

***Item 1: Cover Page***



***3301 Bonita Beach Road, Suite 208  
Bonita Springs, FL 34134***

***239.992.3900***

***[www.ascendantwealth.com](http://www.ascendantwealth.com)***

***Disclosure Brochure***

***May 2018***

This brochure provides information about the qualifications and business practices of Ascendant Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at 239.992.3900. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Ascendant Wealth Management, LLC is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an investment adviser provide you with information about which you determine to hire or retain an adviser.

Additional information about Ascendant Wealth Management, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## Item 2: Material Changes

The last annual update of Ascendant Wealth Management, LLC's ("Ascendant, we, us, our, ours") was dated March 14, 2017. Since that time, we are deemed to have custody due to the ability to authorize first party money transfers (wires), due to the ability to authorize third party money transfers (standing letters of authorization) and via trusteeship, please refer to page 10, Custody.

Ascendant is required to send a summary of any material changes to our brochures to our clients ("you, your, yours") within 120 days of each year. We may also provide updated disclosure information about material changes on a more frequent basis. Any summaries of changes include the date of our last annual update of our brochure.

The most current version of our brochure may be requested by contacting Darin Morgan, Managing Member and Chief Compliance Officer, by phone at 239.992.3900 or by e-mail at [darinm@ascendantwealth.com](mailto:darinm@ascendantwealth.com). We will provide you with a current brochure at any time without charge.

Additional information about us and about persons affiliated with us who are registered as our investment adviser representatives ("your advisory representative") is also available via the SEC's website, at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Information regarding your advisory representative can also be found in the supplements at the end of this brochure.

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## ***Item 4: Advisory Business***

Ascendant, which is located in Bonita Springs, Florida, is a Limited Liability Company organized under the laws of the State of Florida. Darin Morgan founded Ascendant in 2007. Friedrich Schiller is a silent member and our principal owner. Ascendant is registered as an investment advisory firm with the SEC.

We work with you to identify your investment goals, objectives, and risk tolerance in order to create an initial portfolio allocation designed to complement your financial situation and personal circumstances. Portfolios primarily include mutual funds, Exchange Traded Funds (“ETFs”), stocks, fixed income investments, options, and alternative investments (for example, real estate investment trusts). Model portfolios, sub-advisers, and margin may also be used. The amount invested in each type of investment is determined based on target allocations and are managed within allocation ranges that we establish with you.

The investments we recommend for your account are diversified primarily by the type of investment (for example, stocks versus bonds). Secondly, they are diversified within individual asset classes (for example, stock mutual funds are diversified across size, style, sector and geography and bond mutual funds are diversified across term, quality, sector, and geography).

We use computer software that enables us to create asset allocation strategies customized for you across a broad array of investment types and styles. These strategies are determined based on your specific investment goals and objectives, risk tolerance, income requirements, investment time horizon and targeted rates of return. You may place reasonable restrictions on the types of investments made in your account and the percentage of your account that certain investments comprise. We may periodically rebalance your account so that it is consistent

with the allocation of investments that we have discussed with and had approved by you.

We tailor investment advisory services to the individual needs of the client. Our clients are allowed to impose restrictions on the investments in their account. All limitations and restrictions placed on accounts must be presented to us in writing. Clients will retain individual ownership of all securities.

We do not participate in a Wrap Fee Program.

As of December 31, 2017, we managed approximately \$110.1 million in client assets on a discretionary basis (where we made all of the investment decisions).

## ***Item 5: Fees and Compensation***

We offer our services on a fee-only basis. Our fee, which is billed monthly, is calculated based upon the market value of the investment assets in your account on the last day of the previous month.

Broker-dealers and other financial institutions that hold client accounts are referred to as custodians (hereinafter referred to as “custodian/broker-dealer”). Your custodian/broker-dealer determines the values of the investment assets in your account.

