



# **KINGSVIEW**

## ASSET MANAGEMENT

### **Item 1- Form ADV Part 2 - Disclosure Brochure**

Effective: June 05, 2017

This brochure provides information about the qualifications and business practices of Kingsview Asset Management, LLC. If you have any questions about the contents of this brochure, please contact us at: 312-870-6701, or by email: [info@kingsviewam.com](mailto:info@kingsviewam.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.

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

**Kingsview Asset Management, LLC**

**Firm CRD#: 148107**

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## **Item 2 - Material Changes**

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### **Material Changes since the Last Update**

The material changes in this brochure from the last annual updating amendment of Kingsview Asset Management, LLC (“KAM”) on March 30, 2016 are described below. This list summarizes changes to policies, practices or conflicts of interests only.

- Item 4 has been updated to disclose additional services being offered and the portfolio management division of KAM called Kingsview Investment Strategies (“KIS”). KAM’s total assets under management are \$375,646,667.
- Item 5 has been updated to reflect billing practices and fee schedules for the various services offered. This item was also updated to reflect conflicts of interest that may arise from associates of KAM selling other products and services.
- Item 8 has been updated to reflect the risks associated with the additional services being offered.
- Item 10 has been updated to more accurately disclose potential conflicts of interest in other activities.
- Item 11 has been updated to disclose possible material financial interest conflicts of interest.
- Item 12 has updated language regarding current broker/dealer recommendations and services.
- Item 13 has been updated to reflect the change in Chief Compliance Officer from Noel Sinclair to Sean McGillivray.
- Item 14 has been updated to disclose additional benefits received from various broker/dealers.
- KAM has moved the principle office to 509 SE 7th Street 2nd Floor, Grants Pass, OR 97527.

### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 312-870-6701 or by emailing [info@kingsviewam.com](mailto:info@kingsviewam.com).

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## **Item 4 -Advisory Business**

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### **Firm Description**

Kingsview Asset Management, LLC, (KAM) is a registered investment advisor with the Securities and Exchange Commission (SEC). Registration as a registered investment advisor does not imply a certain level of skill or training. The firm was founded in 2008 and conducts business in the state of Oregon and other states, where the firm is currently notice filed.

### **Advisory Services Offered**

KAM provides personalized, confidential financial planning and investment management to individuals, pension and profit sharing plans, endowments, trusts, and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

KAM is a financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. KAM does share common ownership with other entities that may sell commissioned financial products. No commission in any form will be accepted by KAM but may be accepted by associated persons of KAM.

Investment advice is an integral part of financial planning. In addition, KAM advises clients regarding cash flow, college planning, retirement planning, tax planning and estate planning. Investment advice is provided, with the client making the final decision on investment selection. KAM does not act as a custodian of client assets. The client always maintains asset control. KAM places trades for clients under a limited power of attorney arrangement.

An investment questionnaire is completed or the client is interviewed in order to evaluate each client's initial situation. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting with an Investment Advisor Representative (IAR) which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

### **Principal Owners**

Kingsview Group - Direct Owner

Indirect Owner - Joshua Lewis - Managing Member

## **Types of Advisory Services**

KAM provides investment supervisory services, also known as asset management services and furnishes investment advice through consultations.

On more than an occasional basis, KAM furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

KAM offers custom investment portfolio construction tailored to each client's individual needs. KAM uses Mutual Funds, Equities, Fixed Income, Exchange Traded Funds (ETFs), Real Estate, Hedge Funds, Private Equity Funds, Venture Capital Funds, Private Placements, Commodities, Options, Non-US Securities, Index Funds, Derivatives, Inverse and Leveraged ETFs Publicly Traded Master Limited Partnerships, Futures Contracts, Exchange Traded Notes, Closed End Funds, Unit Investment Trusts, Non Traded Real Estate Investment Trusts, and Multi-Strategy Funds to accomplish this objective. KAM may recommend investments, such as, Private Placements to Accredited Investors.

## **Portfolio Managed by IAR**

The IAR is a discretionary account that is managed at the discretion of an IAR who is either an independent contractor or employee of KAM. The investment management style can range from aggressive to conservative. At the discretion of the IAR, trades may be made in traditional equities (stocks), fixed income instruments (bonds), equity and or index options, mutual funds, unit investment trusts, futures, options on futures or any other investment the IAR deems appropriate. Some investments utilized may include the use of margin or leverage. A KAM IAR may also use Kingsview Investment Strategies portfolios models for an additional fee.

KAM only allows those IARs deemed experienced and qualified to manage these types of accounts. The IAR must prove to the Chief Compliance Officer of KAM that he or she has sufficient experience with the types of investments they will be recommending and such recommendations must be approved by the Chief Compliance Officer of KAM. In addition, the IAR will have to demonstrate an in-depth understanding of investing in general and specifically the types of investments he or she will be making. The Chief Compliance Officer or an appointee will monitor the trading accounts of the IAR. The efforts made by KAM to qualify its IARs and monitor the accounts are no guarantee that the account will not incur losses that may be substantial.

## **Kingsview Investment Strategies (KIS)**

KAM has an internal portfolio management group known as Kingsview Investment Strategies (KIS). KIS asset management services are offered to KAM clients through KAM IARs. KIS asset management services are also offered to non-KAM clients and unaffiliated advisors through model leases, solicitor agreements and model trading agreements. KAM clients utilizing asset management services provided by KIS will incur charges in addition to the KAM advisory fee.

## **KIS Small Account Models (SAM)**

KIS SAM portfolios are specifically designed for accounts under \$25,000, as they are a simplified, strategic asset allocation that are rebalanced on a quarterly basis. Portfolios are matched to a client's risk tolerance. Portfolios are diversified amongst many asset classes using exchange traded funds.

### **KIS CORE**

KIS Core is strategic asset allocation strategy that monitors each account on a daily basis using the firm's tracking software program. Portfolios are adjusted when current allocations vary by a predetermined percentage from the target allocations. Although KAM will make every effort to reallocate portfolios in the manner described, there is no guarantee that KAM can achieve this goal. KAM may recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. KAM may recommend employing cash positions as a possible hedge against market movement which may adversely affect the portfolio. KAM may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector exposure to a specific security or class of securities, overweighting of the position(s) in the portfolio, change in risk tolerance, or any risk deemed unacceptable for the client's risk tolerance.

### **KIS Active Asset Allocation (AAA)**

KIS AAA portfolio is constructed based on the client's individual needs and will hold stocks, bonds, mutual funds, exchange-traded-funds and or cash. This portfolio rebalances based on proprietary valuation analysis in an attempt to take advantage of market pricing anomalies or strong market sectors.

