

PART 2A APPENDIX 1 OF FORM ADV WRAP FEE BROCHURE

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June 14, 2017

This wrap fee program brochure provides information about the qualifications and business practices of MKD Wealth Coaches, LLC. If you have any questions about the contents of this brochure, please contact us at (248) 418-5100 or Lori T. Williams, our Chief Compliance Officer, at lori@mkdwealthcoach.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.

We are a registered investment adviser. Registration of an adviser does not imply any level of skill or training.

Additional information about us also is available on the SEC's website at www.adviserinfo.sec.gov.

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ITEM 4: SERVICES, FEES AND COMPENSATION

Our Services

The purpose of this Brochure is to describe the wrap fee program we provide under our proprietary investment management service that we call **MKD Wealth Strategies**. A wrap fee program is an investment program where you would pay us, as the sponsor of the program, a single fee which covers the costs of investment management, brokerage, custody and any other services provided under the program. **MKD Wealth Strategies** provides clients with execution, clearing, and custodial services, through Fidelity Management Trust Company. **MKD Wealth Strategies** program fees, minimum account requirements and additional information about our firm are described in more detail below.

We offer the following strategies within our **MKD Wealth Strategies**:

- RIS[®] Short Term Income Instruments
- RIS[®] Tax-Managed Income Strategy
- RIS[®] Market Strategy
- RIS[®] Sectors Strategy
- Tactical Strategy
- Hard Assets Strategy
- Portfolio Diversifier Strategy
- Passive (which includes Capital Asset Builder, All Weather, and Northstar).

The “**RIS[®]**” strategies use a protect and advance philosophy designed to respond to changing markets with a sell side discipline. We use technical and fundamental factors to maintain a focus on short-term, intermediate-term and long-term market direction. Our decisions are based on a disciplined, trend-following approach to rationally view the cyclical nature, patterns of returns and volatility of the financial markets.

a. The “**RIS[®] Short-Term Income Instruments**” Strategy seeks to provide an income level higher than current money market rates, with a lower volatility than U.S. 1 to 3 year Treasury obligations.

b. The “**RIS[®] Tax-Managed Income**” Strategy invests primarily in state and municipal income tax-free bond obligations and looks to protect capital during periods of uncertainty when compared to the Barclay Municipal Bond Index, utilizing a trend-following approach.

c. The “**RIS® Market**” Strategy is a longer term, lower activity, model whose goal is to be invested in global equities during Bull markets, and in cash and/or fixed income during Bear markets.

d. The “**RIS® Sectors**” Strategy utilizes a two-factor market strength assessment to go “long” with the U.S. sectors which are expected to outperform, while simultaneously “shorting” the sectors expected to underperform.

e. The “**Tactical**” Strategy seeks to achieve capital appreciation through a globally diversified portfolio of equity, fixed income, alternatives, and commodities, and is premised on the principal that asset allocation and adjusting the tactical underweighting and overweighting are the primary drivers of returns.

f. The “**Hard Assets**” Strategy provides a broadly diversified commodity exposure through investments in ETF’s, Mutual Funds, and individual stocks allocated in a core/satellite fashion. (e.g. using 2 diversified commodity indices as core positions, surrounded by specific exposures to steel, coal, gold miners, silver, etc., as satellites).

g. The “**Portfolio Diversifier**” Strategy seeks to diversify traditional asset allocation utilizing liquid alternative strategies (e.g. Long/Short, Event Driven, Market Neutral, Global Macro, Managed Futures).

h. The “**Passive Strategies**” include all of the following strategies:

- i. “**Capital Asset Builder**,” which utilizes a globally diversified portfolio comprised of equities, fixed income, and commodities modeled on a passive approach and is rebalanced once a year.
- ii. “**All Weather**,” which is based on the risk parity philosophy. Its allocations are weighted among equities, fixed income, and commodities to equalize the risk exposure among each asset class.
- iii. “**Northstar**” utilizes the strategic asset allocation approach of a globally diversified portfolio of equity, fixed income, alternatives, and commodities modeled on a passive approach in which the strategic weightings are rebalanced once a year.

