

**Form ADV Part 2A
Investment Advisor Brochure**

Cover Page

Name of Registered Investment Advisor	R.F. Lafferty & Co., Inc.
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This Form ADV Part 2A (Investment Advisor Brochure) gives information about the investment advisor and its business for the use of clients and prospective clients. If you have any questions about the contents of this brochure, please contact us using one of the methods listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Registration is mandatory for all persons meeting the definition of investment advisor and does not imply a certain level of skill or training.

Additional information about our firm is available on the SEC's website at: www.adviserinfo.sec.gov.

1.About RF Lafferty & Co., Inc.

R.F. Lafferty & Co., Inc. ("RFL") is a registered broker/dealer with the Financial Industry Regulatory Authority ("FINRA") and a Registered Investment Adviser ("RIA") in state jurisdictions where applicable. Established in 1946 as a broker/dealer, RFL conducts retail brokerage on a transaction-based service. Commencing in 2006 as an RIA, RFL also provides managed account and financial planning services. Henry Hackel is President of RFL since 1980 and has been in the financial services industry since 1968.

2. MATERIAL CHANGES

Material changes to the ADV Brochure will be provided as a separate document to clients who have received previous versions of brochure. This Brochure is an annual update. The material changes are the increased number investment advisors and the total assets under management by the firm.

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4. ADVISORY BUSINESS

RFL provides management services called ("**RFL Advisor Program**") or "Advisor Program") with RBC Correspondent Services ("RBC") and Pershing acting as "custodian" and offering back office support.

As of March 10, 2017 RFL has \$61,484,000.00 of assets under management. All portfolios are managed on a discretionary basis.

RFL's Investment Advisor Representative ("IA Rep" or "Financial Consultant" in accordance with the Advisor Program Agreement) conducts an initial interview and data-gathering questionnaire to determine the client's financial situation and investment objectives, and to give the client the opportunity to impose reasonable restrictions on the management of the account. Clients have the ability to leave standing instructions with the IA Rep to refrain from investing in particular securities or types of securities, or invest in limited amounts of securities. The IA Rep recommends a portfolio that may consist of stocks, bonds, mutual funds, options, CDs, ETFs, and US government securities. Based on client need, other securities may be considered (e.g., ADRs, foreign equities, warrants, and commercial paper). An asset allocation will be determined at the account set-up. Mutual funds will be offered at net asset value (without sales charge), or may include no load funds.

Quarterly, the IA Rep will notify the client to contact the IA Rep if there have been any changes in the client's financial situation or investment objectives, or to impose or modify account restrictions. The IA Rep will contact or attempt to contact the client periodically but no less than annually on these matters. It is the client's responsibility to notify the IA Rep at any time there are changes. Clients may call in at any time during normal business hours to discuss directly with the IA Rep about the client's account, financial situation, or investment needs. Clients will receive from the custodian/brokerage firm timely confirmations and at least quarterly statements containing a description of all transactions and all account activity. The client will retain rights of ownership of all securities and funds in the account to the same extent as if the client held the securities and funds outside the program. In addition to custodial statements, RFL sends the client quarterly Portfolio Review reports prepared by RBC. The reports are customized at the account set-up. RFL advisory recommends to all clients to review the performance statements along the custodian statement to insure accuracy.

Financial Planning Services consistent with the individual client's tax status as well as their financial risk/reward parameters and personal financial objectives. Planning may focus on investments, insurance planning, taxes, retirement planning, risk management issues, and goal setting including education funding, and/or estate plans. Investment recommendations may consist of stocks, bonds, mutual funds, options, CDs, ETFs, and US government securities. Based on client need, other securities may be considered (e.g., foreign equities, warrants, and commercial paper). Vehicles such as variable life insurance or variable annuities, disability and/or life insurance may also be recommended based on client needs and objectives. The financial plan is only included with the RFL Advisor Program if requested by the client.

Through its investment advisor representatives, RFL provides financial planning, consulting and fee-only investment advisory services to individuals, pension and profit sharing plans, trusts, estates or charitable organizations, corporations or other business entities. No additional fees for these services.

Third Party Advisors

Cedar Capital/Broadmeadow Capital 155 N.Wacker Drive Chicago IL. 60606

Cedar Capital/Broadmeadow Capital uses a diversified strategy designed to achieve long-term growth of principal with a slant toward downside protection. Fulcrum group a subsidiary of RF Lafferty & Co., Inc. exclusively utilizes the Alpha Sector Allocator Premium Global strategy discipline which takes advantage of relative attractiveness of domestic and international equities, fixed income, real estate, gold and governments all through ETF offerings.

Advisors Asset Management, Inc. ("AAM"), 18925 Base Camp Road, Suite 203, Monument, CO80132

AAM offers various strategies from Conservative Taxable, Core Plus Taxable, Credit Opportunities, Mortgage Investment Portfolio, Short Term Tax Exempt, Core Tax Exempt, Peroni Method and High 50 Dividend. Although all of these strategies are available, clients have exclusively selected the Peroni Method. The Peroni Method generally seeks to provide capital appreciation by investing in a portfolio managed based on the Peroni Method; the proprietary, technically-based research strategy of the portfolio manager, Eugene E. Peroni, Jr., utilizing a multi-cap equity strategy, securities may range from value to growth as market conditions change or are anticipated. Cash levels generally do not exceed 20% of the value of the portfolio under regular market conditions.

Broadmeadow Capital LLC 30 S Wacker Suite 1300 Chicago IL 60606

AlphaSector series

These strategies seek to avoid loss and to participate in the market's long-term growth by investing in ETFs primarily equally weighted at rebalancing with a target maximum allocation capped per asset class. As risk increases and ETFs turn 'off', subject to the maximum cap, the proceeds are invested in a Short-term Treasury ETF. Among others, this series includes the Broadmeadow AlphaSector Premium (US sector focus) and Broadmeadow AlphaSector Allocator (global multi-asset class focus) strategies.