### **KIS Asset Protection**

KIS Asset Protection is designed to protect a client who has a particularly concentrated stock position from substantial declines in value of the portfolio through the use of stock options. The strategy involves simultaneously selling a call option above the price of the underlying security and buying a put option, or bear put option spread, below the current price of the security. The strategy is known as a collar and may limit the gain on the underlying security. In some cases, the options positions will be adjusted in price to avoid the sale of the underlying security as a result of an options assignment. Downside protection may be limited if the portfolio manager has elected to buy a put options spread instead of just buying puts.

### **KIS Global Dynamic Hedge**

KIS Global Dynamic Hedge is designed to have a market-hedged allocation to four major asset classes in equity and fixed income by the use of options to protect downside. This portfolio will be rebalanced as necessary to keep the underlying weightings in line with the original allocations.

### **KIS Global Macro Trend**

KIS Global Macro Trend is a sophisticated, actively managed, trend following portfolio of futures and options positioning that uses quantitative market data to determine long and short exposure. The portfolio is a very aggressive trading strategy and while stop losses and other risk measurements are in place, the allocations could leave an investor inversely or “short” positioned against major market indices.

### **KIS Multi-Strategy**

KIS Multi-Strat combines groups of non-correlating assets along with style and manager diversification to present a portfolio that has a wide range of diversified positioning. The portfolio is matched to one of five risk tolerances of the investor, and rebalances throughout the quarter as needed per the underlying strategies. Methodologies within the portfolio include strategic, active and tactical approaches to investing.

### **KIS Ambassador Income**

KIS Ambassador Income is constructed largely as fixed income alternative to traditional bond indexes where a client may have assets outside the portfolio heavily invested in traditional fixed income, or express a need for current income along with some interest rate hedging capabilities. The strategy uses yield-curve analysis, credit spread determination and central bank interest rate policy to determine portfolio weightings. This portfolio will hold a minimal amount of equity and be mainly focused on creating yield and interest, but will also be holding cash.

### **KIS Blue Chips**

KIS Blue Chips is founded on the basis of stock specific investing according to quantitative, fundamental factors that are measured real-time and guide our direction of investment. The analysis is performed on the S&P 500 where trends can be confirmed and trusted, with the goal to pick the best areas of the equity market and avoid the worst ones; thus outperforming with less risk on the upside when equity market action is positive and providing some limited downside protection when equity market action is poor.

### **KIS Blue Chips Elite**

KIS Blue Chips Elite is a concentrated portfolio of specific investing according to quantitative, fundamental factors that are measured real-time and guide our direction of investment. The analysis is performed on the S&P 500 where trends can be confirmed and trusted. The objective of the portfolio is to pick the best areas of the equity market and avoid the worst ones; thus outperforming with less risk on the upside when equity market action is positive and providing some limited downside protection when equity market action is poor.

### **KIS ProCap**

KIS ProCap is founded on the basis of absolute return investing according to macroeconomic indicators. In composition, the portfolio strives to identify the current cycle of a multitude of asset classes in the marketplace, and invest accordingly through the use of exchange traded funds. More

specifically, the portfolio seeks to provide opportunistic positioning during economic and market expansions by purchasing indexes that tend to correlate with an appreciating asset price environment. This could include, but is not limited to, domestic and international equity, currency indexes, and commodities. Alternatively, if an economic and market contraction is identified, the program will employ defensive positioning, which can range from cash to fixed income to investments that provide inverse market exposure.

### **KIS Sector Alpha**

KIS Sector Alpha is founded on the basis of sector specific investing according to macroeconomic indicators. In composition, portfolio strives to identify the current cycle of 10 specific sectors (and their various subsectors) in the S&P 500, and invest according to those trends using exchange traded funds. The analysis is performed with the goal to pick the best overall sectors of the equity market and avoid the worst ones; thus outperforming with less risk on the upside when equity market action is positive and providing some downside protection when equity market action is poor.

### **Investments Strategies and Trades Initiated by Clients**

This service is meant to be only a part of the client's overall investment strategy and is considered an alternative, non-correlated asset class. Clients will do their own research and present their trading ideas and investment strategies to the IAR. The IAR will help the client determine if the trades or trading strategies are going to help the client reach their investment objectives.

The client may want to trade complex investment products and/or strategies. The IAR will provide a detailed explanation of these products and/or strategies and explain how they are designed to work. The IAR may help the client execute the trades and provide ongoing monitoring of the client's investment portfolio.

### **Selection of Other Advisors**

Commodity Trading Advisor Accounts and Third Party Advisors – Kingsview Asset Management has entered into agreements with third-parties offering managed account programs. Under these agreements, the third-parties have agreed to provide various types of money management programs and services to the clients of KAM.

Commodity Trading Advisor Accounts - IARs may recommend and assist clients with establishing futures accounts managed by a Commodities Trading Advisor (CTA). The IAR may also be registered to sell futures as an Associated Person with an Introducing Broker. If the IAR is also registered to sell futures he may receive usual and customary compensation associated with the trading of futures.

Third Party Advisors - KAM enters into agreements with third-party advisors offering managed account programs. Under these agreements, the third-party advisors have agreed to provide various types of money management programs and services to the Clients of KAM. All managed account programs utilized by KAM selects will be licensed as investment advisors by their resident state or with the United States Securities and Exchange Commission.



KAM will enter into agreements with managed account programs for the provision of client services. KAM clients will enter into a direct contract with the managed account program. After gathering information about a client's financial situation and investment objectives, KAM may select a third-party advisor depending on the money management services required by the client. The compensation of both KAM and managed account program is fully disclosed to each client in the program.

KAM maintains the authority to hire and terminate the services of each managed account program employed by KAM.

Each program's fees are established and payable in accordance with the Form ADV Part 2 or other equivalent disclosure document of each managed account program selected by KAM. Fees for these programs may or may not be negotiable by KAM.

Prior to rendering investment management services, KAM will ascertain, in conjunction with the client, the client's financial situation, risk tolerance, and investment objective(s).

### **Financial Planning**

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client. A conflict of interest exists because investment advice may involve investment advisory services for which KAM will charge an asset under management fee in addition to the financial planning fee. Additional conflicts of interest arise if the recommended plan involves the purchase of insurance products or investments into commodity futures. This is due to KAM's affiliations with properly licensed entities, that are entitled to receive compensation for such transactions. The client is under no obligation to follow the advisor's recommendation. The client is under no obligation to affect the transactions with KAM.

