

# J. W. Coons Advisors, LLC

## Part 2A of Form ADV

### The Brochure

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

Updated: March 2011

This brochure provides information about the qualifications and business practices of J. W. Coons Advisors, LLC (“Coons Advisors”). If you have any questions about the contents of this brochure, please contact us at 614-459-4001. 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 Coons Advisors is also available on the SEC’s website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Material Changes

Coons Advisors' most recent update to Part 2 of Form ADV was made in March 2010. Coons Advisors' business activities have not changed materially since the time of that update. However, in 2010 the SEC required significant changes to the content and format of Part 2 of Form ADV. This brochure, which reflects those changes, is materially different from brochures used by Coons Advisors in prior years.

## Table of Contents

Material Changes.....	2
Table of Contents .....	2
Advisory Business .....	2
Fees and Compensation .....	3
Performance Based Fees and Side-by-Side Management .....	3
Types of Clients.....	3
Methods of Analysis, Investment Strategies and Risk of Loss .....	4
Disciplinary Information .....	5
Other Financial Industry Activities and Affiliations .....	5
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	5
Brokerage Practices .....	6
Review of Accounts .....	9
Client Referrals and Other Compensation.....	9
Custody .....	11
Investment Discretion.....	11
Voting Client Securities .....	11
Financial Information .....	12
Biographical Information for Keith M. Blankemeyer.....	14
Biographical Information for Douglas C. Brooks, CFP .....	15
Biographical Information for James W. Coons .....	16
Biographical Information for Robert J. Hoffman, CFA .....	17
Biographical Information for Anthony P. Lepore .....	18

## Advisory Business

Coons Advisors primarily provides customized investment management services to individuals, trusts, foundations and other legal entities. Coons Advisors generally invests client assets in individual stocks, bonds, exchange traded funds ("ETFs") and mutual funds.

Coons Advisors prepares a written Investment Policy Statement (IPS) for each client. Each client's IPS:

- describes that client's situation, risk profile, and objectives,
- explains the investment strategy that will be pursued,
- specifies permissible and impermissible investment securities and strategies, and
- identifies responsibilities of both Coons Advisors and the client.

Coons Advisors was founded in 2003 and is owned by James W. Coons, Robert H. Hoffman and Keith M. Blankemeyer. As of December 31, 2010 Coons Advisors managed approximately \$117.0 million and served approximately 41 clients.

## **Fees and Compensation**

Coons Advisors charges most of its clients an annual investment management fee based on the market value of assets under management according to the following schedule:

<u>Assets under management</u>	<u>Annual Fee</u>
First \$500 Thousand	1.25%
For the amount in excess of \$500 Thousand & up to \$1 Million	1.00%
For the amount in excess of \$1 Million & up to \$2 Million	0.75%
For the amount in excess of \$2 Million	0.50%

Coons Advisors has waived fees or negotiated fees below those in the schedule above for certain clients. Coons Advisors does not charge fees based on investment performance, except as the manager of the Foresight Fund, LLC.

Coons Advisors generally charges fees quarterly in advance based on the number of days in the quarter and the account value at the end of the prior quarter. Most clients authorize Coons Advisors to deduct fees automatically from their brokerage accounts, but clients may request that Coons Advisors send quarterly invoices to be paid by check.

For accounts opened in the middle of a quarter, the first fee is charged at the end of that quarter and includes the fee for that partial quarter, plus the full fee for the next quarter. The fee for the partial quarter is pro-rated based on the timing and size of transfers and deposits into the account.

If a client terminates the investment management agreement with Coons Advisors in the middle of a billing period, Coons Advisors will refund to the client an amount that is pro-rated based on the number of days that the account was managed during that period.

In addition to Coons Advisors' investment management fees, clients bear trading costs and might incur custodial fees. To the extent that clients' accounts are invested in mutual funds, ETFs or closed-end funds, clients bear additional costs associated with the management, trading and administration of those funds.

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

Coons Advisors charges performance fees only in connection with management for the Foresight Fund, LLC. Some investment advisers experience conflicts of interest in connection with the side-by-side management of accounts with different fee structures.

## **Types of Clients**

Coons Advisors primarily provides customized investment management services to high-net-worth individuals and associated trusts, estates, pension and profit sharing plans, and other legal entities.

Coons Advisors requests a relationship size of at least \$1 million for custom individual account management, and offers a partially-customized approach for relationships smaller than \$1 million and larger than \$200,000.

