Klein is affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represents numerous insurance companies on his clients' behalf. Any insurance product placed by Mr. Klein may generate standard and customary insurance commissions and other sums, a portion of which may be paid to Mr. Klein.

## OTHER BUSINESS ACTIVITIES (CONTINUED)

Valmark Securities and Executive Insurance Agency are material relationships to the Adviser, but are not related persons as defined in Form ADV.

Valmark may be contacted at: Valmark Securities, Inc., 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Executive Insurance Agency may be contacted at Executive Insurance Agency, 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Koss Olinger will recommend securities products offered by Valmark.

## ADDITIONAL COMPENSATION

Mr. Klein, when acting as a registered representative of Valmark Securities, Inc. may receive commissions through the sale of securities and insurance products to clients of the Adviser. This may create a conflict of interest. Commission rates may be found at other broker/dealers that are higher or lower than those charged at Valmark Securities, Inc. All accounts of the Adviser have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances, and needs.

There is no additional compensation awarded for providing advisory services, such as sales awards or prizes.

## SUPERVISION

Koss Olinger has adopted written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its businesses and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee and manager is required to be responsible for and monitor those individuals and departments he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements.

Robert E. Eberhard as the Chief Compliance Officer, has the overall responsibility for monitoring and testing compliance with Koss Olinger's policies and procedures.

Definition: "Supervised person" means directors, officers and partners of Koss Olinger (or other persons occupying a similar status or performing similar functions); employees of Koss Olinger; and any other person who provides advice on behalf of Koss Olinger and is subject to Koss Olinger's supervision and control.

The following is a brief outline of the major areas of responsibility of the Chief Compliance Officer in Koss Olinger's supervisory structure. Please note that these items are not, nor are they intended to be, a complete representation of the Chief Compliance Officer's responsibilities. This list is provided only as a general reference tool.

- 1) Approval of Customer Accounts -The Chief Compliance Officer must review all account documentation to ensure completion as well as the suitability of the proposed transaction relative to client needs, income, assets, risk tolerance and objectives.
- 2) Maintenance of Registered Representative Office Documentation - The Chief Compliance Officer shall maintain relevant files pertaining to all business conducted by any registered person under the supervision of the Chief Compliance Officer. Such files include customer files, transaction blotters, correspondence, advertising, sales memoranda, representative employment files, complaint files and cross-reference logs.
- 3) Processing of Sales/Transactions -The Chief Compliance Officer shall ensure that all transactions and supporting documentation are reviewed promptly. Additionally, the Chief Compliance Officer shall ensure that all

**SUPERVISION (CONTINUED)**

checks and transactions are posted to appropriate internal records and copies maintained in the appropriate files.

4) Review of Client Accounts -The Chief Compliance Officer shall ensure that all customer accounts receive a periodic review in order to insure that all activity is consistent with client suitability standards. The Chief Compliance Officer shall further maintain a record of said review.

5) Review of Representative Status -The Chief Compliance Officer shall periodically review the status of all registered personnel assigned to his supervision in order to ensure that the representatives maintain the proper level of registration, state licensure and continuing education eligibility.

6) Annual Compliance Review -The Chief Compliance Officer shall ensure that all offices assigned to the Chief Compliance Officer are audited on at least an annual basis to confirm compliance with applicable state, federal, and FINRA regulations.



**Form ADV Part 2B**

**Brochure Supplement**

**William David Olinger, II**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-21-2018

This brochure supplement provides information about William David Olinger, II that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure.

Please contact Robert E. Eberhard if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

*Additional information about William David Olinger, II is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

The Co-Founder of Koss Olinger Financial Group with William F. Koss in 1969 and now a Member and Investment Adviser at Koss Olinger Consulting, LLC, William D. Olinger II specializes in helping clients manage and preserve their wealth and transfer it to successive generations. With over 45 years of experience in wealth and investment management, Mr. Olinger is a Chartered Life Underwriter (CLU) and Chartered Financial Consultant (ChFC) with a Masters of Science degree in Financial Services (MSFS) from The American College. In addition, he holds designations in pension planning from Farleigh Dickinson University and Purdue University and is a life and qualifying member of the Million Dollar Round Table. He is the past President of the Gainesville Estate Planning Council and the Gainesville Association of Life Underwriters and is a member of the Financial Planning Association.