Fees for the initial month are based on the value of the investments on the date the custodian/broker-dealer receives them. Those fees are prorated based upon the number of calendar days in the month since you contracted to engage our services. Our fee schedule is described below:

<b><u>Assets Under Management</u></b>	<b><u>Advisory Fee<sup>1</sup></u></b>
First \$1,000,000	1.10%
Next \$1,000,000	0.90%
Next \$3,000,000	0.70%
Over \$5,000,000	0.50%

*<sup>1</sup>All fees are negotiable at our sole discretion.*

One-twelfth of the annual fee is charged each month, as follows:

### **Monthly Fee Calculation**

$$\frac{\text{Assets under Management} \times \text{Annual Fee \%}}{(\# \text{ of days in the month} / \# \text{ of days in the year})} = \text{Monthly Fee}$$

We will withdraw our fees directly from your investment account. You must authorize us in writing to have the custodian/broker-dealer that holds your account pay our fees to us directly by charging your account.

Your custodian/broker-dealer will provide you with statements that show the amount of the fees paid directly to us. You should review the custodian/broker-dealer's statements and verify the calculation of our fees. The custodian/broker-dealer does not verify the accuracy of fee calculations.

In addition to our fee, you may be required to pay other charges such as:

- custodial fees,
- brokerage commissions,
- transaction fees,
- internal fees and expenses charged by mutual funds or exchange traded funds ("ETFs"), and
- other fees and taxes on brokerage accounts and securities transactions.

None of these fees are paid to or are shared with us. We are available to answer any questions you have about fees and expenses.

Please be sure to read the section entitled "Brokerage Practices," which follows later in this brochure.

You must pay our advisory fees in advance of receiving our services. Should either one of us terminate the advisory agreement we have entered into before the end of a billing period, any unearned fees that were deducted from your account will be returned to you by us. The amount refunded to you is calculated by dividing the most recent advisory fee you paid by the total number of days in the month. This daily fee is then multiplied by the number of calendar days in the month that our agreement was in effect. This amount, which equals the amount we earned for the partial month, is subtracted from the total fee you paid in advance to determine your refund.

### ***Item 6: Performance-Based Fees and Side-by-Side Management***

Performance-based fees are designed to give a portion of the returns of an investment to the investment adviser as a reward for positive performance. This fee is generally a percentage of the profits made on the investments. We do not charge performance-based fees on any of our client accounts.

### ***Item 7: Types of Clients***

We provide advisory services primarily to high net worth individuals, including their trusts, estates and retirement accounts. We also provide services to corporations and business entities.

As a condition for starting and maintaining an advisory relationship, we generally require that you have an investment portfolio worth at least \$1 million. We, at our sole discretion, accept clients with smaller investment portfolios based upon various factors, including anticipated future earning capacity, anticipated future additional assets, account composition, related accounts, and pre-existing relationships with family members, co-workers, etc. We also consider the investment portfolios of your family members to

determine if your portfolio meets the minimum size requirement.

## ***Item 8: Methods of Analysis, Investment Strategies and Risk of Loss***

We select specific investments for your portfolios through the use of fundamental, cyclical and technical analysis.

Fundamental analysis is a method of evaluating a company that has issued securities by attempting to measure the value of its underlying assets. This entails studying overall economic and industry conditions as well as the financial condition and the quality of the company's management. Earnings, expenses, assets, and liabilities are all important in determining the value of a company. The value is then compared to the current price of the company's securities to determine whether to purchase, sell or hold those securities.

Cyclical analysis is a form of fundamental analysis that evaluates the performance of a company through the various stages of the economic cycle. Decisions regarding whether to purchase or sell the securities of an issuing company are made based on how the company performs during economic downturns and upswings.

Technical analysis is a method of evaluating securities by analyzing statistics associated with market activity, such as past prices and trading volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future performance.