Empirical Asset Management Two Newton Executive Park 2227 Washington St, Suite 202 Newton MA 02462

EAM Asset Allocation portfolios are driven by our Rules Based Investing® philosophy and are designed to meet a broad range of investment objectives and risk tolerances. The series consists of five models, with equity exposure and risk increasing as we move from conservative to more aggressive models. Risk Management delivered through diversification both across and within asset classes, combination of active and passive management, and precision asset allocation through targeted ETF holdings, periodic rebalancing to enhance returns and manage risk and a tax conscious approach utilizing ETF investing and tax-sensitive rebalancing.

**State Street Global Advisors One Lincoln Street, Boston, MA 02111-2900.
SSGA Strategic ETF Model Portfolios For RBC Correspondent Services**

RBC Correspondent Services and State Street Global Advisors (SSGA), the investment management arm of State Street Corporation, have joined together to provide sophisticated asset allocation strategies on the RBC platform. SSGA Strategic ETF Model Portfolios, powered by SPDR® ETFs, give you access to a disciplined asset allocation program that can align with their investment strategy. These ETF portfolios seek to provide diversification through a wide range of asset classes that have historically been difficult for individual investors to access.

Strategic Asset Allocation is a core capability of SSGA's Investment Solutions Group and forms the foundation for many services we offer. The investment process for a typical strategic asset allocation begins with return and risk objectives. The portfolio construction process uses long-term asset class return, risk and correlation forecasts to identify an asset allocation that efficiently balances these objectives. These allocations are then carefully refined by our experienced portfolio management team and finalized. We believe the strategic model portfolios highlighted below prudently span the efficient frontier and can be utilized as core allocations by investors with a diverse set of return and risk objectives.

5. FEES AND COMPENSATION

Fees for RFL Advisor Program are computed at an annualized percentage of assets under management on a sliding scale. All fees are negotiable. There are 3 options available;

SCHEDULE A

MANAGED ACCOUNT FEE SCHEDULE

Please select the appropriate option from below:

- **Option 1.** _____ **(Please Initial)**

ASSET TOTAL	ASSET FEE (Maximum Allowable)	FEE TO CLIENT
\$25,000 - \$100,000 *	2.00%	
\$100,001 - \$500,000	1.90%	
\$500,001 - \$1,000,000	1.75%	
\$1,000,001 - \$2,000,000	1.50%	
\$2,000,001 - \$3,000,000	1.25%	
\$3,000,001 - \$5,000,000	1.00%	
\$5,000,001 - \$10,000,000	.75%	
\$10,000,001 and above	Negotiable	

* Minimum advisory account size is \$25,000.

- **Option 2. _____ (Please Initial)**

Note: Minimum rate of \$200/hour to be invoiced quarterly, in arrears, by R. F. Lafferty & Co., Inc.

Hourly Rate: \$_____

- **Option 3. _____ (Please Initial)**

Note: All fees to be invoiced in arrears by R. F. Lafferty & co., Inc.

a. Fixed Fee: \$_____

b. Fixed Fee Billing option: _____ Quarterly

_____ Semi-annually

_____ Annually

For RFL Advisor Program the fee will be payable quarterly in advance. The first payment is due and payable upon execution of the Agreement, and will be assessed pro-rata in the event the Agreement is executed other than the first day of the new calendar quarter. Subsequent payments are due and will be assessed on the first day of each calendar quarter based on the value of the portfolio as of the last day of the previous calendar quarter.

If a financial plan is requested by the client, the fee may be included under the RFL Advisor Program. In almost all cases the cost is inclusive and no additional fees required. If the client requests, the IA Rep will quote a fixed fee ranging from \$1,500 to \$25,000, depending upon the nature and complexity of services, the client's financial situation, and the anticipated time to be incurred. The IA Rep may require the full fee to be paid in advance or a retainer fee (e.g., 50%) to be paid in advance with the balance due on delivery of the written plan. The IA Rep may apply financial planning fees to offset first year fees of the RFL Advisor Program, should the client choose to implement the Program.

These fees are for advisory services only and do not include any transaction fees or commissions, which may be charged separately by the broker/dealers custodial firm. See the section heading Brokerage Practices for more information. Mutual funds are purchased at NAV or no-load, however transaction fees may apply.

Payment of fees may be paid direct by the client, or client may authorize RBC as the custodian holding client funds and securities to deduct RFL advisory fees direct from the

client account as prepared by RBC on behalf of RFL. The custodian will provide periodic account statements to the client. Such statements will reflect all fee withdrawals made on behalf of RFL. It is the client's responsibility to verify the accuracy of the fee calculation.

Fees as published on the fee schedule may be negotiable.

Fees are not collected for services to be performed more than six months in advance.

In addition to fees paid for advisory services with respect to clients' investments in mutual funds, and in accordance with the mutual fund's prospectus, clients pay additional fees on the mutual fund investment because the mutual funds also pay advisory and/or management fees to an investment advisor.

IA Reps of RFL are also Registered Representatives ("RRs") of RFL, a broker/dealer, and as such may receive commission-based compensation for the sale of securities and other investment products. RFL and its IA Reps do not double-dip, and will either receive fee-based compensation or commissions on specified assets. Mutual funds recommended under advisory services will be "no-load" or "load-waived." Client will not pay the advisory fee for mutual funds held in the RFL Advisor Program that were purchased from RFL as a broker/dealer with a front-end sales load until the client has held those shares for at least two years from the date of the initial purchase. In the case where a client invests in a mutual fund, the client may also indirectly pay for the expenses and advisory fees charged by the mutual fund companies in which they invest. Clients are not obligated to purchase investment products recommended, or to purchase through our firm or affiliated firms. RFL's primary business is as a broker/dealer.

For the RFL Advisor Program, services will continue until either party terminates the agreement upon receipt of written notice. If termination occurs prior to the end of a calendar quarter, a pro-rata refund of unearned fees will be made to the client, provided that the minimum annual fee requirement in the amount of \$100.00 has been satisfied. Upon termination of the Agreement, it is solely Client's responsibility to issue instructions regarding disposition of the assets in the account. As of the date of termination, RFL will no longer be the investment advisor of record, and it will be Client's responsibility to monitor the timely disposition of the account and take all future actions in regards to the management of the account.