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

Coons Advisors' Chief Investment Officer, Robert J. Hoffman, oversees the investment process of the firm, including approval of all individual securities purchased in client accounts. Security analysis varies by the type of security. For stocks and bonds the analysis generally includes a review of:

- The issuer's management;
- The amount and volatility of past profits or losses;
- The issuer's assets and liabilities, as well as any material changes from historical norms;
- Prospects for the issuer's industry, as well as the issuer's competitive position within that industry; and
- Any other factors considered relevant.

For mutual funds, closed-end funds and ETFs the analysis generally includes a review of:

- The fund's management;
- The fund's historical risk and return characteristics;
- The fund's exposure to sectors and individual issuers;
- The fund's fee structure; and
- Any other factors considered relevant.

Coons Advisors' Investment Committee is led by Robert J. Hoffman, the Chief Investment Officer, and also includes Keith M. Blankemeyer, Douglas C. Brooks, James W. Coons and Anthony P. Lepore. The Investment Committee generally meets weekly to discuss developments and trends in the economy and financial markets, existing and prospective investments and individual portfolios. Investments are evaluated independently, as well as in the context of clients' existing holdings and sector exposures.

Coons Advisors generally intends to hold securities for relatively long time horizons, often for a year or more. However, market developments could cause Coons Advisors to sell securities sooner.

Depending on a client's investment objectives, Coons Advisors might engage in short selling or various options strategies. The use of short selling and option strategies poses risks that are discussed in detail with clients who are considering the use of these investment vehicles. Coons Advisors engages in short selling or option strategies only with explicit permission from clients.

All investing involves a risk of loss.

## **Disciplinary Information**

Coons Advisors and its employees have never been involved in any legal or disciplinary events that would be material to a client's evaluation of the company or its personnel.

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

Coons Advisors and its employees do not have any relationships or arrangements with other financial services companies that pose material conflicts of interest.

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

Coons Advisors has adopted a written code of ethics that is applicable to all part-owners and employees ("Covered Persons"). Among other things, the code requires Coons Advisors and its employees to act in clients' best interests, abide by all applicable regulations, avoid even the appearance of insider trading and pre-clear and report some types of personal securities transactions. Coons Advisors' restrictions on personal securities trading apply to part-owners and employees, as well as employees' family members living in the same household. A copy of Coons Advisors' code of ethics is available upon request by contacting Jim Coons, Chief Compliance Officer, at (614) 459-4001, [jcoons@coonsadvisors.com](mailto:jcoons@coonsadvisors.com), 1151 Bethel Road, Suite 204, Columbus, Ohio 43220.

Covered Persons are prohibited by Coons Advisors' Code of Ethics from:

- Timing the purchase or sale of a security in a personal account with the intent of benefiting from or avoiding adverse effects on the price of the security from transactions involving the same security in a client's account (also known as "front-running");
- Making purchase or sale transactions in a client's account with the intent of personal profit;
- Personally selling short a security in a client's account, except as part of a pair trade;
- Purchase securities in a private placement without prior written approval;
- Purchase or sell any security based on material, non-public information about that security or the market for that security;
- Personally acquire securities in an initial public offering without prior written approval; and
- The acceptance of anything of value, either directly or indirectly, from broker-dealers or other persons providing services to Coons Advisor except an occasional meal, ticket to an event, or a gift valued at \$100 or less.

Covered Persons are required to report to Coons Advisors' Chief Compliance Officer all personal securities holdings and transactions. In order to uphold the Code of Ethics, Covered Persons are prohibited from purchasing or selling, directly or indirectly, any reportable security knowing that it has been or will be purchased or sold in one or more client accounts on the same day. Covered Persons generally are permitted to participate in block trades, or orders that are grouped together, provided that they receive the average price that is applicable to clients and pay their share of any transaction costs. Covered Persons are not allowed to participate in partially filled orders until all clients' orders have been filled. The Chief Compliance Officer monitors employee trading, relative to client trading, in an attempt to guard against improper transactions.

## **Brokerage Practices**

Coons Advisors generally recommends that clients arrange for their assets to be held with TD Ameritrade Institutional ("TDAI"). Coons Advisors has managed client assets held at TDAI since June 2010, and has found it to offer good services at competitive prices.