We use computer software to assist us in analyzing your investment portfolio, assessing your risk tolerances, and recommending investments and investment strategies to you. This software incorporates Modern Portfolio Theory ("MPT"). MPT attempts to balance the

risk and return levels of an investment portfolio based on a client's risk tolerance and investment objectives. This software also provides us with mutual fund profiling and performance data and assists us with identifying optimal portfolio structures and how to rebalance them.

Our investment strategies may include long-term and short-term purchases and sales, and trading (selling securities within 30 days of purchase). You may place reasonable restrictions on the strategies to be employed in your account and the types of investments to be held in your account.

Although we manage your portfolio in a manner consistent with your specific risk tolerances, there can be no guarantee that our efforts will be successful. General economic conditions, current interest rates, the performance of a particular industry or a particular company, and any number of other factors can affect investment performance.

Investing in securities involves risk of loss that clients should be prepared to bear.

Our investment approach constantly keeps the risk of loss in mind. Clients face the following investment risks;

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar next year will not buy as much as a dollar today, because purchasing power is eroding at the rate of inflation.

- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

We reserve the right to advise clients on any other type of investment we deem appropriate based on the client's stated goals and objectives. We may also provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship or on any investment on which the client requests advice.

We typically do not receive initial public offering allocations (IPOs). In the event that we do

receive an allocation of an IPO we will determine for which clients the IPO is suitable and appropriate. We will submit one aggregated order on behalf of all our clients. In the event we receive only a partial fill of the IPO order, we will generally allocate shares on a pro rata basis, but may fill small orders entirely before applying the pro rata allocation.

### ***Item 9: Disciplinary Information***

We have not been the subject of any legal or disciplinary events that would be material to your evaluation of our business or the integrity of our management.

### ***Item 10: Other Financial Industry Activities and Affiliations***

We have no relationships or arrangements with related entities that would be material to our advisory business or to you as our client.

### ***Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading***

We have adopted a Code of Ethics ("Code") to address the securities-related conduct of our advisory representatives and employees. The Code includes our policies and procedures developed to protect your interests in relation to the following:

- the duty at all times to place your interests ahead of ours;
- that all personal securities transactions of your advisory representative (and our other investment advisory representatives and employees) be conducted in a manner consistent with the Code and avoid any actual or potential conflict of interest, or any abuse of your advisory representative's position of trust and responsibility;

- that your advisory representative may not take inappropriate advantage of his/her position;
- that information concerning the identity of your security holdings and financial circumstances are confidential; and
- that independence in the investment decision-making process is paramount.

We will provide a copy of the Code to you or any prospective client upon request.

We do not buy or sell securities for our own account that we also recommend to you. We nor our employees do not recommend to clients, or buy or sell for client accounts, securities in which they have a material financial interest. Your advisory representative is, however, permitted to buy or sell the same securities for his/her personal and family accounts that are bought or sold for your account. This raises potential conflicts of interest when your advisory representative purchases or sells a security that is:

- owned by you, or
- is being considered for purchase or sale for your account.

We have adopted policies and procedures that are intended address these conflicts of interest. These policies and procedures:

- require your advisory representative to act in your best interest,
- prohibit your advisory representative from favoring one client over another, and
- provide for the review of transactions to discover and correct any same-day trades that result in your advisory representative (or any of our other advisory representatives or employees) receiving a better price than a client.

Your advisory representative must follow our procedures when purchasing or selling the same securities purchased or sold for your account.

## ***Item 12: Brokerage Practices***

We recommend that the broker-dealer/custodian for your account be Fidelity Brokerage Services, LLC and its affiliate, National Financial Services LLC (collectively, “Fidelity”). We are independently owned and operated and not affiliated with Fidelity. Our use of Fidelity is, however, a beneficial business arrangement for us and for Fidelity. Information regarding the benefits of this relationship is described below.

In recommending Fidelity as your custodian/broker-dealer, we consider, at a minimum, its:

- existing relationship with us,
- financial strength,
- reputation,
- reporting capabilities,
- execution capabilities,
- pricing, and
- types and quality of research.