Mr. Olinger graduated Phi Kappa Phi from the University of Florida with a Bachelor of Arts degree in Political Science and a minor in Economics. He was a four-year letterman in diving on the University of Florida swim team and President of Sigma Chi Fraternity. An active member of the Central Florida business and civic community, Mr. Olinger has served as Chairman of the Council for Economic Outreach and Chairman of the Board of Trustees of Santa Fe Community College, as well as the Chairman of the Board of Trustees for First Presbyterian Church. He has been President of the March of Dimes, the Gator City Kiwanis Club, the YMCA and has served on the boards of numerous organizations, including the United Way, the Rotary Club of Gainesville, Barnett Bank of Alachua County and the Florida Museum of Natural History.

### Education:

- Bachelor of Art in Political Science and Economics, University of Florida
- Master of Science in Financial Services, American College
- Chartered Financial Consultant®
- Chartered Life Underwriter

### Business Experience:

- Investment Adviser, Koss Olinger Consulting, LLC, 2009-present
- Financial Adviser, Koss Olinger and Company, LLC, 2009-present
- Branch Manager and Registered Principal, Valmark Securities, Inc., 1999-present
- Vice President and Founding Partner, Koss Olinger Consulting, Inc., 2004 - 2009
- Vice President and Founding Partner, Koss Olinger and Company, Inc., 2005 - 2009
- Investment Adviser, Koss Olinger Consulting, Inc., 1987-2009
- Financial Adviser, Koss Olinger Financial Group, 1969-2009
- President, Koss Olinger and Company, Inc., 1969 - 2004
- Secretary and Treasurer, Koss Olinger Consulting, Inc., 1983-2003
- Branch Manager/Independent Contractor, Raymond James Financial, Inc. 1987-2000

**The Chartered Financial Consultant® (ChFC®)** credential was introduced in 1982 as an alternative to the CFP® mark. This designation has the same core curriculum as the CFP® designation, plus two or three additional elective courses that focus on various areas of personal financial planning. The biggest difference is that it does not require candidates to pass a comprehensive board exam, as with the CFP®.

Chartered Financial Consultant is a financial planning designation for the insurance industry awarded by the American College of Bryn Mawr. ChFCs must meet experience requirements and pass exams covering finance and investing. They must have at least three years of experience in the financial industry, and have studied and passed an examination on the fundamentals of financial planning, including income tax, insurance, investment and estate planning.

### Chartered Life Underwriter

The CLU® is widely considered to be the most respected insurance designation in the industry. This designation was created in 1927 by the American College in Bryn Mawr, Pa. The CLU® has traditionally been pursued by agents who wish to specialize in life insurance for business or estate-planning purposes. The current course curriculum for the CLU® includes five required courses plus three elective courses. The required courses include the following:

- Fundamentals of insurance planning
- Life insurance law
- Individual life insurance
- Estate planning
- Planning for business owners

The three elective courses can be chosen from such subjects as the following:

- Financial planning
- Health insurance

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE (CONTINUED)

- Income taxation
- Group benefits
- Retirement planning
- Investment planning

**The Master of Science in Financial Services** is a degree program designed to advance the careers of a wide range of planning professionals including financial planners, life insurance specialists, trust officers and investment consultants.

The MSFS degree requires the completion of 36 course credits (6 credits from the residency and 30 credits from the remaining required and elective courses.) Course topics include:

- Financial Planning
- Investments
- Real Estate
- Portfolio Management
- Insurance
- Retirement Plans & Employee Benefits

## DISCIPLINARY INFORMATION

- A. William D. Olinger, II has not had any civil or criminal actions brought against him.
- B. William D. Olinger, II has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- C. William D. Olinger, II has not had any proceedings before a self-regulatory organization.
- D. William D. Olinger, II has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

## OTHER BUSINESS ACTIVITIES

The principal business of Koss Olinger is as a Registered Investment Adviser. William D. Olinger, II is also licensed as an insurance and securities professional, and as such, is also in the business of offering securities and insurance products. Approximately 30% of his time is spent on activities related to these other products.