For financial planning, the client may terminate the Agreement at any time and a refund of the unearned fees, if any, will be made based on time and effort expended before termination. The Agreement for financial planning terminates upon delivery of the plan. When the IA Rep, in writing, confirms with client that the financial plan has been completed, no refunds will be made and payment is due in full.

Termination of Advisory Relationship.

A client agreement may be terminated at any time, by either party, for any reason upon written notice of either party. The client has the right to terminate an agreement without penalty within five (5) business days after entering into the agreement. Clients will receive, where applicable, a prorated refund of any prepaid advisory fees. Additionally, if a client doesn't receive the Brochure Document within 48 hours prior to signing the contract client has (5) business days in which to cancel the contract, without penalty. Any prorated refund will be based upon actual services incurred up to and at the time of termination.

If termination occurs prior to the end of a calendar quarter, a pro-rata refund of unearned fees will be made to the client.

The Advisory Agreement contains a pre-dispute arbitration clause. Client understands that the agreement to arbitrate does not constitute a waiver of the right to seek a judicial forum where such a waiver would be void under the federal securities laws. Arbitration is final and binding on the parties.

General Information about Fees

Fee Calculation

The fee charged is calculated as described above and is not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client (Section 205(a)(1) of the Advisers Act).

Termination of Advisory Relationship.

A client agreement may be terminated at any time, by either party, for any reason upon written notice of either party. The client has the right to terminate an agreement without penalty within five (5) business days after entering into the agreement. Clients will receive, where applicable, a prorated refund of any prepaid advisory fees. Any prorated refund will be based upon actual services incurred up to and at the time of termination.

Mutual Fund Fees

All fees paid to RFL for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without the services of RFL. In that case, the client would not receive the services provided by RFL which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and

objectives. To the extent that client assets are invested in money market funds or cash positions, the fees for monitoring those assets are in addition to the fees included in the internal expenses of those funds paid to their own investment managers, which are fully disclosed in each fund's prospectus. Accordingly, the client should review both the fees charged by the funds and the fees charged by RFL to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Trading and other Costs

All fees paid to RFL for investment advisory services are separate and distinct from transaction fees and/or custodian fees charged by broker dealers associated with the purchase and sale of equity securities and mutual funds. In addition, fees do not include the services of any co-fiduciaries, accountants, brokers or attorneys.

Direct Debiting of Client Accounts

Advisory fees may be directly debited from a client account only if the client provides written authorization permitting RFL's fees to be paid directly from the client's account held by an independent custodian and the custodian agrees to send to the client a statement, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to RFL.

6. PERFORMANCE-BASED FEES and SIDE-BY-SIDE MANAGEMENT

RFL does not charge Performance-Based Fees. RFL does not engage in Side-By-Side Management.

TYPES OF INVESTMENTS

RFL is disclosing those risks and opportunities for basic types of securities used in the Advisor Program. **Investing in securities involves risk and the potential loss.**

- Stock represents ownership in a company. If the company prospers and grows, the value of the stock should increase. Even if a company is **profitable, the stock** prices are subject to "market risk" which is attributable to investor attitudes. Stock ownership in more established companies is more conservative, while younger companies provide the most risk and reward opportunities.
- Debt Securities (corporate or municipal bonds) are basically promissory notes that pay interest and the return of principal at the end of a specified term. Credit risk is the chance the issuer will fail to pay the interest payments on the security or to pay the principal at maturity. Interest rate risk is that the market value of the bonds will go down when interest rates go up. Prepayment risk is the chance that a bond will be paid off early. For example, if interest rates fall, a bond issuer may decide to pay off its debt. When this happens, the investor may not be able to reinvest the proceeds in an investment with as high a return or yield.

- Mutual Fund is an investment pool, which may include money market instruments, stocks, bonds, or other investment vehicles. Professional money managers research, select, and monitor the performance of the securities the fund purchases. It is easier to achieve diversification through ownership of mutual funds rather than through ownership of individual stocks or bonds. Even with no-load or load-waived funds, there are mutual fund expenses paid to the fund company. Investors may have to pay taxes on capital gains distribution received by the fund, but not distributed to the investor. Mutual funds redeem shares at net asset value ("NAV") at the end of the trading day.
- Exchange Traded Fund ("ETF") holds securities to match the price performance of a certain market index or commodity price. ETFs can track stock indexes and sectors, bonds and precious metals. ETFs are subject to the same market risks as the index or sector they are designed to track. ETFs can be bought and sold throughout the day like stocks. ETFs may be an index fund or a fully transparent actively managed fund.

7. TYPES OF CLIENTS

RFL provides advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

RFL sets the initial minimum account size under the RFL Advisor Program at \$50,000. RFL may waive this minimum in its sole discretion; however in no case will the initial minimum account size be below \$25,000.

8 . METHODS of ANALYSIS, INVESTMENT STRATEGIES and RISK OF LOSS

Methods of analysis may include, charting, fundamental, technical, cyclical, or a combination thereof, based on the investment style of the IA Rep. Asset allocation strategies are utilized as well. The IA Rep also evaluates the investments to determine whether they correspond with the client's financial objectives. The IA Rep will design and propose a portfolio to assist the client in achieving his/her financial goals. Some IA Reps may use margin as an investment strategy, whereas other IA Reps may use this strategy based on a client's needs.

By its nature, financial planning looks to the long-term. If a financial plan is provided, the client's short-term cash needs and emergency funds are evaluated first, and then investment and insurance strategies are designed to help the client attain his or her

financial goals. Casualty insurance (e.g. homeowner's, auto, liability, etc.) is reviewed only at the client's request, and would be provided by an outside casualty firm.

While there is risk in all investments, some carry a greater degree of risk or higher costs. There is no guarantee that the investment strategy selected for the client will result in the client's goals being met, nor is there any guarantee of profit or protection from loss. For those investments sold by prospectus, clients should read the prospectus in full.