The determining factor in the selection of Fidelity to execute transactions for your accounts is not the lowest possible transaction cost, but whether Fidelity can provide what is in our view the best qualitative execution for your account.

Fidelity provides us with access to its institutional trading and custody services, which includes:

- brokerage,
- custody,
- asset allocation planning software,
- research, and
- access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

We are not required to affect a minimum volume of transactions or maintain a minimum dollar amount of client assets to receive these services.

Fidelity does not charge separately for holding and servicing your account, but may be compensated by you through other transaction-related fees associated with the securities transactions it executes for your account.

Fidelity also makes available to us other products and services that benefit us but may not benefit you directly. Some of these products and services assist us in managing and administering our client accounts, such as software and other technology that:

- provide access to account data such as:
  - duplicate trade confirmations,
  - bundled duplicate account statements, and
  - access to an electronic communication network for client order entry and account information;
- facilitate trade execution, including:
  - access to a trading desk serving investment advisers exclusively, and
  - access to bunched trading which provides the ability to combine securities transactions and then allocate the appropriate number of shares to each individual account;
- provide research, pricing information and other market data;
- facilitate payment of our fees from client accounts; and
- assist with back-office functions, record keeping and client reporting; and
- provide us with compliance-related publications.

Fidelity also makes available to us other services intended to help us manage and further develop our business. These services may include:

- consulting,
- publications and conferences on practice management,
- information technology,
- business succession,
- regulatory compliance, and

- marketing.

Fidelity may discount or waive the fees it would otherwise charge for some or all of these services. It may also arrange for certain of these services to be provided to us by independent third-parties. In that regard, Fidelity may pay all or a part of the fees of the third-party providing these services to us. Thus, we receive economic benefits as a result of our relationship with Fidelity because we do not have to produce or purchase the products and services listed above.

Because the amount of our compensation or the products or services we receive may vary depending on the custodian/broker-dealer we recommend to be used by our clients, we have a conflict of interest in making that recommendation. Our recommendation of Fidelity is based in part on the economic benefit to us and not solely on the nature, cost or quality of custody and brokerage services provided to you and our other clients. We nonetheless strive to act in your best interests at all times.

Commissions and other fees for transactions executed through Fidelity may be higher than commissions and other fees available if you use another custodian/broker-dealer to execute transactions and maintain custody of your account. We believe, however, that the overall level of services and support provided to our clients by Fidelity outweighs the benefit of possibly lower transactions cost which may be available under other brokerage arrangements.

Many of the services described above are used to benefit all or a substantial number of our clients, including clients whose accounts are not maintained through Fidelity. We do not attempt to allocate these benefits to specific clients.

You may direct us in writing to use a particular broker-dealer to execute some or all of the transactions for your account. If you do so, you are responsible for negotiating the terms and arrangements for the account with that broker-



dealer. We may not be able to negotiate commissions, obtain volume discounts, or best execution of transactions effected through broker-dealers other than Fidelity. In addition, under these circumstances a difference may exist between the commissions charged to you and other clients who do not direct us to use a particular broker-dealer.

We execute certain transactions for your account through the use of “bunched trades” (the purchase or sale of a security for the accounts of multiple clients in a single transaction). If a bunched trade is executed, you and each other participating client will receive a price that represents the average of the prices at which all of the transactions in a given bunch were executed. Executing a bunched trade allows transaction costs to be shared equally and on a pro rata basis among all of the participating clients. If the order is not completely filled, the securities purchased or sold are distributed among you and other participating clients on a pro rata basis or in some other equitable manner.

Bunched trades are placed only when we reasonably believe that the combination of the transactions provides better prices for you and other clients than had individual transactions been placed for your accounts.