Mr. Olinger is also a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer ("Valmark") and, as such, may place securities transactions through Valmark on behalf of their clients. In such instances, the principals and/or related persons may receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by the FINRA.

Additionally, Mr. Olinger is affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represents numerous insurance companies on his clients' behalf. Any insurance product placed by Mr. Olinger may generate standard and customary insurance commissions and other sums, a portion of which may be paid to Mr. Olinger.

Valmark Securities and Executive Insurance Agency are material relationships to the Adviser, but are not related persons as defined in Form ADV.

Valmark may be contacted at: Valmark Securities, Inc., 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

## OTHER BUSINESS ACTIVITIES (CONTINUED)

Executive Insurance Agency may be contacted at Executive Insurance Agency, 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Koss Olinger will recommend securities products offered by Valmark.

## ADDITIONAL COMPENSATION

William D. Olinger, II, when acting as registered representative of Valmark Securities, Inc. may receive commissions through the sale of securities and insurance products to clients of the Adviser. This may create a conflict of interest. Commission rates may be found at other broker/dealers that are higher or lower than those charged at Valmark Securities, Inc. All accounts of the Adviser have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances, and needs.

There is no additional compensation awarded for providing advisory services, such as sales awards or prizes.

## SUPERVISION

Koss Olinger has adopted written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its businesses and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee and manager is required to be responsible for and monitor those individuals and departments he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements.

Robert E. Eberhard as the Chief Compliance Officer, has the overall responsibility for monitoring and testing compliance with Koss Olinger's policies and procedures.

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**SUPERVISION (CONTINUED)**

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**Form ADV Part 2B**

**Brochure Supplement**

**William Frederick Koss**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-21-2018

This brochure supplement provides information about William Frederick Koss that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure. Please contact Robert E. Eberhard if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

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

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

William F. Koss has worked professionally for over 45 years in the financial disciplines of estate planning and investment management and in 1969 joined William D. Olinger II to establish Koss Olinger Financial Group. He is currently a Member and Investment Adviser at Koss Olinger Consulting, LLC. As one of the firm's Founding Partners, he specializes in helping clients preserve their wealth and transfer it to successive generations.

A Chartered Life Underwriter (CLU) and Chartered Financial Consultant (ChFC), Mr. Koss is a life and qualifying member of the Million Dollar Round Table. His 40 continuous years of qualification, along with his professional designations place him among the top 100 professional planners in the world.

In addition, he has published numerous articles in professional journals and consumer publications and is the author of the book, "Pond Birds", the only history of the University of Florida's basketball program. Mr. Koss was a three-year letterman in basketball at the University of Florida and was inducted into the University of Florida Athletic Hall of Fame in 2008. He remains visible to Florida fans through his work as a television sports commentator and public speaker.

He grew up in Bridgeport, Ohio, received a post-graduate degree from Manlius Military Academy, earned a Bachelor's degree in Business Administration at the University of Florida, and holds a Master's of Science degree in Financial Services from The American College.

A founding member and past Chairman of the Council for Economic Outreach, Mr. Koss won the J. Wayne Reitz Award for his contributions to the region's economic development. The Gainesville Business Magazine named him Financial Services Man of the Year in 1990, and The Gainesville Sun recognized him as the 1994 Business Person of the Year.

### Education:

- Bachelor of Art in Business Administration, University of Florida
- Master of Science in Financial Services, American College
- Chartered Financial Consultant®
- Chartered Life Underwriter

### Business Experience:

- Investment Adviser, Koss Olinger Consulting, LLC, 2009-present
- Financial Adviser, Koss Olinger and Company, LLC, 2009-present
- Registered Representative, Valmark Securities, Inc., 1999-present
- Treasurer and Founding Partner, Koss Olinger Consulting, Inc., 2004 - 2009
- Treasurer and Founding Partner, Koss Olinger and Company, Inc., 2005 - 2009
- Investment Adviser, Koss Olinger Consulting, Inc., 1987-2009
- Financial Adviser, Koss Olinger Financial Group, 1969-2009
- Secretary/Treasurer, Koss Olinger and Company, Inc., 1969 - 2004
- President, Koss Longer Consulting, Inc., 1983-2003
- Registered Representative, Ascend Financial Services, 1989-1998

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## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE (CONTINUED)

### Chartered Life Underwriter

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The three elective courses can be chosen from such subjects as the following:

- Financial planning
- Health insurance
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- Group benefits
- Retirement planning
- Investment planning

## DISCIPLINARY INFORMATION

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Mr. Koss is also a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer ("Valmark") and, as such, may place securities transactions through Valmark on behalf of their clients. In such instances, the principals and/or related persons may receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by FINRA.