As a broker/dealer, RFL may buy and sell a variety of investments including but not limited to: stocks, bonds, variable life, term, health and/or disability insurance, variable annuities, mutual funds, US government securities, CDs, ETFs, options, and limited partnerships. As an RIA, under the RFL Advisor Program the investments may be more limited, but can be adjusted based on client need. All transactions will be monitored and reviewed by supervision and required licensing required Finra Exam 65 and/or 66.

RFL is disclosing those risks and opportunities for basic types of securities used in the Advisor Program.

Client assets are managed by both outside managers. AAM/Peroni uses a proprietary method of equity selection developed over two generations and is called Peroni Method. Broadmeadow is a global investment risk avoidance management method monitoring relative strength and volatility. The manager will take any client out an asset whereby they assess any potential risk. The discipline controls and insures the portfolio weighting in any one asset will not exceed 25% other than United States Treasury Bills.

The asset management discipline factors in fundamental as well as technical criteria using tactical asset allocation with an eye toward trend following and monitoring both relative strength and volatility with changes made in keeping with the age, asset base and risk tolerance of each and every client.

9. DISCIPLINARY INFORMATION

An investment advisor must disclose material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or of the integrity of its management personnel. As a state-registered firm, we are required to report an event that is over 10 years old. In 1999, NASD (now FINRA, a self-regulatory organization) fined RFL \$5,000 for supervision violations for failure to establish, maintain, and enforce written supervisory procedures relating to trade reporting and anti-competitive practices in regards to such reporting failures. In 2013, The Firms (AML) Policies, Procedures, and internal controls were not reasonably designed to monitor or detect, the cause and the reporting of suspicious transactions, as required by the rule 3011(A) and rule 3310(A). The firm was fined \$50,000.00. In 2013, SEC rule 10B-10, SEC rules 606, 611(A)(B) AND (C) of regulation NMS, Finra rule 2010, NASD rule 3010 - RFL. failed to provide written notification disclosing to its customers that the transactions were executed at an average price, or erroneously disclosed that the transactions were executed at a average price. The matter was resolved by an executed (AWC) and fined \$22,000.00. In 2015, RFL executed an AWC for a settlement for a fine (5,000.00) related to trade reporting and compliance engine (Trace).

10. OTHER FINANCIAL ACTIVITIES and AFFILIATIONS

RFL's primary business is financial management, of which investment management is a major component. RFL also offers comprehensive financial planning and consulting services. In addition, RFL advisers may be registered representatives of RF Lafferty & Co., Inc. and may be insurance licensed. These advisers may recommend securities and/or insurance products to clients of RFL and may earn reasonable and customary commissions on the sale of such securities and/or insurance products. Comparable insurance products may be available from other sources at a lower price.

IA Reps of RFL are associated with RFL as Registered Representatives. R.F. Lafferty & Co., Inc. is a general securities broker/dealer having membership in the Financial Industry Regulatory Authority. RFL is a diversified financial services company engaged in the design and sale of investment products. We may recommend securities, asset management, or insurance products offered by RFL or its affiliates. If clients purchase these products through us, we will receive the normal commissions or fees associated, but RFL will not "double-dip". Thus, a conflict exists between our interests and those of advisory clients. The client is under no obligation to purchase products recommended, or to purchase products either through us or through RFL.

11. CODE of ETHICS, PARTICIPATION or INTEREST in CLIENT TRANSACTIONS and PERSONAL TRADING

RFL has adopted a Code of Ethics pursuant to Rule 204A-1 of the Investment Advisers Act of 1940, as amended, to prevent violations of federal securities laws. The Code of Ethics is predicated on the principle that RFL owes a fiduciary duty to its clients. Accordingly, RFL expects all employees to act with honesty, integrity and professionalism and to adhere to federal securities laws. All officers, directors, members and employees of RFL and any other person who provides advice on behalf of RFL and is subject to RFL's control and supervision are required to adhere to the Code of Ethics. RFL's Code of Ethics allows the purchase of IPOs or private placements only with prior permission from RFL's Chief Compliance Officer. Clients may request to receive, at no cost, a copy of RFL's Code of Ethics, which contains its policies on employee trading, gifts, and outside business activities. Gifts of nominal value are acceptable, and all employees must disclose any outside business activities generating revenue, which must be approved by RFL's Chief Compliance Officer.

Employee Trading Policy

From time to time, RFL may recommend to clients that they purchase or sell specific securities or investments in which RFL or its related personnel have some financial interest. In addition, RFL or individuals associated with RFL may buy, sell, or hold in their personal accounts the same securities that RFL recommends to its clients and in accordance with its internal compliance procedures. Such trades will occur simultaneously with or after trades placed on behalf of clients.

Occasionally, investment objectives of clients are similar to that of RFL's IA Reps, accordingly, this may lead to personal investments made in the same securities that are recommended to clients. However, RFL will always place the interests of clients ahead of RFL and its employees. RFL's policy is designed to avoid conflicts of interest with our clients and we will not violate the Advisor's fiduciary responsibilities to our clients.

Participation or Interest in Client Transactions

RFL, as a broker/dealer is engaged in the investment banking business and market making. Advisory and brokerage clients are limited from purchasing the stocks of companies while RFL has current investment banking activity with the company, as these stocks will be placed on the restricted list and no recommendations of these securities may be made. RFL Brokerage Clients may purchase these securities on an unsolicited basis during the investment banking period. If an RFL advisory client wishes to purchase a new issue security, the firm will not take compensation (selling concession) on the transaction. The stocks of these companies may be recommended to advisory and brokerage clients after the investment banking activity has ceased.

General securities transactions

To minimize conflicts of interest, and to maintain the fiduciary responsibility RFL has for its clients established the following policy: An officer, director, or employee of RFL shall not buy or sell securities for a personal portfolio when the decision to purchase is substantially derived, in whole or in part, by reason of employment with RFL, unless the information is also available to the investing public on reasonable inquiry. No person associated with RFL shall prefer his or her own interest to that of any client. Personal trades in securities being purchased or sold for clients may be effected simultaneously with or after trades are effected for clients. RFL personnel may not anticipate trades to be placed for clients. The client will always receive the best executed price available at the time of trading.