The fee for a financial plan is predicated upon the facts known at the start of the engagement. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

### **Ongoing Financial Consulting**

KAM IARs may offer clients an ongoing financial consulting relationship. Where the IAR provide advice and guidance on a client's overall financial plan. This service can include investment advice and financial planning. The fee for consulting will vary upon the complexity of the client's financial plan.

### **Pension Consulting Services**

KAM offers ongoing consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- allocating plan assets to various objectives
- selecting money managers to manage plan assets in ways designed to achieve objectives
- recommending or selecting different investment options from which plan participants can choose
- monitoring performance of money managers and mutual funds and making recommendations for changes
- selecting other service providers, such as custodians, administrators and broker-dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

### **Wrap Fee Programs**

A wrap fee program is an investment program wherein the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. KAM does not participate in any wrap fee programs.

### **Assets Under Management**

As of December 31st 2016, KAM manages approximately \$345,956,555 on a discretionary basis, and \$29,690,112 is managed on a non-discretionary basis.

## Item 5 – Fees and Compensation

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KAM bases its fees on a percentage of assets under management and fixed fees.

The annual advisory fee for asset management services is negotiable. Current client relationships may exist where the fees are lower than the fee schedule below.

Pre-paid advisory fee refunds due clients who have terminated their contract before the end of a billing cycle will be eligible for a refund upon written request and will be issued a check within the first week of the next billing cycle. Lower fees for comparable services may be available from other sources.

Financial plans are priced according to the degree of complexity associated with the client's situation. Pre-paid financial planning fee refunds due clients who have terminated in writing the service before the end of the billing cycle will be issued a check within the first week of the next billing cycle.

### **Management Fees:**

#### **Portfolios Managed by IAR**

Management fees are capped at 2.50% annual, based on the value of the account or related accounts, at the beginning of each quarter. The fee will be charged in advance. A client's starting quarter will be based upon the month they begin services with KAM. Fees will be deducted every 3 months after that initial month so a client will end up on one of three cycles.

1. Jan, Apr, Jul, Oct.
2. Feb, May, Aug, Nov.
3. Mar, Jun, Sep, Dec.

The first quarter's fees will be prorated for the days missed during the first month. All fees will be calculated based on the value at the beginning of each quarter. The management fee is disclosed in the firm's Investment Advisory Agreement. Clients will acknowledge the fee to be charged by initialing under the section where it is disclosed.

#### **Portfolios Managed by KIS**

Management fees are capped at 2.10% annual, based on the value of the account or related accounts at the beginning of each quarter. The total fee is comprised of an advisory fee and a model fee. These fees are the combined fee for the IAR and KIS Portfolio manager's services and will not exceed the annual cap. The fee will be charged in advance. A client's starting quarter will be based upon the month they begin services with KAM. Fees will be deducted every 3 months after the initial month so a client will end up on one of three cycles.

1. Jan, Apr, Jul, Oct.
2. Feb, May, Aug, Nov.

3. Mar, Jun, Sep, Dec.

The first quarter's fees will be prorated for the days missed during the first month. All fees will be calculated based on the value at the beginning of each quarter. The IAR's fee, the KIS model fee and the total fee are disclosed in the firm's Investment Advisory Agreement. Clients will acknowledge the fee to be charged by initialing under the section where it is disclosed.

Each KIS managed portfolio strategy has its own model fee schedule.

**KIS Small Account Model**

0.50% annual fee

**KIS CORE, KIS AAA, KIS Global Macro Trend, KIS Multi-Strategy, KIS Ambassador Income, KIS Blue Chips, KIS Blue Chips Elite, KIS ProCap and KIS Sector Alpha**

First \$250,000 – 0.60% annual fee

Next \$750,000 – 0.50% annual fee

Any amount over \$1,000,000 – 0.40% annual fee

**KIS Asset Protection and KIS Global Dynamic Hedge**

1.00% annual fee

**Investments Strategies and Trades Initiated by Clients**

0.50% annual fee

**Commodity Trading Advisor Accounts and Third Party Advisors.**

The client will pay only those fees disclosed in the third party entity's documents. No additional management fees will be charged by KAM.

In order for an IAR to be compensated for a Commodity Trading Advisor account, he must also be registered as an Associated Person with an Introducing Futures Broker. The IAR acting as an Associated Person will earn the commissions generated by the futures trading done by the Commodities Trading Advisor. The IAR/Associated Person does not influence the number of transactions made by the Commodity Trading Advisor. In addition, the Commodity Trading Advisor may share his management fees with the Associated Person. KAM will not be compensated in any manner by the Commodity Trading Advisor.

Third Party Advisors share a percentage of the fees they charge clients with KAM that are referred by Investment Advisory Representatives of KAM. The percentage of the fee received by KAM will be disclosed to the client in the form of a solicitor's agreement.

### **Financial Planning**

The fee range is \$250 to \$2,500 and is negotiable.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

### **Ongoing Investment Consulting**

The fee range is from \$500 to \$5,000 per quarter based on the value of the assets under advisement. Advisor will not exercise discretion over these accounts or enter any trades. The advisor will consult with the client in person, by phone and/or email on an ongoing basis. The fee is negotiable.

### **Fee Billing**

### **Financial Planning**

Investment management fees are billed quarterly, in advance, meaning that we invoice you before the three-month billing period has ended. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account. Fees for financial plans are due upon delivery of the financial plan.

### **Ongoing Investment Consulting**

Fees are billed either quarterly or annually in advance. A fee schedule will be supplied to the client with the investment consulting contract. Fees will be refunded on a pro-rata basis upon written notice of termination.

### **Other Fees**

Custodians may charge transaction fees on purchases or sales of certain exchange traded funds, listed securities, over-the-counter securities, mutual funds, or options on securities. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

KAM, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

KAM requires all accounts under management to be included in our accounting and performance reconciliation system. Each account will be assessed a flat, per quarter charge of up to \$15. This

fee will be billed simultaneously with quarterly advisory fees and included within the total fees debited to client's account.

## **Expense Ratios**

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% per year for their services on a client's assets in the fund. These fees are in addition to the fees paid by you to KAM.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

## **Past Due Accounts and Termination of Agreements**

KAM reserves the right to stop work on any account that is more than 45 days overdue. In addition, KAM reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in KAM's judgment, to providing proper financial advice.

## **Outside Compensation for the Sale of Securities to Clients**

Michael Bird, Cody Ashton, Brian Smalley, Arrah-Wonah Nester William Chad Mitton and David Dorsey in their role as a registered representatives of Purshe Kaplan Sterling Investments accepts compensation for the sale of securities to KAM clients. A KAM IAR may hold licensing that makes the IAR eligible to receive commissions for selling insurance products and/or commodity futures accounts.