Additionally, Mr. Koss is affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represents numerous insurance companies on his clients' behalf. Any insurance product placed by Mr. Koss may generate standard and customary insurance commissions and other sums, a portion of which may be paid to Mr. Koss.

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## OTHER BUSINESS ACTIVITIES (CONTINUED)

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## ADDITIONAL COMPENSATION

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**SUPERVISION (CONTINUED)**

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**Form ADV Part 2B**  
**Brochure Supplement**

**William James Rossi, III**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-21-2018

This brochure supplement provides information about William James Rossi, III that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure. Please contact Robert E. Eberhard if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

*Additional information about William James Rossi, III is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

William J. Rossi is a Partner at Koss Olinger Consulting, LLC. He began his financial services career in 1997 after earning Bachelor of Science degrees in Finance and Economics from the University of Florida. Soon after, he obtained both the Certified Financial Planner (CFP®) and Chartered Financial Consultant (ChFC) designations.

Mr. Rossi's areas of expertise are investment management, estate planning, and creating income distribution strategies during retirement. He sits on Koss Olinger's Investment Advisory Committee. Mr. Rossi's professional insights about comprehensive fee based planning, as used in The Wealth Navigator System, have been quoted in local and national publications, including Money magazine. Additionally, Mr. Rossi has spoken at industry conferences such as Million Dollar Round Table's "Top of the Table".

A resident of Gainesville since 1987, Mr. Rossi is active in the community serving on board positions at University of Florida's Performing Arts Center, Tyler's Hope, and Stop! Children's Cancer and is an active member of NAIFA Gainesville, and Gainesville Estate Planning Council. WJ is also a member of the Rotary Club, and Leadership Gainesville Alumni.

### Education:

- Bachelors of Science in Finance and Economics, University of Florida
- CERTIFIED FINANCIAL PLANNER™ Professional
- Chartered Financial Consultant®

### Business Experience:

- Member and Investment Adviser, Koss Olinger Consulting, LLC, 2009-present
- Member and Financial Adviser, Koss Olinger and Company, LLC, 2009-present
- Registered Representative, Valmark Securities, Inc., 1999-present
- Partner and Investment Adviser, Koss Olinger Consulting, Inc., 2004 - 2009
- Partner and Financial Adviser, Koss Olinger and Company, Inc., 2005 - 2009
- Investment Adviser, Koss Olinger Consulting, Inc., 1997-2009
- Financial Adviser, Koss Olinger Financial Group, 1997-2009
- Registered Representative/Independent Contractor Raymond James Financial, Inc., 1997-2000
- Finance Intern, Koss Olinger Financial Group, 1996-1997

**The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks")** are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

*The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.*

*To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:*

- *Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;*
- *Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;*
- *Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and*
- *Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.*

*Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:*

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE (CONTINUED)

- *Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and*
  - *Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.*
- CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.*  
*(for more information regarding the CFP® designation: <http://www.cfp.net/>)*

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## DISCIPLINARY INFORMATION

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## OTHER BUSINESS ACTIVITIES

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Mr. Rossi is also a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer ("Valmark") and, as such, may place securities transactions through Valmark on behalf of their clients. In such instances, the principals and/or related persons may receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by FINRA.

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## OTHER BUSINESS ACTIVITIES (CONTINUED)

Executive Insurance Agency may be contacted at Executive Insurance Agency, 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Koss Olinger will recommend securities products offered by Valmark.

## ADDITIONAL COMPENSATION

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Robert E. Eberhard as the Chief Compliance Officer, has the overall responsibility for monitoring and testing compliance with Koss Olinger's policies and procedures.

Definition: "Supervised person" means directors, officers and partners of Koss Olinger (or other persons occupying a similar status or performing similar functions); employees of Koss Olinger; and any other person who provides advice on behalf of Koss Olinger and is subject to Koss Olinger's supervision and control.