Transactions for the account of your advisory representative (as well as the accounts of our other investment advisory representatives and employees) may be included in bunched trades. They will receive the same average price and pay the same commissions and other transaction costs, as you will. Transactions for the accounts of your advisory representative (as well as our other investment advisory representatives and employees) will not be favored over transactions for your account.

We are not obligated to include your account or the accounts of any other client account in a bunched trade. Bunched trades will not be effected for any client’s account if doing so is prohibited or otherwise inconsistent with that

client’s investment advisory agreement. No client will be favored over any other client

### ***Item 13: Review of Accounts***

Our advisory representatives review your account on at least a semi-annual basis and recommend changes to the account when we believe it is appropriate to do so. The performance of your account is compared to goals that were established based on your investment objectives and risk tolerance. As part of this review, we consider general conditions in the stock and bond markets, changes in the individual investments you own, changes in your personal circumstances, and changes in your investment objectives and risk tolerance. We will review your account more frequently if we believe that market conditions or your personal circumstances warrant it.

You will receive statements from Fidelity at least quarterly. These statements identify your current investment holdings, the cost of each of those investments, and their current market values.

### ***Item 14: Client Referrals and Other Compensation***

As previously noted in Item 12, “Brokerage Practices”, we receive certain economic benefits as a result of our participation in Fidelity’s institutional program.

We do not directly or indirectly compensate any person who is not one of our investment advisory representatives or employees for client referrals.

### ***Item 15: Custody***

You will receive statements from Fidelity regarding your account on at least a quarterly basis. We urge you to carefully review these statements. You should verify that the transactions in your account are consistent with

your investment goals and the objectives for your account. We also encourage you to contact your advisory representative or our Chief Compliance Officer should you have any questions or concerns regarding your account.

One of our advisory representatives acts as trustee for client trust. This form of custody is offered on a limited basis. We comply with the SEC's Custody Rule with regard to the custody of the trust assets; annually the Firm is subject to a surprise examination by an independent public accountant.

Clients may provide us with written ongoing authorization to wire money between the client's accounts held with the qualified custodian directly to an outside financial institution (i.e. a client's bank account). A copy of this authorization is provided to the qualified custodian. The authorization includes the client's name and account number(s) at the outside financial institution(s) as required.

Clients may provide us with a standing letter of authorization (or similar asset transfer authorization) which allows us to disburse funds on behalf of clients to third parties. We ensure the following conditions are in place when deemed to have custody via third party money movement:

1. The client provides a Written Authorization to the custodian that includes all appropriate information as to how the transfer should be directed;
2. The Written Authorization includes instruction to direct transfers to the third party either on a specified schedule or from time to time;
3. Appropriate verification is performed by the custodian, along with a transfer of funds notice to the client promptly after each transfer;

4. The client may terminate or change the instruction to the custodian;
5. We have no authority or ability to designate or change any information about the third party contained in the instruction;
6. We maintain records showing that the third party is not a related party of the Firm or located at the same address as us; and
7. The custodian sends the client a written initial notice confirming the instruction and an annual written confirmation thereafter.

### ***Item 16: Investment Discretion***

We offer our advisory services on a discretionary basis, meaning that we do not need advance approval from you to determine the type and amount of securities to be bought and sold for your accounts. We may only exercise discretion if you have provided that authority to us in writing. This authorization is typically included in the investment advisory agreement you enter into with us.

The discretionary authority you grant to us does not provide us the ability to choose the broker-dealer through which transactions will be executed. Additionally, our discretionary authority does not provide us the ability to withdraw funds from your account (other than to withdraw our advisory fees, which may only be done with your prior written authorization). We will exercise discretion in a manner consistent with the stated investment objectives for your account.

### ***Item 17: Voting Client Securities***

We do not take any action or give any advice with respect to voting of proxies solicited by or with respect to the issuers of securities in which your

account may be invested. In addition, we do not take any action or give any advice with respect to any securities held in any account that are named in or subject to class action lawsuits. We will, however, forward to you any information received by us regarding proxies and class action legal matters involving any securities held in your accounts.

