

## **WRAP FEE BROCHURE**

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This wrap fee program brochure provides information about the qualifications and business practices of MKD Wealth Coaches. 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](mailto: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](http://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 ten strategies within MKD Wealth Strategies: Constrained Return, Passive Allocation, RIS<sup>®</sup> Short Term Income Instruments, RIS<sup>®</sup> Tax Managed Income Strategy, RIS<sup>®</sup> Bond Strategy, RIS<sup>®</sup> Market Strategy, RIS<sup>®</sup> Multi-Asset Growth Strategy, Tactical Strategy, All Asset and Capital Asset Builder.

“Constrained Return” strategy is a risk adverse approach that seeks modest returns in exchange for highly active risk management; therefore, it may include frequent allocation shifts, non-traditional asset classes and alternative strategies. We use a multi-manager approach that is designed to primarily preserve capital and accept limited equity market exposure when appropriate. The “Tactical” Strategy seeks to achieve capital appreciation through a globally diversified portfolio of equity and fixed income markets and is premised on the principal that asset allocation is the primary driver of returns. The “Passive” Allocation strategy seeks to capture the returns of the equity and fixed income, real estate and commodities markets around the world. “All Asset” seeks to allocate among a wide range of assets in a flexible and dynamic way to capture return from a number of equity, fixed income and other sources. “Capital Asset Builder” uses a multi-manager, multi-strategy approach that seeks to capture returns of the global equity and fixed asset markets. The managers may use a sell discipline to respond to changing market conditions.

The “RIS<sup>®</sup>” 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.

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 are as follows:

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

\*\* Includes RIS® Bond, RIS® Market, RIS® Tax Managed Income, and RIS® Multi-Asset Growth Strategies Constrained Return, Tactical, All Asset and Capital Asset Builder.

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 a MKD Wealth Strategy are billed at the MKD Wealth Strategies Fee. 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, we retain the gain in our trade error account.

## **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**

All Asset, RIS <sup>®</sup> Bond and RIS <sup>®</sup> Tax Managed Income	No minimum
RIS <sup>®</sup> Short Term Income Instruments	\$ 2,500
Capital Asset Builder and Constrained Return	\$10,000
RIS <sup>®</sup> Market	\$25,000
Tactical, Passive Allocation and RIS <sup>®</sup> Multi-Asset Growth	\$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, investment management services for qualified retirement plans through our 401(k)abilities program, 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. 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](mailto: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***

We primarily utilize technical analysis to evaluate potential investments. Unlike fundamental analysis, technical analysis does not analyze the company's value, but instead analyzes the stock's price movement in the market. Charting is a form of technical analysis in which the

various technical factors are diagrammed in order to illustrate patterns. Technical analysis studies the supply and demand in the market in an attempt to determine what direction, or trend, will continue in the future. However, there are risks involved with this method, including the risk that the trends will change unpredictably, which is why we use a combination of methods and obtain information from a variety of sources.

We also employ fundamental analysis as supporting and supplemental data in evaluating potential investments. Fundamental analysis is a technique that attempts to determine a security's value by focusing on the economic well-being of a financial entity as opposed to only its price movements. When conducting fundamental analysis, we may review various documents, annual reports, SEC filings, and company press releases for factors including, but not limited to, whether the company's revenue is growing, if the company is profitable, if the company is in a strong enough position to beat its competitors in the future, and if the company is able to repay its debts. Because it can take a long time for a company's value to be reflected in the market, the risk associated with this method of analysis is that a gain is not realized until the stock's market price rises to the company's true value.

We obtain information from a number of sources, both public and by purchase, including financial newspapers and magazines, inspections of corporate activities, research materials prepared by third-parties, timing services, corporate rating services, annual reports, prospectuses and filings with the SEC, company press releases, and information from a client's Independent Manager (when applicable). 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.

### ***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 or life insurance products), exchange traded funds, municipal securities, options contracts, futures contracts and other types of investments. We often recommend mutual 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 within mutual fund families and between different mutual fund families when there are changes in your financial needs, market conditions, or economic developments.

### ***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. In addition, many mutual funds pay shareholder servicing fees (12b-1 fees) to brokerage firms and their registered representatives in consideration of their services to the fund's shareholders. 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.

#### **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 advisor 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 our Lori T. Williams, our Chief Compliance Officer, at (248) 418-5100 or [lori@mkdwealthcoach.com](mailto: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 beginning 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](mailto:lori@mkdwealthcoach.com).

### **Review of Accounts**

We review investments in our MKD Wealth Strategies or recommended mutual funds on an ongoing basis. Our investment adviser representatives conduct our client reviews. We monitor investments in your accounts on an ongoing basis and conduct regular account reviews at least annually. We recommend changes to holdings in your account as we deem necessary or appropriate.

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 8, as a licensed insurance agency, we may receive commission 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.

Each summer, we sponsor an all-day golf outing. We invite current clients and Center-of-Influence to be team captains and to invite three potential prospects that 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 from year to year, the product manufacturers may contribute 5.0% to 20.0% of the cost of the event. We give verbal recognize the vendor at the golf outing. Sometimes

representatives of the vendor they 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 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.