### ***1. This is a Conflict of Interest***

The supervised persons will accept compensation for the sale of securities or other investment products, including asset based sales charges or service fees from the sale of mutual funds to its clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of securities or investment products for which the supervised persons receives compensation, they will document the conflict of interest in the client file and inform the client of the conflict of interest.

### ***2. Clients Have the Option to Purchase Recommended Products from Other Brokers***

Clients always have the option to purchase KAM recommended products through other brokers or agents that are not affiliated with KAM.

### ***3. Commissions are not the Primary Source of Income for KAM***

Commissions are not KAM's primary source of compensation for advisory services.

#### **4. *Advisory Fees in Addition to Commissions or Markups***

Advisory fees that are charged to clients are not reduced to offset the commissions or markups on securities or investment products recommended to clients.

### **Item 6 – Performance-Based Fees**

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Fees are not based on a share of the capital gains or capital appreciation of managed securities. KAM does not use a performance-based fee structure because of the potential conflict of interest.

### **Item 7 – Types of Clients**

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KAM generally provides investment advice to individuals, pension and profit sharing plans, endowments, trusts, and small businesses.

Client relationships vary in scope and length of service.

#### **Account Minimums**

The minimum account size is \$25,000 of assets under management.

KAM has the discretion to waive the account minimum. Accounts of less than \$25,000 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total to \$25,000 within a reasonable time. Other exceptions will apply to employees of KAM and their relatives, or relatives of existing clients.

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

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#### **Methods of Analysis**

#### **Portfolio Managed by the IAR**

The security analysis methods for the IAR Account may include charting, fundamental analysis, technical analysis, and cyclical analysis. The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, the World Wide Web and company press releases.

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. KAM will assist clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above.

However, there is no guarantee that a client will meet their investment goals.

Each client engagement will entail a review of the client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a client's account. The Advisor shall rely on the financial and other information provided by the client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

### **KIS Small Account Models (SAM)**

KIS Small Account Models are a simplified, strategic asset allocation that via tracking software are rebalanced quarterly to target allocations and are diversified amongst many asset classes using exchange traded funds. Portfolios are matched to a client's risk tolerance. The allocation is based mainly on the answers given by the client on KAM's investment questionnaire. The prospect is then given a comprehensive investment proposal which the IAR and client review.

### **KIS CORE**

A KIS CORE account is constructed using the firm's tracking software program that allocates investable funds among a diversified portfolio of exchange traded funds and an alternative asset class. The allocation is based mainly on the answers given by the client on KAM's investment questionnaire. The prospect is then given a comprehensive investment proposal which the IAR and client review.

### **KIS Active Asset Allocation (AAA)**

A KIS AAA account uses a combination of proprietary and established analysis. Portfolios are constructed at the manager's discretion based on market conditions. The manager may hold all cash until he feels market conditions warrant that new investments be made.

### **KIS Global Dynamic Hedge**

KIS Global Dynamic Hedge features the use of options to protect downside in four major asset classes of equity and fixed income. This strategy closely monitors price fluctuation as it relates to the underlying holdings as to maximize options protection and limit drag on the portfolio.

### **KIS Global Macro Trend**

KIS Global Macro Trend portfolio is a very aggressive trading strategy and that uses stop losses and other risk measurements to limit portfolio volatility, as deemed by the program. As with any momentum strategy, trend shifts in the market can expose the portfolio to heightened periods volatility. This portfolio should only be utilized for investors with a high risk tolerance.

### **KIS Multi-Strategy**



KIS Multi-Strat features manager diversification to compose a portfolio that has a wide range of diversified positioning in, at times, non-correlating assets. Multiple management styles that each provide prudent stock, bond, and alternative market exposure at given times serve to insulate the portfolio from periods of heightened volatility. The allocation is based mainly on the answers given by the client on KAM's investment questionnaire. The prospect is then given a comprehensive investment proposal which the IAR and client review.

### **KIS Ambassador Income**

KIS Ambassador Income acts as fixed income alternative to traditional bond indexes and will use interest-rate hedging techniques along with non-traditional fixed income index exposure to limit downside correlation in a rising interest rate environment. This portfolio will hold a minimal amount of equity and be mainly focused on creating yield and interest, but will also be holding cash.

### **KIS Blue Chips**

KIS Blue Chips is an equity portfolio that uses quantitative trends within the S&P 500 to allocate to a basket of stocks that may be best poised to rise in value in the future with the goal to pick the best areas of the equity market and avoid the worst ones. When fundamentals are slow to change, this portfolio may underperform on the downside as new positions are entered to replace the aging ones as fundamentals catch up to price action.

### **KIS Blue Chips Elite**

KIS Blue Chips Elite is a concentrated equity portfolio that uses quantitative trends within the S&P 500 to allocate to a basket of stocks that may be best poised to rise in value in the future with the goal to pick the best areas of the equity market and avoid the worst ones. When fundamentals are slow to change, this portfolio may underperform on the downside as new positions are entered to replace the aging ones as fundamentals catch up to price action.

### **KIS ProCap**

KIS ProCap relies on analysis of macroeconomic indicators to drive the portfolio allocation. This allocation will be opportunistic positioning during economic and market expansions and defensive positioning when fundamental data signifies economic and market contraction. Investment vehicles used range from equities and fixed income indexes to investments that provide inverse market exposure.

### **KIS Sector Alpha**

KIS Sector Alpha attempts to identify the current cycle of 10 specific sectors (and their various subsectors) in the S&P 500, and invest according to those trends using exchange traded funds. The analysis is performed with the goal to pick the best overall sectors of the equity market and avoid the worst ones, and will be rebalanced as economic fundamentals change with respect to their sector representation.

## **Investment Strategies**

### **Portfolio Managed by IAR**

Strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing (including covered options, uncovered options or spreading strategies). The investment strategy is developed by the individual IAR, reviewed by KAM management before it is presented to the client.

KAM IARs generally employ investment strategies that may involve domestic equity and international market risks. The risks associated with a particular strategy are provided to each client in advance of investing client accounts.

Certain strategies pursued above may involve foreign risks, currency conversion risks, leverage and other risks. Clients should read all material and understand the risks prior to making an investment. Certain strategies may have significant embedded risks that may compound gains and losses. Please remember that different types of investments involve varying degrees of risk, including the possible loss of principal and that past performance may not be indicative of future results. Therefore, it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies undertaken by KAM IARs) will be profitable.