Principal Trades

RFL, as a broker/dealer acts as a market maker. RFL does enter into riskless principal trades with brokerage client accounts. RFL does not enter into any principal trades with advisory accounts.

Agency Cross Transactions

RFL does not enter into any agency cross trades with advisory accounts.

Investment Management Services Reviews

While the underlying securities within Investment Management Services accounts are continuously monitored, these accounts are reviewed no less frequently than annually. Accounts are reviewed in the context of each client's stated investment objectives and guidelines, ensuring that the structure of the portfolio is coordinated with these objectives.

12. Brokerage Practices

It is the objective of RFL to provide a means of allocating trading and investment opportunities between advisory clients on a fair and equitable basis and in compliance with all applicable state and federal guidelines. With respect to clients' accounts with substantially similar investment objectives and policies, RFL may often seek to purchase or sell a particular security in each account. RFL will aggregate orders only when such

aggregation is consistent with RFL's duty to seek best execution and is consistent with the investment objective of each client. No client account will be unfairly favored over any other account.

Each client that participates in an aggregated order will participate based on the average execution price in that particular security. All transaction costs will be allocated *pro rata* based on each client's participation in the transaction. All securities purchased or sold, whether the order is filled completely or partially, will then be allocated *pro rata* based on the assets of each account.

Selection or recommendation of broker/dealers

Because IA Reps are RRs with RFL, if clients freely choose to implement advice through us, the broker/dealer is RFL. Under FINRA supervision rules, compliance monitoring is more efficient by using RFL but required.

RFL performs "due diligence" on mutual funds, limited partnerships, and insurance products. Only those investments that meet firm requirements will be on RFL's "approved product list" and be offered for sale to clients.

RFL does not have the incentive to select or recommend a broker/dealer based on its interest in receiving client referrals.

Certain clients may direct RFL to use particular brokers for executing transactions in their accounts. To the extent brokerage transactions are placed with particular broker dealers for execution as directed by a client, RFL's ability will achieve best execution available. Clients who direct RFL to use particular broker dealers may pay higher commissions than those that do not. RFL reserves the right to decline acceptance of any client account that directs the use of a broker dealer other than RF Lafferty & Co., Inc., if RFL believes that the broker dealer would adversely affect RFL's fiduciary duty to the client and/or ability to effectively service the client portfolio.

Soft Dollar Practices

RFL does not receive compensation or benefits in the form of "soft dollars" for research, products and/or other services on investment advisory accounts.

13. Review of Accounts and Reports

RFL Advisor Program: Each IA Rep is responsible to review accounts under his/her supervision. The review may be done on a daily basis but no less than monthly. Changes can occur in the portfolio at any time based on fundamental news regarding the economy, client investments, and/or performance. A more comprehensive account review is done, on a quarterly basis with an eye towards the asset allocation. Based on the IA Rep's

philosophy and the client's investment objectives, some portfolios will be more actively traded and other securities will be held for the long term.

In addition, investment returns will be measured against the appropriate benchmarks in each asset class. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

Reports

Clients will receive statements at least quarterly. Additionally, monthly statements will be generated as a result of investment activity by the client's separate custodian. Confirmation statements will be issued for all trading activity. Monthly and/or quarterly statements will include portfolio holdings, dates and amounts of transactions, and current and prior statement values. It's recommended to clients to review the custodian confirms and statements vs. the quarterly reports to insure consistency and accuracy.

Financial Planning Reviews

Financial plans are designed by client request. Financial plans do not receive any scheduled review or reports, except as re-engaged by the client. The IA Rep suggests that clients meet with the IA Rep annually for reviews. Financial Planning Services terminate upon the delivery of services. While the advice may include the recommendation for a review or follow-up services, it is the client's obligation to secure additional or follow-up services with the IA Rep at the client's discretion.

These client accounts will be reviewed as contracted for at the inception of the advisory relationship.

Under the RFL Advisor Program, clients will receive a quarterly report, which will include at a minimum commentary, portfolio summary, and portfolio allocation comparison. The report design may include other pages and will be designated by the client at the account set-up. The IA Rep can also prepare post-meeting communications and financial planning documents upon request or at the IA Rep's discretion. It's recommended to clients to review the custodian confirms and statements vs. the quarterly reports to insure consistency and accuracy.

Management Reports

All client accounts are reviewed by the Branch Office Managers of RFL various office locations, and is reviewed by compliance staff and principals of the firm.

14. CLIENT REFERRALS and OTHER COMPENSATION

RFL does not directly or indirectly receive or give any economic benefit for providing investment advice or other advisory services to our clients from or to anyone other than our clients.

Client Referrals & Other Compensation

Referral Fees Paid

RFL does not pay finders (solicitors) fees.

Referral Fees Received

RFL may offer various platforms or investment strategies based on client objectives; Resource II and/or Total Strategy Cedar Capital, Sate Street and other platforms that are sponsored by RBC.

Sales Awards

RFL in its capacity as a broker/dealer may receive incentive awards from mutual fund companies. All allowable compensation is disclosed in the mutual fund prospectus. Commission rates are set by each fund, and clients do not pay up for the additional compensation. RFL may also receive additional compensation on stocks, bonds, partnerships, and insurance, as may be applicable in the normal course of running a securities brokerage business.

Advice offered by IA Reps in their capacity as RRs of RFL or agents of insurance companies, may involve investments in mutual funds, variable insurance or variable annuities, which pay commissions (including 12(b)-1 fee "trails" or other compensation) from the respective product sponsor. All allowable compensation is disclosed in the prospectus.

Referrals & Other Compensation

Referral Fees Paid

RFL does not pay finders (solicitors) fees.

15. CUSTODY

RFL does not have authority to withdraw funds or to take custody of client funds or securities. RBC as custodian maintains client funds and securities and is responsible for calculating and deducting advisory fees on behalf of RFL.