The following is a brief outline of the major areas of responsibility of the Chief Compliance Officer in Koss Olinger's supervisory structure. Please note that these items are not, nor are they intended to be, a complete representation of the Chief Compliance Officer's responsibilities. This list is provided only as a general reference tool.

- 1) Approval of Customer Accounts -The Chief Compliance Officer must review all account documentation to insure completion as well as the suitability of the proposed transaction relative to client needs, income, assets, risk tolerance and objectives.
- 2) Maintenance of Registered Representative Office Documentation - The Chief Compliance Officer shall maintain relevant files pertaining to all business conducted by any registered person under the supervision of the Chief Compliance Officer. Such files include customer files, transaction blotters, correspondence, advertising, sales memoranda, representative employment files, complaint files and cross-reference logs.
- 3) Processing of Sales/Transactions -The Chief Compliance Officer shall ensure that all transactions and supporting documentation are reviewed promptly. Additionally, the Chief Compliance Officer shall ensure that all checks and transactions are posted to appropriate internal records and copies maintained in the appropriate files.
- 4) Review of Client Accounts -The Chief Compliance Officer shall ensure that all customer accounts receive a periodic review in order to ensure that all activity is consistent with client suitability standards. The Chief Compliance Officer shall further maintain a record of said review.

**SUPERVISION (CONTINUED)**

5) Review of Representative Status -The Chief Compliance Officer shall periodically review the status of all registered personnel assigned to his supervision in order to ensure that the representatives maintain the proper level of registration, state licensure and continuing education eligibility.

6) Annual Compliance Review -The Chief Compliance Officer shall ensure that all offices assigned to the Chief Compliance Officer are audited on at least an annual basis to confirm compliance with applicable state, federal, and FINRA regulations.



**Form ADV Part 2B**

**Brochure Supplement**

**Brian Earl Watson**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-21-2018

This brochure supplement provides information about Brian Earl Watson that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure. Please contact Robert E. Eberhard if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

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

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Brian Watson is a Partner at Koss Olinger Consulting, LLC. He began his wealth management career in 1998 after earning a Bachelor of Science degree in Finance from the University of Florida. A Certified Financial Planner (CFP®) practitioner, Mr. Watson's areas of expertise are retirement planning, investment management and estate planning.

As a respected analyst, Mr. Watson has been quoted in local and national publications such as The Gainesville Sun, Senior Times (a widely read Florida publication for senior citizens), and The Prosperity Experience (a national publication that focuses on financial and estate planning issues for lottery winners).

Mr. Watson brings strong information technology skills to the firm as well. He was instrumental in designing the firm's management reporting systems and helped develop The Wealth Navigator System™, an advanced planning process that is at the center of the firm's overall consulting services.

### Education:

- Bachelor of Art in Business Administration, University of Florida
- CERTIFIED FINANCIAL PLANNER™ Professional

### Business Experience:

- Member and Investment Adviser, Koss Olinger Consulting, LLC, 2009-present
- Member and Financial Adviser, Koss Olinger and Company, LLC, 2009-present
- Registered Representative, Valmark Securities, Inc., 1999-present
- Partner and Investment Adviser, Koss Olinger Consulting, Inc., 2004-2009
- Partner and Financial Adviser, Koss Olinger and Company, Inc., 2005-2009
- Investment Adviser, Koss Olinger Consulting, Inc., 2000-2009
- Financial Adviser, Koss Olinger Financial Group, 1998-2009

**The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks")** are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

*The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:*

- *Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;*
- *Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;*
- *Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and*
- *Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.*

*Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:*

- *Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and*
- *Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.*

*CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification. (for more information regarding the CFP® designation: <http://www.cfp.net/>)*

## DISCIPLINARY INFORMATION

- A. Brian Watson has not had any civil or criminal actions brought against him.
- B. Brian Watson has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- C. Brian Watson has not had any proceedings before a self-regulatory organization.
- D. Brian Watson has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

## OTHER BUSINESS ACTIVITIES

The principal business of Koss Olinger is as a Registered Investment Adviser. Brian Watson, is also licensed as an insurance and securities professional, and as such, is also in the business of offering securities and insurance products. Approximately 30% of his time is spent on activities related to these other products.