### **KIS Small Account Models (SAM)**

KIS Small Account Models are a diversified strategic asset allocation that via tracking software are rebalanced quarterly to target allocations by the portfolio manager provided the trades make economic sense. This investment program's major risks of loss are market risk, inflation risk and interest rate risk. Considering the diversified nature of these investment portfolios, there is a lesser risk of loss due to currency fluctuations and business risks.

### **KIS CORE**

Once the KIS CORE portfolio is established, the positions are entered into the KAM proprietary tracking program. The tracking program automatically monitors each account's exchange traded funds positions in real time and alerts the investment manager when the current allocations have varied from the target allocations by a preset percentage. When this condition occurs, the investment manager generally makes adjusts by selling those securities that are over weighted and buys those that are underweighted. These adjustments may not be made if, at the discretion of the investment manager, the trades do not make economic sense due to small size of the trades. This investment program's major risks of loss are market risk, inflation risk and interest rate risk. Considering the diversified nature of these investment portfolios, there is a lesser risk of loss due to currency fluctuations and business risks.

### **KIS Active Asset Allocation (AAA)**

The KIS AAA investment portfolio is managed on a discretionary basis by the investment manager. The manager invests in stocks, bonds, mutual funds, ETFs and cash. This is an active management portfolio strategy that rebalances the percentage of assets held in various categories in order to take advantage of market pricing anomalies or strong market sectors. In addition, the manager will sell assets in securities he feels may underperform going forward. This investment program's major risks of loss are market risk, inflation risk and interest rate risk.

### **KIS Global Dynamic Hedge**

KIS Global Dynamic Hedge features allocations to four major asset classes in equity and fixed income that is overlaid by a proprietary risk managed options strategy. This portfolio will be rebalanced as necessary to keep the underlying weightings in line with the original allocations and to keep the options overlay functioning as protection on the major portfolio allocations in the four asset classes. This investment program's major risks of loss are market risk, inflation risk and interest rate risk.

### **KIS Global Macro Trend**

KIS Global Macro Trend's trend following software will adequately position the portfolio with futures and options positioning either long or short. The portfolio is a momentum based trading strategy and while stop losses and other risk measurements are in place, the allocations could leave an investor inversely or "short" positioned against major market indices. This investment program's major risks of loss are market risk, inflation risk and interest rate risk.

### **KIS Multi Strategy Portfolio Series**

KIS Multi-Strat offers a range of diversified positioning through manager style diversification in strategic, active and tactical approaches. This investment program's major risks of loss are market risk, inflation risk and interest rate risk. Considering the diversified nature of these investment portfolios, there is a lesser risk of loss due to currency fluctuations and business risks.

### **KIS Ambassador Income**

KIS Ambassador Income is an alternative to traditional fixed income allocations where more in-depth analysis is performed on interest rate policy and shape and poise of the yield curve to find investments that may be more attractive than conventional bond indices. This investment program's major risk of loss is primarily due to interest rate risk but also is affected by market risk and inflation risk.

### **KIS Blue Chips**

KIS Blue Chips focuses on the goal of picking the best areas of the equity market and avoiding the worst ones via individual stock positions which track company fundamentals. When conditions change with respect to our holdings, new positions are initiated and trades are performed. This investment program's major risks of loss are market risk, inflation risk and interest rate risk.

### **KIS Blue Chips Elite**

KIS Blue Chips focuses on the goal of picking the best areas of the equity market and avoiding the worst ones via a group of concentrated stock positions which track company fundamentals. When conditions change with respect to our holdings, new positions are initiated and trades are performed. This investment program's major risks of loss are market risk, inflation risk and interest rate risk.

### **KIS ProCap**

KIS ProCap uses exchange traded funds to express our opinion on the overall state of the economy through interruption of macroeconomic data points like employment and output. The portfolio seeks to provide opportunistic positioning in equity and other risk assets during economic and market expansions and cash and fixed income during contractions. This investment program's major risks of loss are market risk, inflation risk and interest rate risk. Considering the diversified nature of these investment portfolios, there is a lesser risk of loss due to currency fluctuations and business risks.

### **KIS Sector Alpha**

KIS Sector Alpha portfolio uses macroeconomic data points like employment and output trends from the 10 sectors of the S&P 500 (and their various subsectors) to determine the best areas for investment. The analysis is performed with the goal to pick the best overall sectors of the equity market and avoid the worst ones that are showing least amounts of growth and price appreciation. This investment program's major risks of loss are market risk, inflation risk and interest rate risk.

### **Investment Strategies and Trades Initiated by Clients:**

Strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, futures, and option writing (including covered options, uncovered options or spreading strategies). The investment strategy is developed by the client, with ongoing management advice from the IAR.

The IAR will not offer investment advice on the merits of individual trades chosen by the client. The IAR will help the client understand how the strategy is designed to work; the risk and type of loss associated with each trade and will provide ongoing advice as to how these investments fit into the overall investment portfolio.

### **Commodity Trading Advisor Accounts.**

The investment strategies employed by these investment entities will be explained to the client by the IAR and detailed in the disclosure documents provided by each individual advisor or fund.

These types of programs generally carry a HIGH DEGREE OF RISK and will be described in the disclosure documents supplied by each outside advisor. The IAR will discuss the risks involved in each program with the client before making a referral.

## **Risk of Loss**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors 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 today will not buy as much as a dollar next year, 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 the economic environment.

*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.

KAM's use of short sales, margin transactions, and options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond “fixed income” nature or stock “equity” nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry market conditions and general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary and include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile, and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest, and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

**Real Estate** funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

**Hedge Funds** often engage in leveraging and other speculative investment practices that may increase the risk of investment loss; can be highly illiquid; are not required to provide periodic pricing or valuation information to investors; may involve complex tax structures and delays in

distributing important tax information; are not subject to the same regulatory requirements as mutual funds; and often charge high fees. In addition, hedge funds may invest in risky securities and engage in risky strategies.

**Private Equity Funds:** In addition to the risks associated with hedge funds, there are risks specifically associated with investing in private equity. Capital calls can be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to a total loss of investment.

**Venture Capital Funds** invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

**Private placements** carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

**Commodities** are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

**Options** are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option writing also involves risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

**Non-U.S. securities** present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

A **put** (or “put option”) is an option to sell assets at an agreed price on or before a particular date, and permit investors to hedge an investment they own or speculate in an investment they don’t own (i.e., a naked put). The seller’s potential loss on a naked put can be substantial. If the stock falls all the way to zero (bankruptcy), his loss is equal to the strike price (at which he must buy the stock to cover the option) minus the premium received.