16. INVESTMENT DISCRETION

RFL may requests that it be provided with written discretionary authority to determine the amounts of securities that are bought or sold. Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change or amend these limitations as required. All such amendments shall be submitted in writing. When authorized by the client, RFL generally has discretionary authority to make the following determinations without obtaining the consent of the client before the transactions are effected: (1) which securities are bought and sold for the account and (2) the total amount of securities to be bought and sold. RFL's authority in making investment related decisions may be limited by account guidelines, investment objectives and trading restrictions, as agreed between RFL and the client. RFL without discretion cannot perform automatic rebalancing, without prior consent to each and every transaction.

17. VOTING CLIENT SECURITIES

RFL does not vote proxies on behalf of its clients. Therefore, although RFL may provide investment advisory services relative to client investment assets, RFL's 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 proceeding or other type events pertaining to the client's investment assets. RFL and/or the client shall correspondingly instruct each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. The client may contact RFL for additional information as relates to the proxy voting.

18. FINANCIAL INFORMATION

Prepayments

RFL does not require or solicit prepayments of more than \$500 in fees per client, six months or more in advance.

Financial Condition

An investment advisor must provide financial information if a threshold of fee prepayments is met; there is a financial condition likely to impair the ability to meet contractual

commitments; or, a bankruptcy within the past ten years. RFL does not have any disclosure items in this section.

Bankruptcy

RFL has not ever been subject to a bankruptcy.

19. REQUIREMENTS FOR STATE ADVISORS

RFL advisers must pass and maintain the appropriate licensing requirement and registration. To be an RIA you must have a FINRA Exam Series 63 & 65 and/or Series 66 or a professional designation that allows you to conduct RIA business. Licensed insurance agents will only offer services to clients residing in states in which the agent is registered.

Disclosures

Some RFL advisers may have disclosure information. The adviser will provide a Supplemental Disclosure to all potential clients. In addition, the Supplemental Disclosure will be provided upon request.

There are no disclosures of material facts related to arbitration or disciplinary actions involving the management person.

There are no material relationships maintained by the advisory business or management persons with the issuer of securities.

EDUCATION AND BUSINESS STANDARDS

Persons associated with RFL who provide investment advice to clients are required to have a requisite licensing and qualifications, including several years of investment experience or general business experience. Each IAR must also be registered in each State in which they provide advisory services.

Officers of RIA BIOGRAPHICAL INFORMATION

Management and Supervision

Education and Business Background

Name: **Robert Hackel CCO Investment Adviser**
 Ownership: N/A
 Year of Birth: 1972
 Education: Pace University, NY, BA, Finance, 1994
 Background: R.F. Lafferty & Co., Inc., NY, NY, Chief Operating Officer/Chief Compliance Officer RIA, 12/1996 - Present

No reported disclosures

Name: **Henry Hackel CEO Broker Dealer/President Of RIA**
 Ownership: 75% or more
 Year of Birth: 1943
 Education: City College of New York, NY, BBA 1965
 Brooklyn Law School, NY, JD 1968
 Background: R.F. Lafferty & Co., Inc., NY, NY, President/Chief Compliance Officer BD, 1968-present
 Pro-Ex LLC, NY, NY, President, 9/2000 – 01/2008
 Harbor Capital Management, Stanford, CT, General Partner, 10/1991 –9/05

No reportable disclosures

Form ADV Part 2B
 Brochure Supplement

Name of Registered Investment Advisor	R.F. Lafferty & Co., Inc. ("RFL")
Address	40 Wall Street 19th Floor, New York, NY 10005
Phone Number	212-293-9090
Website Address	www.rflafferty.com

Name of Supervised Person/IA Rep	Robert "Rob" Hackel
Date of Last Revision	March 10th, 2017

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Educational Background and Business Experience

Education and Business Background

Name: **Robert ("Rob") Hackel**

Year of Birth: 1972

Education: Pace University, NY, BA, Finance, 1994

Business: R.F. Lafferty & Co., Inc., NY, NY, Vice-President/Chief Compliance Officer RIA,
12/1996 - Present

Disciplinary Information

Rob Hackel does not have any disclosure items.

Other Business Activities

Rob Hackel is in the business of selling securities and insurance as fully disclosed in ADV 2A. He does not have any other outside business activities.

Additional Compensation

All fee, commission, trail commissions, and sales awards are paid through RFL as fully disclosed in ADV 2A. Mr. Hackel does not receive any additional compensation.

Supervision

Rob Hackel formulates his own investment advice. As the RIA Chief Compliance Officer, he is responsible for supervision of advisory activities. Compliance staff will monitor Mr. Hackel's trading. Rob Hackel reports to Henry Hackel, the president of the firm. Henry Hackel may be contacted at the phone number of the main office as shown on the cover page. All disclosure items about the IA Rep are included in the ADV 2B supplemental brochure.

Requirements for State-Registered Advisers

The supervised person has **NOT** been involved in one of the events listed below;
An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500.

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding

The subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

Form ADV Part 2B

Brochure Supplement

Name of Registered Investment Advisor	R.F. Lafferty & Co., Inc.
Address	40 Wall Street 19th Floor, New York, NY 10005
Phone Number	212-293-9090
Website Address	www.rflafferty.com

Name of Supervised Person/IA Rep	Michael J Bartolotta
Date of Last Revision	March 10th, 2017

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Educational Background and Business Experience

Name: **Michael Bartolotta**

Year of Birth: 1964

Mr. Michael Bartolotta is located;
333 Westchester Ave

White Plains NY 10604
914-220-9900

Michael Bartolotta, born in 1964, is Independent Contractor located at 333 Westchester Ave. White Plains NY 10604. Mr. Bartolotta's primary focus is developing relationships with companies that utilize ADP for their 401(k) services.

Prior to joining RF Lafferty in 10/2015 Mr. Bartolotta was a Financial Advisor for Fulcrum Securities & Fulcrum Advisory Services 9/2009-3/2016, responsible for developing relationships with ADP clientele

He is also a Chartered Retirement Planning Counselor SM (CRPC) certified from the College For Financial Planning.