Mr. Watson is also a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer ("Valmark") and, as such, may place securities transactions through Valmark on behalf of their clients. In such instances, the principals and/or related persons may receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by the FINRA.

Additionally, Mr. Watson is affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represents numerous insurance companies on his clients' behalf. Any insurance product placed by Mr. Watson may generate standard and customary insurance commissions and other sums, a portion of which may be paid to Mr. Watson.

Valmark Securities and Executive Insurance Agency are material relationships to the Adviser, but are not related persons as defined in Form ADV.

Valmark may be contacted at: Valmark Securities, Inc., 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Executive Insurance Agency may be contacted at Executive Insurance Agency, 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Koss Olinger will recommend securities products offered by Valmark.

## ADDITIONAL COMPENSATION

Brian Watson, when acting as registered representative of Valmark Securities, Inc. may receive commissions through the sale of securities and insurance products to clients of the Adviser. This may create a conflict of interest. Commission rates may be found at other broker/dealers that are higher or lower than those charged at Valmark Securities, Inc. All accounts of the Adviser have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances, and needs.

There is no additional compensation awarded for providing advisory services, such as sales awards or prizes.

## SUPERVISION

Koss Olinger has adopted written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its businesses and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee and manager is required to be responsible for and monitor those individuals and departments he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements.

Robert E. Eberhard as the Chief Compliance Officer, has the overall responsibility for monitoring and testing compliance with Koss Olinger's policies and procedures.

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- 6) Annual Compliance Review -The Chief Compliance Officer shall ensure that all offices assigned to the Chief Compliance Officer are audited on at least an annual basis to confirm compliance with applicable state, federal, and FINRA regulations.

**Form ADV Part 2B**

**Brochure Supplement**

**Timothy Alderson**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-21-2018

This brochure supplement provides information about Timothy Alderson Roark that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure. Please contact Robert E. Eberhard if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

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

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Timothy Roark is an Investment Adviser at Koss Olinger Consulting, LLC. He began his wealth management career in 2011 after receiving a Master's degree in Business from Duke University. Mr. Roark is a CERTIFIED FINANCIAL PLANNER™ (CFP®), earning the designation in 2014. Mr. Roark's areas of expertise are retirement planning, investment management and estate planning.

Mr. Roark received a Bachelor of Arts degree in Anthropology from Davidson College. He was a four year member of the men's varsity soccer team at Davidson.

### Education:

- Master's in Business, Duke University
- Bachelor of Art in Anthropology, Davidson College
- CERTIFIED FINANCIAL PLANNER™ Professional

### Business Experience:

- Investment Adviser, Koss Olinger Consulting, LLC, 2011-present
- Registered Representative, Valmark Securities, Inc., 2011-present

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- *Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;*
- *Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;*
- *Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and*
- *Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.*

*Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:*

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- *Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.*

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## DISCIPLINARY INFORMATION

- A. Timothy Roark has not had any civil or criminal actions brought against him.
- B. Timothy Roark has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- C. Timothy Roark has not had any proceedings before a self-regulatory organization.
- D. Timothy Roark has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

## OTHER BUSINESS ACTIVITIES

The principal business of Koss Olinger is as a Registered Investment Adviser, Timothy Roark, is also licensed as an insurance and securities professional, and as such, is also in the business of offering securities and insurance products. Approximately 30% of his time is spent on activities related to these other products.

Mr. Roark is also a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer ("Valmark") and, as such, may place securities transactions through Valmark on behalf of their clients. In such instances, the principals and/or related persons may receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by the FINRA.

Additionally, Mr. Roark is affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represents numerous insurance companies on his clients' behalf. Any insurance product placed by Mr. Roark may generate standard and customary insurance commissions and other sums, a portion of which may be paid to Mr. Roark.

Valmark Securities and Executive Insurance Agency are material relationships to the Adviser, but are not related persons as defined in Form ADV.

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Executive Insurance Agency may be contacted at Executive Insurance Agency, 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Koss Olinger will recommend securities products offered by Valmark.

