

J. W. Coons Advisors, LLC
Part 2A of Form ADV
The Brochure

www.coonsadvisors.com

March 2018

This brochure provides information about the qualifications and business practices of J. W. Coons Advisors, LLC (“Coons Advisors” or the “Firm”) located at 1151 Bethel Road, Suite 204, Columbus, OH 43220. If you have any questions about the contents of this brochure, please contact us at 614-918-3500. 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.

Material Changes

Coons Advisors' most recent update to Part 2 of Form ADV was made in March 2017. Coons Advisors' business activities have not changed materially since the time of that update.

Table of Contents

Material Changes.....	2
Table of Contents	2
Advisory Business	3
Fees and Compensation	3
Performance Based Fees and Side-by-Side Management	4
Types of Clients.....	4
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	10
Investment Discretion.....	10
Voting Client Securities	10
Financial Information	10

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, 2017, Coons Advisors managed approximately \$337.9 million in assets under management on a discretionary basis and \$49.2 million in assets under management on a non-discretionary basis, for a total of approximately \$387 million in assets under management.

Fees and Compensation

Coons Advisors charges most of its clients an investment management fee based on the average daily balance 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 negotiated fees below those in the schedule above for certain accounts.

For accounts established prior to 2015, Coons Advisors generally charges fees quarterly in advance based on the number of days in the billing period and the account value at the end of the prior billing period. For accounts opened in the middle of a billing period, the first fee is charged at the end of that billing period and includes the fee for that partial billing period, plus the full fee for the next billing period. The fee for the partial billing period is pro-rated based on the average daily balance for the billing period. 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.

For accounts established as of 2015, Coons Advisors generally charges fees monthly in arrears. The fee is based on the average daily balance of the respective account. For accounts opened in the middle of a billing period, the first fee is charged at the end of that billing period and is based on the average daily balance for the account. If a client terminates the investment management agreement with Coons Advisors in the middle of a billing period, Coons Advisors will bill the client for fees based on the number of days Coons Advisors managed the respective account. Going forward, Coons Advisors expects to convert all clients to this billing method.

Most clients authorize Coons Advisors to deduct fees automatically from their brokerage accounts, but clients may request that Coons Advisors send invoices to be paid by check.

In addition to Coons Advisors’ investment management fees, clients bear trading costs and might incur custodial and trust fees, where applicable. 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.

Valuations of securities for the purpose of establishing the total market value of the portfolio are obtained from our custodians and based on: (1) listed securities are valued on the basis of the last official traded sales price on the

valuation date, (2) over-the counter securities are valued at the NASDAQ official closing price on the valuation date, (3) fixed income securities are valued by third party pricing services provided by our custodian, and (4) if no market price is available, the value of the investment is determined by Coons Advisors at the estimated fair market value. For non-US securities, valuations are determined using the last official traded sales price converted to US Dollars at the last available exchange rate as of noon London-time on the valuation date.

Performance Based Fees and Side-by-Side Management

Coons Advisors does not charge performance-based fees to new clients. However, Coons Advisors has one legacy client whom is currently paying a performance fee. 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, retirement, 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 \$500,000.

Coons Advisors may also be engaged to provide retirement plan advisory services to assist sponsors of self-directed retirement plans with the selection and/or monitoring of investment alternatives (generally Exchange Traded Funds and open-end mutual funds) from which plan participants choose and self-direct the investments for their individual plan retirement accounts. In addition, to the extent requested by the plan sponsor, Coons Advisors shall provide participant education designed to assist participants in identifying the appropriate investment strategy for their retirement plan accounts. The terms and conditions of the engagement shall generally be set forth in a Retirement Plan Services Agreement between Coons Advisors and the plan sponsor.

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 includes Keith M. Blankemeyer, James W. Coons, P. Martina Cheung, John P. McCorkle and Frank W. Siegel. 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 participates in the Institutional advisor program (the "Program") offered by TD Ameritrade Institutional ("TDAI"). TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services that 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. (Please see the disclosure below in the "Brokerage Practices" and "Client Referrals and Other Compensation" sections.) Coons Advisors generally recommends that clients arrange for their assets to be held with TDAI.

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) 918-3500, 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;
- Purchasing securities in a private placement without prior written approval;
- Purchasing or selling any security based on material, non-public information about that security or the market for that security;
- Personally acquiring 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 Investment Officer monitors employee trading, relative to client trading, in an attempt to guard against improper transactions.

Brokerage Practices

As noted in the Other Financial Industry Activities and Affiliations section of this Form, Coons Advisors participates in TDAI's Program. TD Ameritrade offers to independent investment advisors services that 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. (Please see the disclosure below in the "Client Referrals and Other Compensation" section.) Coons Advisors generally recommends that clients arrange for their assets to be held with TDAI. Coons Advisors has managed client assets held at TDAI since June 2010 and has found it to offer good services at competitive prices.

Coons Advisors serves on the TDAI Trading Panel ("Panel"). The Panel consists of approximately ten independent registered investment advisers that advise TDAI on issues relevant to the independent adviser and their experience with TD Ameritrade's trading platform. The Panel meets in person once a year. Investment advisers are appointed to serve on the Panel for a one-year term by TDAI, sales, service and senior management. At times, Panel members are provided confidential information about TD Ameritrade initiatives. Panel members are required to sign a confidentiality agreement. TD Ameritrade does not compensate Panel members. However, TD Ameritrade may pay or reimburse Coons Advisors for the travel, lodging and meal expenses incurred in attending Panel meetings. The benefits received by Coons Advisors or its personnel by serving on the Panel do not depend on the amount of brokerage transactions directed to TD Ameritrade. 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 Coons Advisors' recommendation of TD Ameritrade for custody and brokerage services.

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 system that delivers data, news and analytics that supports Coons Advisors' research processes.

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. 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 partial payment of a Bloomberg subscription.

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 respective Portfolio Manager, the Chief Investment Officer 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 and/or meets in-person with clients at the time and place of their choosing.

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. For referrals that occurred through AdvisorDirect before April 10, 2017, this fee is a percentage (not to exceed 25%) of the advisory fee that the client pays to Coons Advisors ("Solicitation Fee"). For referrals that occurred through AdvisorDirect on or after June 9, 2017; the Solicitation Fee is an annualized fee based on the amount of referred client assets that does not exceed 25% of 1%, unless such client assets are subject to a Special Services Addendum. In the case of a Special Services Addendum, the Solicitation Fee is an annualized fee based on the amount of referred client assets that does not exceed 10% of 1%. Coons Advisors will also pay TD Ameritrade the Solicitation Fee on any assets 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.

As disclosed above in the "Brokerage Practices" section, Coons Advisors participates in TD Ameritrade's Institutional Advisor program and 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 advisor 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 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, Coons Advisors 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 Coons Advisors' choice of TD Ameritrade for custody and brokerage services.

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.

From time to time, Coons Advisors has referral fee arrangements with solicitors who introduce clients to the Firm. Any solicitor is required to provide prospective clients with a copy of this document (The Brochure) and a separate disclosure statement. Clients referred by a solicitor to Coons Advisors do not pay a higher fee as a result of the referral.

Custody

All clients' accounts are held in custody by unaffiliated broker/dealers, trust companies 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

Coons Advisors does not vote proxies.

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.