We have no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

We do not require prepayment of fees of both more than \$1,200 per client, and more than six months in advance; and therefore are not required to provide a balance sheet to clients.

## ***Item 18: Financial Information***

**Form ADV Part 2B- Investment Adviser Brochure Supplement**



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**Darin A. Morgan**

**March 2018**

This brochure supplement provides information about Darin A. Morgan that supplements the Ascendant brochure. You should have received a copy of that brochure. Please contact Darin Morgan, Managing Member and Chief Compliance Officer, if you did not receive Ascendant's brochure or if you have any questions about the contents of this supplement.

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

## **Educational Background and Business Experience**



Darin Morgan

*Year of birth:* 1965

### *Formal education:*

- B.B.A. – Texas Tech University, 1987
- M.B.A. – Southern Methodist University, 1988
- Master of Accounting – Nova Southeastern University, Ft. Lauderdale, FL, 2000

### *Business background:*

- Ascendant Wealth Management LLC, Managing Member/Chief Compliance Officer, (10/07 to Present)
- SunTrust Bank, Naples, FL, Vice President/Portfolio Manager, (01/01 to 10/07)

## **Disciplinary Information**

Mr. Morgan has not been the subject of any legal or disciplinary event.

## **Other Business Activities**

Mr. Morgan is not engaged in any business activities other than those related to Ascendant Wealth Management, LLC.

## **Additional Compensation**

Mr. Morgan does not receive any additional compensation related to the advisory services provided to you.

## **Supervision**

Mr. Morgan is the Managing Member and Chief Compliance Officer of Ascendant Wealth Management, LLC. He supervises all other of Ascendant's investment advisory representatives.

Mr. Morgan is supervised by David Corcoran, Senior Vice President. Mr. Corcoran can be reached at 239.992.3900.

We supervise Mr. Morgan by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics. We will monitor the advice that Mr. Morgan gives to you by performing the following reviews:

- A review of relevant account opening documentation when your relationship is established
- A daily review of account transactions
- Review custodial information on a quarterly basis to assess account activity
- Perform annual oversight so that Mr. Morgan is aware of your current financial situation, objectives, and individual investment needs
- A review of client correspondence on an as needed basis.

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**David P. Corcoran**

**March 2018**

This brochure supplement provides information about David P. Corcoran that supplements the Ascendant brochure. You should have received a copy of that brochure. Please contact Darin Morgan, Managing Member and Chief Compliance Officer, if you did not receive Ascendant's brochure or if you have any questions about the contents of this supplement.

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

## **Educational Background and Business Experience**



David Corcoran

*Year of birth:* 1957

### *Formal education:*

- B.S. Economics & History – Williams College, 1980

### *Business background:*

- Ascendant Wealth Management LLC, Senior Vice President/Portfolio Manager, (10/07 to Present)
- SunTrust Bank, Naples, FL, Vice President/Portfolio Manager, (12/00 to 10/07)

## **Disciplinary Information**

Mr. Corcoran has not been the subject of any legal or disciplinary event.

## **Other Business Activities**

Mr. Corcoran is not engaged in any business activities other than those related to Ascendant Wealth Management, LLC.

## **Additional Compensation**

Mr. Corcoran does not receive any additional compensation related to the advisory services provided to you.

## **Supervision**

Mr. Corcoran is supervised by Darin Morgan, Managing Member and Chief Compliance Officer. Mr. Morgan can be reached at 239.992.3900.

We supervise Mr. Corcoran by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics. We will monitor the advice that Mr. Corcoran gives to you by performing the following reviews:

- A review of relevant account opening documentation when your relationship is established
- A daily review of account transactions
- Review custodial information on a quarterly basis to assess account activity
- Perform annual oversight so that Mr. Corcoran is aware of your current financial situation, objectives, and individual investment needs
- A review of client correspondence on an as needed basis.