### Soft Dollar Benefits

Coons Advisors receives certain products and services from TDAI free of charge or at discounted rates. These products and services include:

- The receipt of duplicate client confirmations, statements, and other account information;
- Direct advisory fee debiting capabilities;
- Access to an electronic network for order entry, including the simultaneous entry of trades on behalf of multiple client accounts;
- A portfolio management system and software that supports Coons Advisors' research processes.

Periodically TDAI will pay for Coons Advisors employees' travel, accommodation and related costs in connection with industry conferences. Mr. Coons, Chief Compliance Officer, is a member of the TDAI Advisor Panel, which is a group of advisors selected by TDAI to provide guidance and feedback on services provided by TDAI to advisors. TDAI pays travel, accommodation and related costs for Mr. Coons to participate in several meetings per year.

Coons Advisors does not believe that clients whose accounts are held by TDAI bear any additional costs in connection with Coons Advisors' receipt of products and services received by Coons Advisors from TDAI. Furthermore, TDAI's provision of these products and services is not contingent upon Coons Advisors formally committing any specific amount of business to TDAI. However, Coons Advisors would not receive these products and services if client accounts were not held in custody and traded by TDAI. Coons Advisors' receipt of these products and services creates a conflict of interest in connection with Coons Advisors' recommendation of TDAI. Also, some of the products and services listed above benefit clients whose accounts are held by other custodians, which could create a conflict of interest between the clients at TDAI, who are indirectly paying for the products and services, and the clients at other custodians who may benefit from the products and services.

### The Selection of Trading Counterparties

Coons Advisors can under certain circumstances place trades in accounts held at TDAI using other broker/dealers. However, TDAI charges clients trade-away fees that Coons Advisors believes outweigh any benefits from trading stocks, mutual funds, closed-end funds or ETFs with other brokers.

The availability and pricing of bonds varies more widely. As a result, prior to placing a bond trade, Coons Advisors:

- Calculates what it believes to be an appropriate price for the bond;
- When possible, examines bid and ask prices for that bond and/or similar bonds using Bloomberg or other resources that provide market prices; and
- In certain circumstances solicits bids from more than one broker/dealer.

Coons Advisors then executes the trade with the broker/dealer that offers sufficient liquidity and the most favorable pricing.

For clients who elect to have their accounts held by firms other than TDAI, Coons Advisors' approach generally is to trade stocks, mutual funds, closed-end funds and ETFs with the chosen custodian, and to trade bonds with the broker/dealer that offers sufficient liquidity and the most favorable pricing.

Some clients' accounts are relatively small, in which case the custodian may not allow Coons Advisors to trade through other firms. Other clients may specifically request that their accounts only be traded through a particular broker/dealer. Coons Advisors trades these accounts through the firm chosen by the client, which limits Coons Advisors' ability to seek best execution. Trading restrictions may result in materially higher trading costs and reduced returns.

### Best Execution Reviews

In determining brokers or dealers to be used, Coons Advisors seeks brokers or dealers who provide the best overall implementation. In evaluating implementation, Coons Advisors considers a number of factors including the following: the timeliness and accuracy of order handling, the ability of the broker to settle the trade promptly and correctly, the financial standing of the broker, Coons Advisors' past experience with similar trades, and other factors unique to a particular order. The evaluation takes into consideration research and other professional services which help Coons Advisors serve clients. Coons Advisors might recommend a broker that provides relevant research services and investment advisory assistance even though lower commissions may be charged by a broker that offers no such services and assistance.

Coons Advisors participates in the TD AMERITRADE Institutional program and predominantly uses TD AMERITRADE Institutional ("Custodian") for client brokerage transactions. TD AMERITRADE Institutional is a division of TD AMERITRADE, Inc. ("TD AMERITRADE") member FINRA/SIPC/NFA. TD AMERITRADE is an independent and unaffiliated SEC-registered broker-dealer and FINRA member. TD AMERITRADE offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Coons Advisors receives some benefits from TD AMERITRADE

through its participation in the program. Coons Advisors periodically reviews its brokerage relationships in fulfillment of its fiduciary duty to seek best execution.