## ADDITIONAL COMPENSATION

Timothy Roark, when acting as registered representative of Valmark Securities, Inc. may receive commissions through the sale of securities and insurance products to clients of the Adviser. This may create a conflict of interest. Commission rates may be found at other broker/dealers that are higher or lower than those charged at Valmark Securities, Inc. All accounts of the Adviser have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances, and needs.

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## SUPERVISION

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**Form ADV Part 2B**

**Brochure Supplement**

**Shannon Louise Hord**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-21-2018

This brochure supplement provides information about Timothy Alderson Roark that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure.

Please contact Robert E. Eberhard if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

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

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Shannon Hord is an Investment Adviser at Koss Olinger Consulting, LLC. She began her wealth management career in 2013 after receiving a Bachelor of Science degree in Finance from the University of Florida.

### Education:

- Bachelor of Science in Finance, University of Florida

### Business Experience:

- Investment Adviser, Koss Olinger Consulting, LLC, 2013-present
- Registered Representative, Valmark Securities, Inc., 2013-present

## DISCIPLINARY INFORMATION

- A. Shannon Hord has not had any civil or criminal actions brought against her.
- B. Shannon Hord has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- C. Shannon Hord has not had any proceedings before a self-regulatory organization.
- D. Shannon Hord has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

## OTHER BUSINESS ACTIVITIES

The principal business of Koss Olinger is as a Registered Investment Adviser, Shannon Hord, is also licensed as an insurance and securities professional, and as such, is also in the business of offering securities and insurance products. Approximately 30% of her time is spent on activities related to these other products.

Ms. Hord is also a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer ("Valmark") and, as such, may place securities transactions through Valmark on behalf of their clients. In such instances, the principals and/or related persons may receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by the FINRA.

Additionally, Ms. Hord is affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represents numerous insurance companies on his clients' behalf. Any insurance product placed by Ms. Hord may generate standard and customary insurance commissions and other sums, a portion of which may be paid to Ms.Hord.

Valmark Securities and Executive Insurance Agency are material relationships to the Adviser, but are not related persons as defined in Form ADV.

Valmark may be contacted at: Valmark Securities, Inc., 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Executive Insurance Agency may be contacted at Executive Insurance Agency, 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Koss Olinger will recommend securities products offered by Valmark.

## ADDITIONAL COMPENSATION

Shannon Hord, when acting as registered representative of Valmark Securities, Inc. may receive commissions through the sale of securities and insurance products to clients of the Adviser. This may create a conflict of interest. Commission rates may be found at other broker/dealers that are higher or lower than those charged at Valmark Securities, Inc. All accounts of the Adviser have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances, and needs.

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## SUPERVISION

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**Form ADV Part 2B**

**Brochure Supplement**

**Mitchell Hawkes Hay**

2700 NW 43rd Street  
Suite A Gainesville, FL 32606

Phone: 352-373-3337

03-21-2018

This brochure supplement provides information about Mitchell Hawkes Hay that supplements the Koss Olinger Consulting, LLC brochure. You should have received a copy of that brochure.

Please contact Robert E. Eberhard if you did not receive Koss Olinger Consulting, LLC's brochure or if you have any questions about the contents of this supplement.

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

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Mitchell Hay is an Investment Adviser at Koss Olinger Consulting, LLC. He started his wealth management career in 2016 after earning a degree in Finance and minor in Economics from the University of Alabama. He has been with Koss Olinger Consulting, LLC since 2017.

### Education:

- Bachelor of Science in Finance, University of Alabama

### Business Experience:

- Investment Adviser, Koss Olinger Consulting, LLC, 2017-present
- Registered Representative, Valmark Securities, Inc., 2017-present
- Registered Representative, Valmark Securities, Inc., 2017-present
- Registered Representative, Fidelity Investments, 2016-2017

## DISCIPLINARY INFORMATION

- A. Mitchell Hay has not had any civil or criminal actions brought against him.
- B. Mitchell Hay has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- C. Mitchell Hay has not had any proceedings before a self-regulatory organization.
- D. Mitchell Hay has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

## OTHER BUSINESS ACTIVITIES

The principal business of Koss Olinger is as a Registered Investment Adviser, Mitchell Hay, is also licensed as an insurance and securities professional, and as such, is also in the business of offering securities and insurance products. Approximately 30% of his time is spent on activities related to these other products.