Mr. Bartolotta is FINRA Series 6, 7 and 66 registered with RF Lafferty & Co., Inc.

Disciplinary Information

Mr. Bartolotta has events to disclose. Clients may view his history of any criminal or disciplinary events and any customer complaints on the Investment Adviser Public Disclosure site using his name or CRD #4450916.

Other Business Activities

Mr. Bartolotta no outside business activity.

Additional Compensation

Mr. Bartolotta does not receive any additional compensation beyond his commissions and fees earned for providing advisory services.

Supervision

Robert Hackel is responsible for supervising Mr. Bartolotta. Mr. Hackel can be reached at 212-293-9074.

Requirements for State-Registered Advisers

The supervised person has **NOT** been involved in one of the events listed below;
An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500.

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding The subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

Form ADV Part 2B
Brochure Supplement

Name of Registered Investment Advisor	R.F. Lafferty & Co., Inc.
Address	40 Wall Street 19th Floor, New York, NY 10005
Phone Number	212-293-9090
Website Address	www.rflafferty.com

Name of Supervised Person/IA Rep	William Dipence
Date of Last Revision	March 10th, 2017

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Educational Background and Business Experience

Name: **William Dipence**
Year of Birth: 1951

Mr. William Dipence is located;
333 Weschester Ave
White Plains NY 10604
Phone: (800) 783-1343

Business Experience Employment

Mr Dipenice has over 30 years in the financial industry and has been with RF Lafferty from 07/2016 and has worked with John Hancock 4/80 -3/95, HSBC Brokerage 3/95 - 12/02, Quick & Reilly 2/02 - 5/03, Capital Brokerage 06/03 -1/04, Terra Securities Corp 1/04-11/04, Met Life Securities 11/04 -06/06 , Chase Investment Services 06/06 -06/12 and Wells Fargo Advisers 06/12 to 7/16 prior to joining RF Lafferty.

Mr. Dipenice is FINRA Series 6, 7, 26, 63 and 66 registered with RF Lafferty.

Disciplinary Information

None

Other Business Activities

PGB Energy Inc. Supply Natural Gas and Electric conversions to commercial properties. Home office sales.--Non-financial sales position.

Supervision

Robert Hackel is responsible for supervising Mr. Dipenice. Mr. Hackel can be reached at (212-293-9074).

Requirements for State-Registered Advisers

The supervised person has **NOT** been involved in one of the events listed below;
An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500.

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The subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

Form ADV Part 2B
Brochure Supplement

Name of Registered Investment Advisor	R.F. Lafferty & Co., Inc.
Address	40 Wall Street 19th Floor, New York, NY 10005
Phone Number	212-293-9090
Website Address	www.rflafferty.com

Name of Supervised Person/IA Rep	Louis J. Ciavarella
Date of Last Revision	March 10th, 2017

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Educational Background and Business Experience

Name: **Louis J. Ciavarella**
Year of Birth: 1950
Investment adviser with RF Lafferty located;
150 North Radnor Chester Road
Suite F-200
Radnor, PA 19087
Phone: (877) 301-9988

Mr. Ciavarella started his financial career with 6/2009 Smith Barney in Berwyn, Pennsylvania. He assisted clients develop strategies for portfolio construction, provided investment advice and estate planning. Smith Barney later merged with Morgan Stanley and became Morgan Stanley Smith Barney. Prior to Smith Barney, Mr. Ciavarella held positions in marketing, program management and sales management in the information service

business of Unisys, a Fortune 500 company. Mr. Ciavarella has been a registered investment advisor with Fulcrum Securities since February 2012 to February 2016.

Mr. Ciavarella earned a Bachelor of Art degree in Marketing from Michigan State University.

Disciplinary Information

None

Other Business Activities

Mr. Ciavarella is FINRA Series 7 & 66 registered with RF Lafferty.

Additional Compensation

Mr. Ciavarella does not receive any additional compensation beyond his commissions and fees earned for providing advisory services.

Supervision

Robert Hackel is responsible for supervising Mr. Ciavarella. He can be reached at 212-293-9074.

Requirements for State-Registered Advisers

The supervised person has **NOT** been involved in one of the events listed below;

An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500.

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding

The subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

Form ADV Part 2B
Brochure Supplement

Name of Registered Investment Advisor	R.F. Lafferty & Co., Inc.
Address	40 Wall Street 19th Floor, New York, NY 10005
Phone Number	212-293-9090
Website Address	www.rflafferty.com

Name of Supervised Person/IA Rep	Janice Arrott Ginsburg
Date of Last Revision	March 13th, 2016

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Educational Background and Business Experience

Name: Janice Arrott Ginsburg
Year of Birth: 1950

Janice Arrott Ginsburg, is an investment adviser with RF Lafferty located;
150 North Radnor Chester Road
Suite F-200
Radnor, PA 19087
Phone: (877) 301-9988

Education:

University of Miami in Coral Gables, FL, Bachelor of Education and Mathematics, 1971
Florida Atlantic University in Boca Raton, FL, Education Administration, 1975

Business Background:

Fulcrum Securities, LLC, First Vice President, Wealth Management, 2/2012 to 2/2016
Janney Montgomery Scott LLC, Vice President, Wealth Management, 8/1989 to 2/2012
Thomson McKinnon Securities, Inc., Registered Representative, 2/1984 to 8/1989
Merrill Lynch, Registered Representative, 11/1981 to 2/1984

Ms. Ginsburg was awarded the designation of Certified Financial Planner CFP®

The awarded designation was obtained through extensive training and testing. This advisor is held to the highest ethical standards along 30 hours annually of Continuing education.

Disciplinary Information

None

Other Business Activities

Ms. Ginsburg is FINRA Series 7, 63 registered with RF Lafferty. Ms. Ginsburg is a member of the Financial Planning Association of the Philadelphia Tri-State Area.

Additional Compensation

Ms. Ginsburg does not receive any additional compensation beyond his commissions and fees earned for providing advisory services.