Coons Advisors participates in TD AMERITRADE's institutional customer program and Coons Advisors may recommend TD AMERITRADE to clients for custody and brokerage services. There is no direct link between Coons Advisors' participation in the program and the investment advice it gives to its clients, although Coons Advisors receives economic benefits through its participation in the program that are typically not available to TD AMERITRADE retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Coons Advisors participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Coons Advisors by third party vendors. TD AMERITRADE may also have paid for business consulting and professional services received by Coons Advisors' related persons. Some of the products and services made available by TD AMERITRADE through the program may benefit Coons Advisors but may not benefit its client accounts. These products or services may assist Coons Advisors in managing and administering client accounts, including accounts not maintained at TD AMERITRADE. Other services made available by TD AMERITRADE are intended to help Coons Advisors manage and further develop its business enterprise. The benefits received by Coons Advisors or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD AMERITRADE. As part of its fiduciary duties to clients, the firm endeavors at all times to put the interests of its clients first. clients should be aware, however, that the receipt of economic benefits by Coons Advisors or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Coons Advisors' choice of TD AMERITRADE for custody and brokerage services.

**Coons Advisors also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment Advisors participating in the program. Specifically, the Additional Services include Morningstar Office.**

**TD Ameritrade provides the Additional Services to Advisor in its sole discretion and at its own expense, and Coons Advisors does not pay any fees to TD Ameritrade for the Additional Services. Coons Advisors and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services.**

**Coons Advisors' receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to Coons Advisors, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, Coons Advisors' client accounts maintained with TD Ameritrade. TD Ameritrade has the right to**



**terminate the Additional Services Addendum with Coons Advisors, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, Coons Advisors may have an incentive to recommend to its clients that the assets under management by Coons Advisors be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. Coons Advisors' receipt of Additional Services does not diminish its duty to act in the best interests of its clients, including to seek best execution of trades for client accounts.**

Coons Advisors' owners periodically evaluate the pricing and services offered by TDAI and other trading counterparties with those offered by other reputable firms. Coons Advisors has sought to make a good-faith determination that TDAI and other chosen trading counterparties provide clients with good services at competitive prices. However, clients should be aware that this determination could have been influenced by Coons Advisors' receipt of products and services from TDAI. Coons Advisors has concluded that TDAI is as good as, or better than, the other firms that have been considered. Coons Advisors would notify its clients if it were to determine that another firm offered better pricing and services than TDAI.

#### Aggregated Trades

Coons Advisors often aggregates client trades in an effort to execute trades efficiently and treat all clients fairly. Clients participating in a block, or grouped, order receive the same average price and incur trading costs that are the same as would be paid if they were trading individually. Employees of Coons Advisors may be included side-by-side in block client trades. If an order is partially filled, Coons Advisors allocates securities to clients' accounts in a manner that is deemed to be fair and appropriate under the circumstances. Coons Advisors seeks to complete unfilled client orders on the next trading day, depending on pricing and liquidity. Employees are excluded from receiving allocations from block trades that are only partially filled.

#### Client Referrals

Coons Advisors compensates TDAI for referring client accounts. See the "Client Referrals and Other Compensation" section below.

### **Review of Accounts**

Accounts under Coons Advisors' management are monitored on an ongoing basis by the Portfolio Manager and the Chief Compliance Officer. The Investment Committee reviews each account on at least an annual basis.

Clients receive account statements directly from their chosen custodian on at least a quarterly basis. Coons Advisors sends a quarterly investment letter and more detailed report and analysis of portfolios to clients each quarter.

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

Coons Advisors may receive client referrals from TD AMERITRADE through its participation in TD AMERITRADE AdvisorDirect (the "referral program"). In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, Advisor may have been selected to

participate in AdvisorDirect based on the amount and profitability to TD AMERITRADE of the assets in, and trades placed for, client accounts maintained with TD AMERITRADE. TD AMERITRADE is a discount broker-dealer independent of and unaffiliated with Coons Advisors and there is no employee or agency relationship between them. TD AMERITRADE has established the referral program as a means of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisors. TD AMERITRADE does not supervise Coons Advisors and has no responsibility for Coons Advisor's management of client portfolios or Coons Advisor's other advice or services. Coons Advisors pays TD AMERITRADE an on-going fee for each successful client referral. This fee is usually a percentage (not to exceed 25%) of the advisory fee that the client pays to Coons Advisors ("Solicitation Fee"). Coons Advisors will also pay TD AMERITRADE the Solicitation Fee on any advisory fees received by Coons Advisors from any of a referred client's family members, including a spouse, child or any other immediate family member who resides with the referred client and hired Coons Advisors on the recommendation of such referred client. Coons Advisors will not charge clients referred through AdvisorDirect any fees or costs higher than its standard fee schedule offered to its clients or otherwise pass Solicitation Fees paid to TD AMERITRADE to its clients. For information regarding additional or other fees paid directly or indirectly to TD AMERITRADE, please refer to the TD AMERITRADE AdvisorDirect Disclosure and Acknowledgement Form.