If you choose to participate in **MKD Wealth Strategies**, you will sign a Discretionary Investment Advisory Agreement with us which establishes the general terms and conditions of our engagement. We discuss your financial needs, financial goals and objectives, risk tolerance and other individual circumstances with you to determine which strategy will meet your investment objectives. Under our agreement, you grant us the ability to determine, without obtaining your specific consent, the securities to be bought or sold for your account(s) and the amount of

securities to be bought or sold. However, we exercise such discretion in a manner consistent with your stated investment objectives for the account and by considering the size of your account and your risk tolerance. Also, you may impose reasonable restrictions, in writing, on our discretionary authority or place limitations on the types of investments for your account. You must notify us promptly if there are ever any changes in your financial situation or investment objectives or if you wish to impose any reasonable restrictions upon our management services.

Our Fees

Our general annual fee schedules for our Wrap Fee Program are noted as follows:

<u>Investment Strategy Groups:</u>	<u>Fee Tiers</u>				
	<u>\$0-1m</u>	<u>\$1-2m</u>	<u>\$2-5m</u>	<u>\$5-10m</u>	<u>\$10m+</u>
	First \$1m	Next \$1m	Next \$3m	Next \$5m	
RIS [®] Short Term Income Instruments	0.65%	0.45%	0.35%	0.25%	0.15%
MKD Wealth Strategies ¹	1.95%	1.50%	1.25%	0.45%	0.35%
Passive Strategies ²	1.00%	0.80%	0.60%	0.25%	0.20%

¹Includes: RIS[®] Tax Managed Income (TMI), RIS[®] Market, RIS[®] Sectors, Tactical, Hard Assets, and Portfolio Diversifier

²Includes: Capital Asset Builder, All Weather, Northstar

We charge our fee quarterly, in advance, based upon a percentage of the market value of the assets in your account(s) under our management on the last day of the preceding quarter. Our fee includes brokerage commissions, transaction fees, and other related costs and expenses. We prorate the fee for your initial quarter starting the day your assets are designated for our management. Our fee varies depending upon the investment strategy and market value of the assets under management.

Cash and short-term income instruments held inside of an MKD Wealth Strategy are billed at the **MKD Wealth Strategies** Fee. Passive Strategies, and RIS[®] Short Term Instruments are billed at their respective strategies rate. The fee schedule breakpoints apply to the amount in each strategy group. Assets in different strategy groups are not aggregated to determine fees. We may, in our sole discretion, negotiate to charge a lesser management fee based upon certain

criteria, such as client longevity, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, or pro bono activities.

You may make additions to and withdrawals from your account at any time. Additions may be in cash or securities provided that we reserve the right to liquidate any transferred securities, or decline to accept particular securities into your account. Generally, we prorate our fees for each capital contribution of \$50,000 or more made during the applicable calendar quarter. If you deposit assets into an account during the last week of the quarter, we will waive the adjustment. You may withdraw assets from your account by contacting us and we will provide the appropriate paperwork required by the custodian to initiate a withdrawal. Any withdrawal is subject to the custodian's usual and customary securities settlement procedures.

We design our portfolios as long-term investments and asset withdrawals may impair the achievement of your investment objectives. We may consult with you about your options and ramifications of transferring securities. You should be aware that when transferred securities are liquidated, you may incur transaction fees, fees assessed at the mutual fund level (i.e., contingent deferred sales charge) and/or taxes. You are responsible for any transaction costs or fees, or taxes due in connection with the liquidation of investment positions to facilitate cash or asset withdrawals.

Direct Billing

Generally, you authorize us in the Discretionary Investment Advisory Agreement to invoice your custodian directly for our fees and to direct your custodian to deduct our fees from your account. You will receive periodic statements from your custodian showing all amounts disbursed from the account, including our fee. You may withdraw this authorization for direct billing of our fee at any time by notifying us or your custodian in writing.