**Index Funds** employ a strategy that aims to replicate the movements of an index of a specific financial market (which may include debt securities), or a set of rules of ownership that are held constant, regardless of market conditions. Products that utilize an index tracking strategy may

suffer a risk of loss, including as a result of tracking error. Imperfect correlation between a portfolio of securities and those in the underlying index, rounding of prices, changes to the underlying index and regulatory requirements may cause tracking error, which is the divergence of the portfolio's performance from that of the underlying index. This risk may be heightened during times of increased market volatility or other unusual market conditions. Tracking error also may result because a portfolio incurs fees and expenses while the underlying index does not.

**Derivatives** gain their value from another instrument and therefore can result in large losses because of the use of leverage, or borrowing. Derivatives allow investors to earn large returns from small movements in the underlying asset's price. However, investors could lose large amounts if the price of the underlying moves against them significantly.

**Inverse ETFs** are designed to produce the inverse returns on a daily basis of whatever index they are tracking. For example, if the S&P 500 were to fall 10% in a given day, an S&P 500 inverse ETF would be up 10% that same day. Because inverse ETFs “reset” daily, their performance over longer periods of time -- over weeks or months or years -- can differ significantly from the performance (or inverse of the performance) of their underlying index or benchmark during the same period of time. This effect can be magnified in volatile markets.

**Leveraged Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Leverage provides additional risk, as any losses sustained will constitute a greater percentage of principal than if leverage had not been employed. Additionally, if losses occur, the value of the account may fall below the lender's threshold thereby forcing the account holder to devote more assets to the account or sell assets on a shorter time frame than desired. Areas of concern for ETFs include the lack of transparency in products and increasing complexity, conflicts of interest, and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

**Publicly traded master limited partnerships (MLPs)** own pipelines, storage tanks, and other cash-generating energy infrastructure and give practically all their income to shareholders in the form of distributions. They are structured differently from typical corporations and operate in a highly technical industry, and in some cases may use management incentive payments that encourage executives to take on more debt, which may increase the risk to investors. Furthermore, because production from shale drilling declines faster than that of crude from traditional wells, the high value and return of MLPs may not be sustained, and investors could lose money.

**Futures contracts** are agreements to buy or sell a specific amount of a commodity or a financial instrument at a particular price on a stipulated future date. Futures trading involves a high amount of leverage, with a relatively small amount of money used to establish a position in assets having a much greater value, and may involve significant losses during a very short period of time.



**Exchange Traded Notes (ETNs)** are unsecured, unsubordinated debt securities that were first issued by Barclays Bank PLC. This type of debt security differs from other types of bonds and notes because ETN returns are based upon the performance of a market index minus applicable fees, no period coupon payments are distributed and no principal protections exists. The purpose of ETNs is to create a type of security that combines both the aspects of bonds and exchange traded funds (ETF). Similar to ETFs, ETNs are traded on a major exchange, such as the NYSE during normal trading hours. However, investors can also hold the debt security until maturity. At that time the issuer will give the investor a cash amount that would be equal to principal amount (subject to the day's index factor). One factor that affects the ETN's value is the credit rating of the issuer. The value of the ETN may drop despite no change in the underlying index, instead due to a downgrade in the issuer's credit rating

**Closed-end funds and business development companies** are registered investment companies, like mutual funds. They carry the risk of capital loss and thus you may lose money. Like mutual funds, they have costs that lower investment returns. They can be of bond “fixed income” nature or stock “equity” nature (mentioned below). They have liquidity risks that mutual funds do not.

**Unit Investment Trusts** will, generally speaking, inherit the risks of the underlying securities, and may not be appropriate for investors seeking capital preservation. Complex UITs are subject to a number of risks that include increased volatility and greater potential for loss, and are not suitable for all investors.

An **American depositary receipt (ADR)** is a negotiable security that represents securities of a non-US company that trades in the US financial markets, which has certain of the same risks as investing directly in non-U.S. securities.

**Non-traded REITs** have additional risks resulting from their relative illiquidity. Furthermore, non-traded REITs typically have higher fees than traditional REITs. Additionally, non-traded REITs lack of mark-to-market pricing, an accounting practice that provides investors with an appraisal of a company's assets at the current market price.

**Multi-strategy funds** engage in a variety of investment strategies. The diversification benefits help to smooth returns, reduce volatility and decrease asset-class and single-strategy risks. Strategies adopted in a multi-strategy fund may include, but are not limited to, convertible bond arbitrage, equity long/short, statistical arbitrage and merger arbitrage.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9 – Disciplinary Information**

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Kingsview Asset Management is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of it or integrity of management.

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

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### **Registration as a Broker/Dealer or Broker/Dealer Representative**

Micahel Bird, Cody Ashton, Brian Smalley, Arrah-Wonah Nester, William Chad Mitton and David Dorsey are a registered representatives of Purshe Kaplan Sterling Investments.

### **Registration as a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor**

KAM has arrangements that are material to its advisory business or its clients with related persons who are a commodity pool operator, commodity trading adviser, Guaranteed Introducing broker for futures or futures commission merchant or an entity that creates or packages limited partnerships. Commodities and Futures are regulated by the National Futures Association (NFA) and the Commodities and Futures Trading Commission (CFTC).

Certain persons associated with KAM are Associated Persons with NFA registered Introducing brokers. These individuals receive usual and customary commissions on futures business that may or may not be related to advice given in connection with investments made at KAM. Certain persons associated with KAM are licensed to sell insurance. These individuals receive usual and customary commissions on insurance sales that may or may not be related to advice given in connection with investments made at KAM.

Specific information on these individuals is can be found in the Supervised Persons Brochure at the end of this document.

### **Registration Relationships Material to the Advisory Business and Possible Conflicts of Interest**

Kingsview Trust and Insurance Services, LLC (KTI): Kingsview Investment Partners the direct owner of KAM, also owns KTI an independent insurance agency. KTI offers fixed insurance products to KAM and non KAM clients through licensed insurance agents. Dually licensed IARs will be paid a commission for the sale of insurance products.

Kingsview Futures, LLC: Mr. Lewis is the sole owner of Kingsview Futures, LLC, an Introducing Futures Broker who has a direct relationship with clients, but delegates the work of the floor operation and trade execution to a Futures Commission Merchant. See Item 12 –Brokerage Practices – Recommendation of Futures Brokerage Firms for more information concerning possible conflicts of interest concerning Kingsview Futures, LLC.

Mr. Lewis is a Partner in Trading Advantage, LLC, an investment education company. Customers may be referred by Trading Advantage to KAM for advisory services. No compensation will be

paid to Trading Advantage by KAM.