Mr. Hay is also a registered representative of Valmark Securities, Inc., a FINRA registered broker/ dealer ("Valmark") and, as such, may place securities transactions through Valmark on behalf of their clients. In such instances, the principals and/or related persons may receive commissions, 12b-1 fees or other sums for any securities transactions placed through Valmark. Clients are not required to place their securities transactions through Valmark and may use any broker/dealer they desire. For securities transactions placed through Valmark, commissions for securities paid pursuant to a prospectus will be the same. However, commissions or fees for other securities transactions may be higher or lower if placed through Valmark than if placed through another broker/dealer. Valmark provides related persons/registered representatives with due diligence, compliance information and regulatory review. Furthermore, all securities transactions made on behalf of a client and placed through Valmark are reviewed and approved by Valmark supervisory principals as required by the FINRA.

Additionally, Mr. Hay is affiliated with Executive Insurance Agency, Inc., a general insurance agency, and as such, represents numerous insurance companies on his clients' behalf. Any insurance product placed by Mr. Hay may generate standard and customary insurance commissions and other sums, a portion of which may be paid to Mr. Hay.

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Executive Insurance Agency may be contacted at Executive Insurance Agency, 130 Springside Drive, Suite 300, Akron, OH 44333-2431, (800) 765-5201.

Koss Olinger will recommend securities products offered by Valmark.

## ADDITIONAL COMPENSATION

Mitchell Hay, when acting as registered representative of Valmark Securities, Inc. may receive commissions through the sale of securities and insurance products to clients of the Adviser. This may create a conflict of interest. Commission rates may be found at other broker/dealers that are higher or lower than those charged at Valmark Securities, Inc. All accounts of the Adviser have been researched to the extent needed to produce financial advice or make investment suggestions for the client based on client goals, objectives, risk tolerances, and needs.

There is no additional compensation awarded for providing advisory services, such as sales awards or prizes.

## SUPERVISION

Koss Olinger has adopted written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its businesses and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee and manager is required to be responsible for and monitor those individuals and departments he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements.

Robert E. Eberhard as the Chief Compliance Officer has the overall responsibility for monitoring and testing compliance with Koss Olinger's policies and procedures.

Definition: "Supervised person" means directors, officers and partners of Koss Olinger (or other persons occupying a similar status or performing similar functions); employees of Koss Olinger; and any other person who provides advice on behalf of Koss Olinger and is subject to Koss Olinger's supervision and control.

The following is a brief outline of the major areas of responsibility of the Chief Compliance Officer in Koss Olinger's supervisory structure. Please note that these items are not, nor are they intended to be, a complete representation of the Chief Compliance Officer's responsibilities. This list is provided only as a general reference tool.

- 1) Approval of Customer Accounts -The Chief Compliance Officer must review all account documentation to insure completion as well as the suitability of the proposed transaction relative to client needs, income, assets, risk tolerance and objectives.
- 2) Maintenance of Registered Representative Office Documentation - The Chief Compliance Officer shall maintain relevant files pertaining to all business conducted by any registered person under the supervision of the Chief Compliance Officer. Such files include customer files, transaction blotters, correspondence, advertising, sales memoranda, representative employment files, complaint files and cross-reference logs.
- 3) Processing of Sales/Transactions -The Chief Compliance Officer shall ensure that all transactions and supporting documentation are reviewed promptly. Additionally, the Chief Compliance Officer shall ensure that all checks and transactions are posted to appropriate internal records and copies maintained in the appropriate files.
- 4) Review of Client Accounts -The Chief Compliance Officer shall ensure that all customer accounts receive a periodic review in order to ensure that all activity is consistent with client suitability standards. The Chief Compliance Officer shall further maintain a record of said review.
- 5) Review of Representative Status -The Chief Compliance Officer shall periodically review the status of all registered personnel assigned to his supervision in order to insure that the representatives maintain the proper level of registration, state licensure and continuing education eligibility.
- 6) Annual Compliance Review -The Chief Compliance Officer shall ensure that all offices assigned to the Chief Compliance Officer are audited on at least an annual basis to confirm compliance with applicable state, federal, and FINRA regulations.