Fee Comparison

Our fee includes such services as portfolio management (stock, bond and mutual fund analysis, market analysis, asset allocation decisions, etc.), execution of various securities (mutual funds, ETFs stocks, bonds, etc.), the custodian's monthly reports, account servicing, and continuous account management. Participation in **MKD Wealth Strategies** may cost you more or less than purchasing these services separately. The portfolio size and amount, number of transactions made in your account, as well as the commissions charged for each transaction, will determine the relative cost of **MKD Wealth Strategies** versus paying for executions on a per transaction basis and paying a separate fee for advisory services. Our fee may be higher or lower than fees charged by other sponsors of comparable investment advisory programs.

Other Fee and Charges

In addition to our fee, you may incur other fees and charges imposed by third-parties, including, but are not limited to, fees charged by your custodian, fund management and other fees imposed directly by a mutual fund purchased in your account as disclosed in the fund's prospectus, certain deferred sales charges on previously purchased mutual funds, transfer taxes, wire transfer and electronic fund fees, check writing fees, SEC expenses on securities transactions, custodial termination fees, and other fees and taxes on brokerage accounts and securities transactions.

Aggregation of Orders

We may aggregate orders for securities transactions such that all of our client accounts invested in accordance with the same MKD Wealth Strategy will be traded in a block trade. In doing so, we strive to treat each of our clients fairly and will not favor one of our clients over another. Each account that participates in an aggregated order will participate at the average share price for all transactions ordered by us in that security on a given business day. If an aggregated order is not filled in its entirety, it may be allocated among participating accounts on a pro rata basis. However, if the partial fill is determined to be inappropriate for an account such that the number of shares for a particular account would be too few to warrant the investment (or result in partial shares), then the shares will not be allocated to that account.

We will not aggregate orders for a client having a directed brokerage relationship with a client who does not have a directed brokerage relationship with the same broker-dealer. A consequence of not aggregating your order with other orders for the same securities is that you may not obtain as good a price or as low a cost in a separate transaction as clients whose orders have been aggregated.

We have the responsibility to effect orders correctly, promptly and in the best interests of our clients. In the event any error occurs in the handling of any client transactions, due to our actions or inaction, our policy is to seek to identify and correct any errors as promptly as possible without disadvantaging the client or benefiting us in any way. If the error is our responsibility, any client transaction will be corrected and we will be responsible for any client loss resulting from an inaccurate or erroneous order. If a gain results from the trade error, it is paid to a charity on file with our Custodian.

Termination

Our agreement with you continues until one of us terminates the agreement by providing the other party with thirty (30) days written notice. We prorate our fees through the date of termination and we charge or refund you any outstanding balance, as appropriate, in a timely manner.

ITEM 5: ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

Account Requirements

To open accounts with us, we require you to place a minimum of \$500,000 of assets in your aggregate portfolios under our management. We also impose certain conditions for opening and maintaining an account in **MKD Wealth Strategies**. Our minimum account sizes are:

Strategy	Minimum Account Size
Tax Managed Income	No minimum
RIS [®] Short Term Income Instruments, Capital Asset Builder, and All Weather	\$ 2,500
RIS [®] Market, Hard Assets, Portfolio Diversifier, RIS [®] Sectors, and Northstar	\$25,000
Tactical	\$50,000

We may waive this requirement if, for example, you have additional or related accounts that together exceed the minimum requirements.

We do not charge a minimum annual fee for any of our **MKD Wealth Strategies**.

Types of Clients

We provide services to individuals, corporate pension and profit-sharing plans, trusts, estates, charitable institutions, and other corporations and business entities.