Coons Advisors' participation in AdvisorDirect raises potential conflicts of interest. TD AMERITRADE will most likely refer clients through AdvisorDirect to investment advisors that encourage their clients to custody their assets at TD AMERITRADE and whose client accounts are profitable to TD AMERITRADE. Consequently, in order to obtain client referrals from TD AMERITRADE, Coons Advisors may have an incentive to recommend to clients that the assets under management by Coons Advisors be held in custody with TD AMERITRADE and to place transactions for client accounts with TD AMERITRADE. In addition, Coons Advisors has agreed not to solicit clients referred to it through AdvisorDirect to transfer their accounts from TD AMERITRADE or to establish brokerage or custody accounts at other custodians, except when its fiduciary duties require doing so. Coons Advisors' participation in AdvisorDirect does not diminish its duty to seek best execution of trades for client accounts.

Coons Advisors has contracted with others, in addition to TD AMERITRADE, to serve as solicitors in Ohio for investment advisory services of Coons Advisors under Investment Advisors Act of 1940 Rules – (275.206(4)-3). Coons Advisors has agreed to pay to the solicitors a percentage of the investment advisory fees paid by clients referred to Coons Advisors by the solicitor for the term of the advisory relationships between referred clients and Coons Advisors. Payments to the solicitor are conditioned upon written consent and acknowledgement by referred clients and are authorized only thereby. Prospective clients referred by the solicitor are presented the same fee schedule as all other prospective clients of the same investment advisory service.

Other than the previously described products and services that Coons Advisors receives from TDAI, Coons Advisors does not receive any other economic benefits from non-clients in connection with the provision of investment advice to clients.

## **Custody**

All clients' accounts are held in custody by unaffiliated broker/dealers or banks, but Coons Advisors can access many clients' accounts through its ability to deduct advisory fees. In this sense, Coons Advisors is considered to have custody of client assets. Account custodians send statements directly to the account owners on at least a quarterly basis. Coons Advisors urges clients to carefully review these statements, and compare these statements to any account information provided by Coons Advisors.

## **Investment Discretion**

Coons Advisors has investment discretion over most clients' accounts. Clients grant Coons Advisors trading discretion through the execution of a limited power of attorney included in Coons Advisors' advisory contract.

Clients can place restrictions on Coons Advisors' investment discretion. For example, clients can ask Coons Advisors not to buy securities issued by companies in certain industries, or not to sell certain securities where the client has a particularly low tax basis, for example.

## **Voting Client Securities**

In accordance with its fiduciary duty to clients and Rule 206(4)-6 of the Investment Advisers Act, Coons Advisors has adopted and implemented written policies and procedures governing the voting of client securities. All proxies that Coons Advisors receives will be treated in accordance with these policies and procedures.

Coons Advisors considers the reputation, experience, and competence of a company's management and board of directors when it evaluates a prospective investment. In general, Coons Advisors votes in favor of routine corporate matters, such as the re-approval of an auditor or a change of a legal entity's name. Coons Advisors also generally votes in favor of compensation practices and other measures that are in-line with industry norms, that allow companies to attract and retain key employees and directors, that reward long-term performance, and that align the interests of management and shareholders.

Coons Advisors is not aware of any material conflicts of interest in connection with past proxy votes. Such a conflict could arise if, for example, a client was a senior executive with a publicly traded company and other clients held securities issued by that company. In the event that Coons Advisors becomes aware of a potential conflict, the Chairman of the Proxy Voting Committee will convene a meeting of the members to resolve the matter in accordance with Coons Advisors' Proxy Voting Procedures.

A copy of Coons Advisors' proxy voting policies and procedures, as well as specific information about how Coons Advisors has voted in the past, is available upon written request. Upon written request, clients can also take responsibility for voting their own proxies, or can give Coons Advisors instructions about how to vote their respective shares.

## **Financial Information**

Coons Advisors has never filed for bankruptcy and is not aware of any financial condition that is expected to affect its ability to manage client accounts.