Mr. Lewis is a Partner in Advantage Gold, LLC, a precious metals broker. Customers may be referred by Advantage Gold to KAM for advisory services. No compensation will be paid to the Advantage Gold by KAM.

Mr. McGillivray is a Principal with Kingsview Futures, LLC, and an Introducing Futures Broker. Mr. McGillivray receives a salary from Kingsview Futures, LLC. Mr. McGillivray may advise clients of KAM on managed futures as part of an overall investment strategy. Clients will pay a commission on the futures trading to Kingsview Futures, LLC of which Mr. McGillivray will not receive any additional compensation.

Many of the firm's IARs are Associated Persons of either Kingsview Futures, LLC or an unaffiliated Introducing Futures Broker. They may advise clients of KAM on managed futures as part of an overall investment strategy. Clients will pay a commission on the futures trading to Kingsview Futures, LLC or any other futures brokerage. This may present a conflict of interest as the IAR may generate management fees and futures commissions if the client chooses to implement recommendations in the capacity as an futures broker.

Many of the firm's IARs are a licensed insurance agent. They may sell insurance for which he will receive customary compensation. This may present a conflict of interest as the IAR may generate management fees and insurance commissions if the client chooses to implement recommendations in the capacity as an insurance agent. Clients, however, are under no obligation to engage IARs when considering implementation of advisory recommendations.

Michael Bird, Cody Ashton, Brian Smalley, Arrah-Wonah, William Chad Mitton and David Dorsey are registered representatives of Purshe Kaplan Sterling Investments. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. KAM always acts in the best interest of the client, including with respect to the sale of commissionable products to advisory clients. Clients are in no way required to purchase such services or products through any representative of KAM in such individual's outside capacities.

### **Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

KAM may direct clients to third-party investment advisers. KAM will be compensated via a fee share from the advisers to which it directs those clients. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that KAM has an incentive to direct clients to the third-party investment advisers that provide KAM with a larger fee split. KAM will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. KAM will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where KAM is recommending the adviser to clients.

## **Item 11 – Code of Ethics**

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KAM has implemented a Code of Ethics that defines our fiduciary commitment to each client. This Code of Ethics applies to all persons associated with KAM. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our client. KAM and its personnel owe a duty of loyalty, fairness and good faith towards each client. It is the obligation of KAM associates to adhere not only to the specific provisions of the Code but to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures.

KAM has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (312) 870-6701.

### **Recommendations Involving Material Financial Interest**

KAM and its associated persons may have material financial interests in issuers of securities that KAM may recommend for purchase or sale by clients.

This presents a conflict of interest in that KAM or its related persons may receive more compensation from investment in a security in which KAM or a related person has a material financial interest than from other investments. Client approval will be sought for client investment in such recommendations and, if granted, such approval will be binding. KAM always acts in the best interest of the client consistent with its fiduciary duties and clients are not required to invest in such investments if they do not wish to do so.

### **Personal Trading and Conflicts of Interest**

KAM allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of clients. Owning the same securities, we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures.

The Chief Compliance Officer of KAM is Sean McGillivray. He reviews all employee trades each quarter. His trades are reviewed by Scott Martin. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be

recommended to you.

At no time, will KAM or any associated person of KAM, transact in any security to the detriment of any client.

## **Item 12 – Brokerage Practices**

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### **Recommendations of Brokerage Firms**

KAM does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services. The Client will select the broker-dealer or custodian (herein the "Custodian") to safeguard Client assets and authorize KAM to direct trades to this Custodian as agreed in the Investment Advisory Agreement. Further, KAM does not have the discretionary authority to negotiate commissions on behalf of our clients on a trade-by trade basis. Where KAM does not exercise discretion over the selection of the Custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended Custodian and will not incur any extra fee or cost associated with using a broker not recommended by KAM. KAM may recommend a Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the client, and location of the Custodian's offices. KAM does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the client paying higher commissions than those obtainable through other brokers.

KAM typically recommends to Clients that they establish their brokerage account[s] at Interactive Brokers, LLC member FINRA/SIPC/NFA, Charles Schwab, member FINRA/SIPC, or TD Ameritrade, member FINRA/SIPC. Interactive Brokers, LLC, Charles Schwab and TD Ameritrade are independent and unaffiliated FINRA registered broker-dealers. Interactive Brokers, LLC, Charles Schwab and TD Ameritrade offer services to independent investment Advisors, which include custody of securities, trade execution, clearance and settlement of transactions.

KAM receives some benefits from Interactive Brokers, LLC, Charles Schwab and TD Ameritrade through its custodial agreement.

KAM considers a number of factors in selecting and/or recommending brokers and custodians for its Clients' accounts, including, but not limited to, execution capability, experience and financial stability, reputation and the quality of services provided. KAM is not affiliated with, or related to, Interactive Brokers, LLC, Charles Schwab and TD Ameritrade.

1. Soft Dollars - While KAM has no formal soft dollars program in which soft dollars are used to pay for third party services, KAM may receive research, products, or other services from its broker/dealer in connection with client securities transactions ("soft dollar benefits") consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended, and may consider these benefits in recommending brokers. There can be no assurance that any particular client will benefit from any particular soft dollar research or other benefits. KAM benefits by not having to produce or pay for the research, products or services, and KAM will have an incentive to recommend a broker dealer based on receiving research or services. Clients should be aware that KAM's acceptance of soft dollar benefits may result in higher commissions charged to the client.

KAM may enter into soft dollar arrangements through which it may receive research, products, or other services from its broker/dealer or another third-party in connection with client securities transactions (“soft dollar benefits”) within (but not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client’s transactions paid for it, and KAM does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. KAM benefits by not having to produce or pay for the research, products or services, and KAM will have an incentive to recommend a broker dealer based on receiving research or services. Clients should be aware that KAM’s acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage Referrals – KAM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Directed Brokerage – KAM may permit clients to direct it to execute transactions through a specified broker-dealer. Clients must refer to their advisory agreements for a complete understanding of how they may be permitted to direct brokerage. If a client directs brokerage, the client will be required to acknowledge in writing that the client’s direction with respect to the use of brokers supersedes any authority granted to KAM to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

### **Recommendation of Futures Brokerage Firms**

KAM requires advisory clients who employ the services of KAM for transactional futures trading to open an account with Kingsview Futures, LLC, which is owned by Joshua Lewis, who also owns KAM. Kingsview Futures, LLC will charge KAM clients a discounted commission that KAM feels is competitive with other Introducing Brokers. The commission charged by Kingsview Futures, LLC alone or when combined with KAM’s management fee may result in higher execution costs to the client. An Associated Person with Kingsview Futures, LLC will assist the client with opening a futures account with ADM Investor Services, a Self-Clearing Futures Commission Merchant or Gain Capital, a non-clearing Futures Commission Merchant. The IAR will direct the order entry process through a futures broker with Kingsview Futures, LLC. These individuals may be registered with KAM and Kingsview Futures, LLC.