ITEM 6: PORTFOLIO MANAGER SELECTION AND EVALUATION

Advisory Business

We are the portfolio manager for all accounts in the **MKD Wealth Strategies** program. We also offer financial planning as well as investment management regarding annuity products, individual bonds and/or cash and equivalents that you may own or your individual employer-sponsored retirement plans may own. We offer our services on a fee basis, and depending on the type of service, we charge an asset based fee, hourly rate or fixed fee. For additional information

regarding these services and our fees, you may request a copy of the Part 2A of our Form ADV by contacting Lori T. Williams, our Chief Compliance Officer, at (248) 418-5100 or lori@mkdwealthcoach.com.

Performance-Based Fees and Side-By-Side Management

We do not charge you any performance-based fees, which are fees based on a share of capital gains on or capital appreciation of your assets.

Methods of Analysis, Investment Strategies and Risk of Loss

Method of Analysis

In executing our investment management process, we create various model strategies. Clients with similar investment objectives and risk tolerances may receive substantially identical portfolio recommendations, depending upon each client's circumstances. We have engaged third-party consultants to provide us with investment research and analysis. Based on the investment analysis, the third-party consultants will recommend changes to our investment strategies. We will continue to determine which strategy is appropriate for our clients. The third-party consultants do not provide individualized client investment management but rather provides portfolio design, asset allocation, and securities selection for our investment strategies. We will continue to have discretion over all trading decisions in the management of our strategies.

We believe these resources for information are reliable and regularly depend on these resources for making our investment decisions; however, we are not responsible for the accuracy or completeness of this information. At least annually, we will evaluate the services provided by the third-party consultants.

One of our third-party consultants who provides us with investment research and analysis has a less than 1% ownership interest in a company which manufactures various investment funds which we may utilize as part of our investment models. As a result, that third-party consultant has an economic incentive to recommend those investment funds to clients (such as our firm) as the consultant indirectly receives fees charged by those funds through its equity ownership interest in the company. We have mitigated this conflict by having other strategies available for clients to invest in. Additionally, the investment funds manufactured by the issuer represent a small percentage of our overall portfolio strategies.

Investment Strategies

We use a variety of investment strategies depending on your circumstances and needs. We may recommend implementing one or more of the following investment strategies: long-term purchases (held at least a year), short term purchases (held less than a year), trading (held less than thirty (30) days), margin transactions (purchase of a security on credit extended by a securities company), and option writing (selling an option).

We may recommend implementing these strategies using stocks, bonds, mutual funds (held directly or held within variable annuities, life insurance products, or employer retirement plans), exchange traded funds, municipal securities, options contracts, futures contracts and other types of investments. We often recommend mutual funds and exchange traded funds of different kinds to promote portfolio diversification within various asset classes, such as industry sectors, domestic/international, or equities/bonds. We may recommend periodic purchases, sales, and exchanges of those mutual fund shares and/or exchange traded funds when there are changes in your financial needs, market conditions, or economic developments.

Model Portfolios

Based upon the client's stated investment objectives, MKD Wealth Coaches' investment management focuses on the use of diversified models utilizing Global Multi Asset Portfolios (conservative, balanced, and growth), known as "Tactical" Strategies, as the core model.

Margin Leverage

Although MKD Wealth Coaches, as a general business practice, does not utilize leverage, there may be instances in which exchange-traded funds, other separate account managers and, in very limited circumstances, MKD Wealth Coaches will utilize leverage. In this regard please review the following:

The use of margin leverage enhances the overall risk of investment gain and loss to the client's investment portfolio. For example, investors are able to control \$2 of a security for \$1. So, if the price of a security rises by \$1, the investor earns a 100% return on their investment. Conversely, if the security declines by \$.50, then the investor loses 50% of their investment.

The use of margin leverage entails borrowing, which results in additional interest costs to the investor.