# J. W. Coons Advisors, LLC

## Part 2B of Form ADV

### The Brochure Supplement

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

Updated: March 2011

This brochure supplement provides information about Keith M. Blankemeyer, Douglas C. Brooks, James W. Coons, Robert J. Hoffman and Anthony P. Lepore. It supplements Coons Advisors' accompanying Form ADV brochure. Please contact Coons Advisors' Chief Compliance Officer, James W. Coons, at 614-459-4001 if you have any questions about the Form ADV brochure or this supplement, or if you would like to request additional or updated copies of either document.

Additional information about Keith M. Blankemeyer, Douglas C. Brooks, James W. Coons, Robert J. Hoffman and Anthony P. Lepore is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Biographical Information for Keith M. Blankemeyer**

### Educational Background and Business Experience

Keith M. Blankemeyer was born in 1972. He earned a Bachelor of Arts Degree in History from the University of Toledo in 1999.

Mr. Blankemeyer has been a part-owner of Coons Advisors, Portfolio Manager and member of the Investment Committee since joining the firm in 2007. Mr. Blankemeyer previously founded Foresight Wealth Management, Inc. where he served as President and principal member. Earlier in his career he was director of operations for a private non-profit foundation, where his responsibilities included oversight of a large investment portfolio. Mr. Blankemeyer can be reached by telephone at 614-459-3255.

### Disciplinary Information

Mr. Blankemeyer has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Blankemeyer or of Coons Advisors.

### Other Business Activities

Mr. Blankemeyer is not engaged in any other investment related business, and does not receive compensation in connection with any business activity outside of Coons Advisors.

### Additional Compensation

Mr. Blankemeyer does not receive economic benefits from any person or entity other than Coons Advisors in connection with the provision of investment advice to clients.

### Supervision

As part-owner of Coons Advisors, Mr. Blankemeyer shares ultimate responsibility for the company's operations with the other part-owners, James W. Coons and Robert J. Hoffman. Mr. Blankemeyer discusses investment decisions with the other Investment Committee members, Douglas C. Brooks, James W. Coons, Robert J. Hoffman and Anthony P. Lepore. Operational decisions are discussed with Coons Advisors' other part-owners, James W. Coons and Robert J. Hoffman. Any of these individuals can be reached directly by calling the telephone number included with their biographical information.

## **Biographical Information for Douglas C. Brooks, CFP**

### Educational Background and Business Experience

Douglas C. Brooks was born in 1950. He received a Bachelor of Science Degree from The Ohio State University in 1972 and a Master of Arts Degree in Business Management from Central Michigan University in 1980. Douglas C. Brooks received the Certified Financial Planner (“CFP®”) designation in 1993. In order to become a CFP® professional, Douglas C. Brooks was required to pass a series of examinations, maintain membership with the CFP Institute and a local CFP chapter, and agree to abide by the CFP Institute’s Code of Ethics.

Douglas C. Brooks has served as Coons Advisors’ Senior Portfolio Manager and Member of the Investment Committee since joining the firm in 2010. Previously, Mr. Brooks served as Senior Vice President and Director of Portfolio Management for Huntington National Bank, where he worked during 1982-2010 and was a senior member of the Private Financial Group leadership team. Mr. Brooks can be reached by telephone at 614-459-4111.

### Disciplinary Information

Douglas C. Brooks has not been involved in any legal or disciplinary events that would be material to a client’s evaluation of Douglas C. Brooks or of Coons Advisors.

### Other Business Activities

Douglas C. Brooks is not engaged in any other investment related business, and does not receive compensation in connection with any business activity outside of Coons Advisors.

### Additional Compensation

Douglas C. Brooks does not receive economic benefits from any person or entity other than Coons Advisors in connection with the provision of investment advice to clients.

### Supervision

Douglas C. Brooks’ investment recommendations and activities are supervised by Coons Advisors’ owners, Keith M. Blankemeyer, James W. Coons and Robert J. Hoffman. Any of these individuals can be reached directly by calling the telephone number included with their biographical information.

## **Biographical Information for James W. Coons**

### Educational Background and Business Experience

James W. Coons was born in 1957. He received a Bachelor of Arts Degree in Economics and Mathematics in 1979 from DePauw University and a Masters Degree in Economics in 1980 from Ohio University. Mr. Coons graduated with Distinction from the Stonier Graduate School of Banking in 1990.