The use of futures accounts is intended to be employed by clients electing KAM’s, Item 8 - “Investment Strategies and Trades Initiated by Clients” Investment Strategy. Kingsview Futures, LLC’s full service commission charge is generally \$35 - \$50 a round turn. Broker assisted discount commissions generally range from \$7 - \$14 a round turn Kingsview Futures, LLC clients will charge KAM clients \$10.40 a round turn in addition to the 2% annual management fee charged by KAM.

The brokerage policy applies to transactional business only and not KAM clients who invest in managed futures programs. See Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss - Investment Strategies - Commodity Trading Advisor Accounts, Third Party Advisors and Private Investment Funds (Private Placements) for the policy on Managed Futures Accounts.

KAM reviews the execution of trades at each custodian each quarter. The review is documented in the KAM Compliance Manual. Trading fees charged by the custodians is also reviewed on a quarterly basis. KAM does not receive any portion of the trading fee.

### **Order Aggregation**

If KAM buys or sells the same securities on behalf of more than one client, it might, but would be under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple Clients in order to seek more favorable prices, lower brokerage commissions or more efficient execution. In such case, KAM would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. KAM would determine the appropriate number of shares to place with brokers and will select the appropriate brokers consistent with KAM's duty to seek best execution, except for those accounts with specific brokerage direction (if any).

## **Item 13 – Review of Accounts**

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Account reviews are performed quarterly by Sean McGillivray, Chief Compliance Officer. Mr. McGillivray considers the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client. Accounts in the KIS managed Portfolios are monitored daily using the firm's account tracking software. Account reviews are performed more frequently when market conditions dictate.

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Clients receive periodic communications on at least an annual basis. Advisory Service Agreement clients, Investment Management clients, and Retainer Agreement clients receive written quarterly updates. The written updates may include a net worth statement, portfolio statement and a summary of objectives and progress towards meeting those objectives.

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

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### **Incoming Referrals**

KAM may enter into referral agreements with third-party advisors under which the third-party advisor pays a fee to KAM for client referrals as permitted by Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended. Third-party advisors have agreed to pay KAM a percentage of the revenue generated from the assets of Clients introduced to the third-party

advisor by KAM. Clients referred to third party advisors will not be charged an amount in addition to the KAM management fee, nor will they be charged a higher management fee than other clients to cover the cost of solicitation of their accounts. KAM doesn't receive any economic benefit other than referral fees.

KAM will research third party advisors to insure they are properly registered and licensed before making any referrals.

Charles Schwab & Co., Inc. Advisor Services provides KAM with access to Charles Schwab & Co., Inc. Advisor Services' institutional trading and custody services, which are typically not available to Charles Schwab & Co., Inc. Advisor Services retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Charles Schwab & Co., Inc. Advisor Services. Charles Schwab & Co., Inc. Advisor Services includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, 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. For KAM client accounts maintained in its custody, Charles Schwab & Co., Inc. Advisor Services generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Charles Schwab & Co., Inc. Advisor Services or that settle into Charles Schwab & Co., Inc. Advisor Services accounts.

Charles Schwab & Co., Inc. Advisor Services also makes available to KAM other products and services that benefit KAM but may not benefit its clients' accounts. These benefits may include national, regional or KAM specific educational events organized and/or sponsored by Charles Schwab & Co., Inc. Advisor Services. Other potential benefits may include occasional business entertainment of personnel of KAM by Charles Schwab & Co., Inc. Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist KAM in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of KAM's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of KAM's accounts. Charles Schwab & Co., Inc. Advisor Services also makes available to KAM other services intended to help KAM manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance and marketing. In addition, Charles Schwab & Co., Inc. Advisor Services may make available, arrange and/or pay vendors for these types of services rendered to KAM by independent third parties. Charles Schwab & Co., Inc. Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to KAM.



KAM is independently owned and operated and not affiliated with Charles Schwab & Co., Inc. Advisor Services.

KAM participates in the institutional advisor program (the “Program”) offered by TD Ameritrade. TD Ameritrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. KAM receives some benefits from TD Ameritrade through its participation in the Program.

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

### **Outgoing Referrals**

As disclosed in the written agreement between Client and KAM, KAM may pay a portion of the advisory fee to a solicitor who referred Client to KAM. Any such referral fee is paid solely from KAM’s investment management fee, and does not result in any additional charge to the client. The solicitor is also required to provide the client with a copy of this disclosure brochure which meets the requirements of Rule 204-3 of the Investment Advisers Act of 1940 and a copy of the solicitor’s disclosure brochure containing the terms and conditions of the solicitation arrangement including compensation. Any affiliated solicitor of KAM is required to disclose the nature of his/her relationship to prospective clients at the time of the solicitation and will provide all prospective clients with a copy of this disclosure brochure at the time of the solicitation. KAM will only engage in solicitor agreements with properly licensed and registered individuals and entities.

## **Item 15 – Custody**

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All assets are held at qualified custodians, which means the custodian provide account statements directly to clients at their address of record at least quarterly. When KAM deducts fees directly from client accounts at a selected custodian, KAM will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by KAM. All clients should review the statements received from the broker-dealer, Futures Commission Merchant or custodian.

## **Item 16 - Investment Discretion**

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KAM accepts discretionary authority by a limited power of attorney signed by the client to manage securities and futures accounts on behalf of clients. A limited power of attorney is a trading authorization for this purpose. KAM has the authority to determine, without obtaining specific client consent, the securities and futures to be bought or sold, and the amount of the securities and futures to be bought or sold. However, KAM consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

Discretionary trading authority facilitates placing trades in client's accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

KAM usually recommends the custodian to be used and the commission rates paid to the custodian. KAM does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

## **Item 17 – Voting Client Securities**

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KAM does not accept proxy voting responsibility for any Client. Therefore, although KAM may provide investment advisory services relative to Client investment assets, KAM Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the Client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. KAM and/or the Client shall correspondingly instruct the Custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. Clients may contact KAM with questions about any solicitations.

## **Item 18 - Financial Information**

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KAM does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because KAM does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

## **Item 19 – Information Security Program**

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KAM is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone 312-870-6701, mail, fax, or by sending an email to [info@kingsviewam.com](mailto:info@kingsviewam.com), or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.