Broker-dealers who carry customer accounts require a minimum equity requirement when clients utilize margin leverage. The minimum equity requirement is stated as a percentage of the value of the underlying collateral security with an absolute minimum dollar requirement. For example, if the price of a security declines in value to the point where the excess equity used to satisfy the minimum requirement dissipates, the broker-dealer will require the client to deposit

additional collateral to the account in the form of cash or marketable securities. A deposit of securities to the account will require a larger deposit, as the security being deposited is included in the computation of the minimum equity requirement. In addition, when leverage is utilized and the client needs to withdraw cash, the client must sell a disproportionate amount of collateral securities to release enough cash to satisfy the withdrawal amount based upon similar reasoning as cited above.

Regulations concerning the use of margin leverage are established by the Federal Reserve Board and vary if the client's account is held at a broker-dealer versus a bank custodian. Broker-dealers and bank custodians may apply more stringent rules as they deem necessary.

Short-Term Trading

Although MKD Wealth Coaches, as a general business practice, does not utilize short-term trading, there may be instances in which short-term trading may be necessary or an appropriate strategy. In this regard, please read the following:

There is an inherent risk for clients who trade frequently in that high-frequency trading creates substantial transaction costs that in the aggregate could negatively impact account performance. However, MKD Wealth Coaches pays these transaction costs for its clients in the Wrap Fee Program.

Security-Specific Material Risks

There is an inherent risk for clients who have their investment portfolios heavily weighted in one security, one industry or industry sector, one geographic location, one investment manager, one type of investment instrument (equities versus fixed income). Clients who have diversified portfolios, as a general rule, incur less volatility and therefore less fluctuation in portfolio value than those who have concentrated holdings. Concentrated holdings may offer the potential for higher gain, but also offer the potential for significant loss.

Types of Investments and Risk of Loss

You should be prepared to bear the risk of loss when you invest in securities. Obtaining higher rates of return on investments typically entails accepting higher levels of risk. We will work with you to attempt to identify the balance of risks and rewards that is appropriate and comfortable for you. However, it is still your responsibility to ask questions if you do not understand fully the risks associated with any investment or investment strategy.

Also, while we strive to render our best judgment on your behalf, many economic and market variables beyond our control can affect the performance of your investments and we cannot assure you that your investments will be profitable or that no losses will occur in your investment portfolio. Past performance is one consideration with respect to any investment or investment advisor, but it is not a predictor of future performance.

We offer advice about a wide variety of investment types, including mutual funds, index funds, ETFs, corporate debt, government and municipal securities, fixed and variable annuities, option contracts on securities, futures, and interests in partnerships investing in real estate and oil and gas investments, each having different types and levels of risk. We will discuss these risks with you in determining the investment objectives that will guide our investment advice for your account. We will explain and answer any questions you have about these kinds of investments, which present special considerations such as the following.

Mutual Funds, Index Funds and Exchange Traded Funds

Mutual funds and ETFs typically charge their shareholders various advisory fees and expenses associated with the establishment and operation of the funds. These fees will generally include a management fee, shareholder servicing, other fund expenses, and sometimes a distribution fee. If the fund also imposes sales charges, you may pay an initial or deferred sales charge. These separate fees and expenses are disclosed in each fund's current prospectus, which is available from the fund or we can provide it to you upon request.

Consequently, for any type of fund investment, it is important for you to understand that you are paying two levels of advisory fees and expenses: one layer of fees and expenses is paid at the fund level and one layer of advisory fees is paid to us. Also, we primarily recommend "no-load" mutual funds, which do not have a commission or sales charge because the shares are distributed directly by the investment company, instead of going through a secondary party. Generally speaking, most mutual funds may be purchased directly, without using our services and without incurring our advisory fees.