James W. Coons has been an owner/part-owner, Portfolio Manager and member of the Investment Committee since founding Coons Advisors in 2003. Previously, Mr. Coons served as Chief Economist for Huntington National Bank, where he worked during 1985-2003. Mr. Coons also served at various times as Director of Investor Relations, Director of Balance Management and head of the Investment Management Department at Huntington. Mr. Coons has taught Macroeconomics in the Executive MBA program of the Fisher College of Business at Ohio State University and Investment Management and Money and Banking at Capital University. Mr. Coons can be reached by telephone at 614-459-4001.

### Disciplinary Information

Mr. Coons has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Coons or of Coons Advisors.

### Other Business Activities

Mr. Coons is not engaged in any other investment related business, and does not receive compensation in connection with any business activity outside of Coons Advisors.

### Additional Compensation

Mr. Coons does not receive economic benefits from any person or entity other than Coons Advisors in connection with the provision of investment advice to clients.

### Supervision

As part-owner of Coons Advisors, Mr. Coons shares ultimate responsibility for the company's operations with the other part-owners, Keith M. Blankemeyer and Robert J. Hoffman. Mr. Coons discusses investment decisions with the other Investment Committee members, Keith M. Blankemeyer, Douglas C. Brooks, Robert J. Hoffman and Anthony P. Lepore. Operational decisions are discussed with Coons Advisors' other part-owners, Keith M. Blankemeyer and Robert J. Hoffman. Any of these individuals can be reached directly by calling the telephone number included with their biographical information.



## **Biographical Information for Robert J. Hoffman, CFA**

### Educational Background and Business Experience

Robert J. Hoffman was born in 1963. He received a Bachelor of Science Degree in Finance from the University of Illinois in 1985. Mr. Hoffman received the Chartered Financial Analyst (“CFA”) designation in 1998. In order to become a CFA Charterholder, Mr. Hoffman was required to pass a series of examinations, maintain membership with the CFA Institute and a local CFA chapter, and agree to abide by the CFA Institute’s Code of Ethics.

Mr. Hoffman has been a part-owner of Coons Advisors since 2005 and has served as Coons Advisors’ Chief Investment Officer since 2009. Previously, Mr. Hoffman was Senior Vice President for Huntington National Bank, where he worked during 1985-2005. At various times, he served as Director of Equity Research and Director of Balance Sheet Management. Mr. Hoffman can be reached by telephone at 614-459-4015.

### Disciplinary Information

Mr. Hoffman has not been involved in any legal or disciplinary events that would be material to a client’s evaluation of Mr. Coons or of Coons Advisors.

### Other Business Activities

Mr. Hoffman is not engaged in any other investment related business, and does not receive compensation in connection with any business activity outside of Coons Advisors.

### Additional Compensation

Mr. Hoffman does not receive economic benefits from any person or entity other than Coons Advisors in connection with the provision of investment advice to clients.

### Supervision

As part-owner of Coons Advisors, Mr. Hoffman shares ultimate responsibility for the company’s operations with other part-owners, Keith M. Blankemeyer and James W. Coons. Mr. Hoffman discusses investment decisions with the other Investment Committee members, Keith M. Blankemeyer, Douglas C. Brooks, James W. Coons and Anthony P. Lepore. Operational decisions are discussed with Coons Advisors’ other part-owners, Keith M. Blankemeyer and James W. Coons. Any of these individuals can be reached directly by calling the telephone number included with their biographical information.

## **Biographical Information for Anthony P. Lepore**

### Educational Background and Business Experience

Anthony P. Lepore was born in 1948. He received a Bachelor of Arts Degree in Finance from Xavier University in 1969.

Anthony P. Lepore has served as Coons Advisors' Region Director in Naples, Florida since joining in the company in 2011. Previously, Mr. Lepore was Florida Regional President for Huntington National Bank during 2004-2011. Prior to that, Mr. Lepore was Market President of Harris Bank in Naples, Florida. Mr. Lepore can be reached by telephone at 239-777-9875.

### Disciplinary Information

Anthony P. Lepore has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Anthony P. Lepore or of Coons Advisors.

### Other Business Activities

Anthony P. Lepore is not engaged in any other investment related business, and does not receive compensation in connection with any business activity outside of Coons Advisors.

### Additional Compensation

Anthony P. Lepore does not receive economic benefits from any person or entity other than Coons Advisors in connection with the provision of investment advice to clients.

### Supervision

Anthony P. Lepore's investment recommendations and activities are supervised by Coons Advisors' owners, Keith M. Blankemeyer, James W. Coons and Robert J. Hoffman. Any of these individuals can be reached directly by calling the telephone number included with their biographical information.