MKD Wealth Coaches may invest in open-end mutual funds and exchange-traded funds for the vast majority of its clients. However, for certain clients, MKD Wealth Coaches may effect transactions in the following types of securities:

a. **Equity Securities:** Investing in individual companies involves inherent risk. The major risks relate to the company's capitalization, quality of the company's management, quality and cost of the company's services, the company's ability to manage costs, efficiencies in the manufacturing or service delivery process, management of litigation risk, and the company's ability to create shareholder value (i.e., increase the value of the company's stock price). Foreign securities, in addition to the general risks of equity securities, have geopolitical risk, financial

transparency risk, currency risk, regulatory risk and liquidity risk.

b. **Mutual Fund Securities:** Investing in mutual funds carries inherent risk. The major risks of investing in a mutual fund include the quality and experience of the portfolio management team and its ability to create fund value by investing in securities that have positive growth, the amount of individual company diversification, the type and amount of industry diversification, and the type and amount of sector diversification within specific industries. In addition, mutual funds tend to be tax inefficient and therefore investors may pay capital gains taxes on fund investments while not having yet sold the fund.

a. **Exchange-Traded Funds (“ETFs”):** ETFs are investment companies whose shares are bought and sold on a securities exchange. An ETF holds a portfolio of securities designed to track a particular market segment or index. Some examples of ETFs are SPDRs[®], streetTRACKS[®], DIAMONDSSM, NASDAQ 100 Index Tracking StockSM (“QQQsSM”) iShares[®] and VIPERs[®]. The funds could purchase an ETF to gain exposure to a portion of the U.S. or foreign market. The funds, as a shareholder of another investment company, will bear their pro-rata portion of the other investment company’s advisory fee and other expenses, in addition to their own expenses. Investing in ETFs involves risk. Specifically, ETFs, depending on the underlying portfolio and its size, can have wide price (bid and ask) spreads, thus diluting or negating any upward price movement of the ETF or enhancing any downward price movement. Also, ETFs require more frequent portfolio reporting by regulators and are thereby more susceptible to actions by hedge funds that could have a negative impact on the price of the ETF. Certain ETFs may employ leverage, which creates additional volatility and price risk depending on the amount of leverage utilized, the collateral and the liquidity of the supporting collateral.

Further, the use of leverage (i.e., employing the use of margin) generally results in additional interest costs to the ETF. Certain ETFs are highly leveraged and therefore have additional volatility and liquidity risk. Volatility and liquidity can severely and negatively impact the price of the ETF’s underlying portfolio securities, thereby causing significant price fluctuations of the ETF.

b. **Fixed Income Securities:** Fixed Income Securities carry additional risks than those of equity securities described above. These risks include the company’s ability to retire its debt at maturity, the current interest rate environment, the coupon interest rate promised to bondholders, legal constraints, jurisdictional risk (U.S or foreign) and currency risk. If bonds have maturities of ten years or greater, they will likely have greater price swings when interest rates move up or down. The shorter the maturity the less volatile the price swings. Foreign bonds

have liquidity and currency risk.

c. **Commercial Paper and Certificates of Deposit:** Commercial Paper and Certificates of Deposit are generally considered safe instruments, although they are subject to the level of general interest rates, the credit quality of the issuing bank and the length of maturity. With respect to certificates of deposit, depending on the length of maturity there can be prepayment penalties if the client needs to convert the certificate of deposit to cash prior to maturity.

f. **Municipal Securities:** Municipal Securities carry additional risks than those of corporate and bank-sponsored debt securities described above. These risks include the municipality's ability to raise additional tax revenue or other revenue (in the event the bonds are revenue bonds) to pay interest on its debt and to retire its debt at maturity. Municipal bonds are generally tax free at the federal level, but may be taxable in Individual states other than the state in which both the investor and municipal issuer are domiciled.

g. **U.S. Government Securities:** U.S. Government Securities include securities issued by the U.S. Treasury and by U.S. Government agencies and instrumentalities. U.S. Government securities may be supported by the full faith and credit of the United States.

h. **Corporate Debt Obligations:** Corporate debt obligations include corporate bonds, debentures, notes, commercial paper and other similar corporate debt instruments. Companies use these instruments to borrow money from investors. The issuer pays the investor a fixed or variable rate of interest and must repay the amount borrowed at maturity. Commercial paper (short-term unsecured promissory notes) is issued by companies to finance their current obligations and normally has a maturity of less than nine months. In addition, the firm may also invest in corporate debt securities registered and sold in the United States by foreign issuers (Yankee bonds) and those sold outside the U.S. by foreign or U.S. issuers (Eurobonds).

Voting Client Securities

As a matter of firm policy and practice, we will not be responsible for responding to proxies that are solicited with respect to annual or special meetings of shareholders of securities held in your account. Proxy solicitation materials will be forwarded to you for response and voting.

ITEM 7: CLIENT CONTACT WITH PORTFOLIO MANAGERS

We are open Monday through Friday from 8:30 a.m. to 5 p.m. There are no restrictions on when you may contact or consult with us or our investment adviser representatives regarding MKD Wealth Strategies or your account.

ITEM 8: CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

As portfolio managers, our employees may have access to the information the client provides to us, including information regarding the client's financial information. Our firm has adopted a Privacy Policy, in accordance with Regulation S-P under section 504 of the Gramm-Leach-Bliley Act, which restricts the firm and our employees' use of and access to our clients' nonpublic personal information. Our employees only have access to client information on an "as needed" basis in order to service our **MKD Wealth Strategies** clients. In order for us and our investment adviser representatives to effectively manage your account and assist you in meeting your financial objectives, you must update us as soon as possible when any changes to their personal or financial information occur.

We recognize and appreciate the importance of protecting your privacy, so we established policies to safeguard your confidential information that we obtain in connection with **MKD Wealth Strategies**. We provide you a copy of our privacy policy notice before or at the same time that we sign the Discretionary Investment Advisory Agreement with you. You may obtain a complete copy of our Privacy Policy by contacting Lori T. Williams, our Chief Compliance Officer, at (248) 418-5100 or lori@mkdwealthcoach.com.

ITEM 9: ADDITIONAL INFORMATION

Disciplinary Information

As a registered investment adviser, we must inform you of all material facts regarding any legal or disciplinary events that would be material to your evaluation of our firm or the integrity of our management. We have no legal or disciplinary events to disclose.

Other Financial Industry Activities and Affiliations

We are a licensed insurance agency. Many of our Wealth Coaches, in their individual capacities, are licensed insurance agents and may recommend the purchase of certain insurance products. A conflict of interest exists to the extent that we recommend the purchase of insurance products where our Wealth Coaches earn insurance commissions or other additional

compensation. However, to mitigate this conflict, if you decide to implement our recommendation to purchase insurance products you are not required to purchase insurance through our Wealth Coaches and you may purchase insurance products through another insurance agency of your choice.

Mr. Dankovich is a licensed practicing attorney who maintains a limited legal practice, separate and distinct from our firm. No portion of our services to you constitutes legal advice. Rather, you should consult with and seek the advice of your own attorney.

Our Chief Compliance Officer, Lori T. Williams, is also a licensed attorney and founder of Your Legal Resource PLLC, a Michigan professional limited liability company that provides referrals to clients in need of legal advice or representation by an attorney. We may recommend Your Legal Resource to our clients. There is no additional cost to the client for a referral to an attorney. However, this may create a conflict of interest since Ms. Williams' firm is compensated by the attorney if they are engaged by our client. We mitigated this conflict by not requiring you to work with Your Legal Resource.

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

We have adopted a code of ethics establishing standards of conduct for our firm and the persons associated with us which we call associated persons. Our code requires that our associated persons comply with applicable securities laws. In accordance with Section 204A of the Advisers Act, our code contains written policies reasonably designed to prevent the unlawful use of material non-public information by us or any of our associated persons. Our Code also requires that certain of our personnel who have access to confidential client information report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings.

Our associated persons may buy or sell securities for our own accounts, otherwise known as proprietary accounts, that we also recommend to you and other clients consistent with our policies and procedures. There may be many similarities in portfolio holdings among these proprietary accounts and your accounts. While this may create a conflict of interest, generally, orders for your account and our proprietary accounts are aggregated or "batched" into one large order in accordance with our trade aggregation and allocation policy described in more detail in the "**Aggregation of Orders**" section above on page 4. Aggregated orders may achieve better execution for all participating accounts and we fairly allocate those benefits among all participating accounts, which mitigates any potential conflict.

Also, when we are purchasing or selling or considering for purchase or sale any security on behalf of a client that is not part of an aggregated order, an access person cannot purchase or

sell that same security before we complete purchase or until a decision has been made not to purchase or sell such security for our clients. These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

You may request a copy of our code by contacting Lori T. Williams, our Chief Compliance Officer, at (248) 418-5100 or lori@mkdwealthcoach.com.

Review of Accounts

Our investment committee meets on a regular basis to review and make investment recommendations for our RIS[®] Strategies and other strategies. Whenever the committee deems it necessary or appropriate, we will make investment changes to your account. As described in "METHODS OF ANALYSIS" on page 7, we utilize third party consultants to monitor the investments held within our strategies.

If you are an investment management client, we monitor your investments in your accounts on an ongoing basis. To assist us in reviewing your account we use various reporting tools to 1) identify if your account is not properly aligned with your investment strategy 2) determine if the growth/loss in your account during the quarter requires us to rebalance your holdings back to the strategy allocation and 3) review your cash position to determine if it is within the pre-determined risk range. In addition, we conduct regular account reviews at least annually.

We encourage you to discuss your financial needs, goals and objectives with us and to keep us informed of any changes. We contact you at least annually to review our previous services and make any necessary recommendations, as well as discuss the impact resulting from any changes in your financial situation and investment objectives.

You will receive confirmations of your purchases and sales and statements from your broker-dealer or custodian containing account information such as account value, transactions, and other relevant account information.

Client Referrals and Compensation

We must disclose any economic benefits we or our investment advisory representatives receive for providing investment advice and other services to you. As described in the “**Other Financial Industry Activities and Affiliations**” section beginning on page 13, as a licensed insurance agency, we may receive commissions when our Wealth Coaches sell insurance products to you. As we described above, while this may create a conflict of interest, we mitigate this conflict by not requiring you to purchase such insurance products through our affiliated agencies or Wealth Coaches, and you may purchase the products from another insurance agency of your choice.

In previous years, we sponsored an annual all-day golf outing. We may or may not sponsor the event again. When we offer the event, we invite current clients and Center-of-Influence individuals to be team captains and to invite three potential prospects who have not yet met us. The majority of the cost for the outing is born by us. We do, from time to time, have mutual fund or ETF product manufacturers contribute financially to reduce our cost. We choose the vendor on the basis of whether we are currently utilizing any of their products, and then ask them if they would like to contribute. The amount of contribution, if any, is decided by them. While the amount varies with each event, the product manufacturers have previously contributed between 5.0% and 20.0% of the cost of the event. We give verbal recognition to the vendor at the golf outing. Sometimes representatives of the vendor will attend the event for part of the day (usually for lunch). The amount the vendor contributes ranges from 0.075% to 0.225% of our annual income, which we believe does not create any influence on what products we utilize in client portfolios. We may also attend and sponsor other events that other companies host.

We must also inform you if we or a related person directly or indirectly compensate a third-party for referring clients to us. From time to time, we may engage solicitors to market our services. If we do so, you will receive a separate solicitor’s disclosure brochure describing our solicitation arrangements, the compensation we pay to the solicitor, and the terms of that relationship. You will also receive a copy of this Brochure.

Financial Information

As a registered investment adviser, we are required to provide clients with certain financial information or disclosures about our financial condition if we have financial commitments that impair our ability to meet contractual and fiduciary commitments to our clients. We have not been the subject of a bankruptcy proceeding and do not have any financial commitments that would impair our ability to meet any contractual or fiduciary commitments to our clients.