Supervision

Robert Hackel is responsible for supervising Ms Ginsberg. Mr. Hackel can be reached at 212-293-9074.

Requirements for State-Registered Advisers

The supervised person has **NOT** been involved in one of the events listed below;
An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500.

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding

The subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

Form ADV Part 2B

Brochure Supplement

Name of Registered Investment Advisor	R.F. Lafferty & Co., Inc.
Address	40 Wall Street 19th Floor, New York, NY 10005
Phone Number	212-293-9090
Website Address	www.rflafferty.com

Name of Supervised Person/IA Rep	Stephen N. Moss, Jr.
Date of Last Revision	March 10, 2017

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Educational Background and Business Experience

Education and Business Background

Name: Stephen J. Moss

Year of Birth: 1968

Stephen J. Moss, is an investment adviser with RF Lafferty located;
150 North Radnor Chester Road
Suite F-200
Radnor, PA 19087
Phone: (877) 301-9988

Mr. Moss has been employed in the securities industry since 8/2004. He completed training with AXA Equitable as a registered representative in 10/ 2004 - 10/2008. Prior to joining RF Lafferty he was employed with Fulcrum Securities (July 2013 - Feb 2016), Woodbury

Financial Services, Inc. from December 2008-July 2013. Mr. Moss attended Delaware County Community College where he earned an Associate Degree in Natural Sciences. He continued his education at the University of South Florida in Tampa as genetics major and finally transferred to Drexel University working towards a degree in mathematics.

Disciplinary Information

Mr. Moss has events to disclose. Clients may view his history of any disciplinary events and any customer complaints or judgment liens on the Investment Adviser Public Disclosure site using his name or CRD #4849568.

Other Business Activities

Mr. Moss is FINRA Series 7 & 66 licensed with RF Lafferty.

Mr. Moss is also the principal and 100% owner of Moss Insurance Group, Inc., a Pennsylvania Corporation and licensed insurance agency. He currently devotes 25 hours per month, zero of which is during trading hours, to this business. Mr. Moss is holds Life, Accident and Health Insurance licenses in PA, NJ, NY, MD, NC, and FL. Mr. Moss also works at Overbrook Golf Club.

Additional Compensation

As a licensed insurance agent, Mr. Moss may receive additional compensation beyond his fees and commissions earned for providing advisory services.

Supervision

Robert Hackel is responsible for supervising Mr. Moss. Mr. Hackel can be reached at 212-293-9074.

Requirements for State-Registered Advisers

The supervised person has **NOT** been involved in one of the events listed below;
An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500.

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding. The subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

Form ADV Part 2B

Brochure Supplement

Name of Registered Investment Advisor	R.F. Lafferty & Co., Inc.
Address	40 Wall Street 19th Floor, New York, NY 10005
Phone Number	212-293-9090
Website Address	www.rflafferty.com

Name of Supervised Person/IA Rep	Van D. Olmstead, Jr.
Date of Last Revision	March 10th, 2017

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- Compliance if you did not receive RFL's brochure or if you have any questions about the contents of this supplement. Additional information about IA Reps is available on the SEC's website at: www.adviserinfo.sec.gov

Educational Background and Business Experience

Education and Business Background

Name: Van D. Olmstead

Year of Birth: 1943

Van D. Olmstead, is an investment adviser with RF Lafferty located;
150 North Radnor Chester Road
Suite F-200
Radnor, PA 19087
Phone: (877) 301-9988

Mr. Olmstead is responsible for providing investment advisory services and brokerage services to individual and institutional clients seeking professional advice. Mr. Olmstead was awarded a Bachelor of Arts Degree by West Chester University in 1969. He attended Delaware Law School of Widener University and the University of Delaware.

Mr. Olmstead was awarded the designation of Certified Financial Planner (CFP®) in 1990 and the designation of Accredited Wealth Management Adviser (AWMA®) in 2006. Mr. Olmstead has been employed in the securities industry since September of 1973. He completed training with White, Weld, Inc. as a representative registered in December of 1975 when he

passed the Series 7 a New York Stock Exchange examination. Prior to joining RF Lafferty, he was employed with Fulcrum Securities 9/2010-1/2016, Janney Montgomery Scott of Philadelphia from 5/2001-9/2010 and Legg Mason 1/1989-5/2001.

Disciplinary Information

None

Other Business Activities

Mr. Olmstead is FINRA Series 4, 7, 24 and 79 registered with RF Lafferty.

Mr. Olmstead is the President of the Kiwanis Club of Wilmington, DE.

Mr. Olmstead is the Vice President and a board member of the Kiwanis Foundation of Wilmington, Inc. in West Chester, PA.

Mr. Olmstead is a member of the Board of Trustees for Congregation Beth Emeth in Wilmington, DE.

Moss Insurance as a sales agent

Additional Compensation

Mr. Olmstead does not receive any additional compensation beyond his commissions and fees earned for providing advisory services.

Supervision

Robert Hackel is responsible for supervising Mr. Olmstead. Mr. Hackel can be reached at 212-293-9034

Requirements for State-Registered Advisers

The supervised person has **NOT** been involved in one of the events listed below;

An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500.

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding

The subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

Brochure Supplement

Name of Registered Investment Advisor	R.F. Lafferty & Co., Inc.
Address	40 Wall Street 19th Floor, New York, NY 10005
Phone Number	212-293-9090
Website Address	www.rflafferty.com

Name of Supervised Person/IA Rep	Charles Lawrence
Date of Last Revision	March 10th, 2017

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Educational Background and Business Experience

Name: **Charles Lawrence**
Year of Birth: 1965
Investment adviser with RF Lafferty located;
3980 Tampa Road Suite 202
Oldsmar FL 34677
Phone: (813) 518-0170

Old Dominion University
B.S. Criminal Justice 05/09/1987
Minors Political Science/ History

Mr. Lawrence started his financial career with Morgan Stanley on 09/1998 to 03/2016. Mr. Lawrence has been a registered investment advisor with RF Lafferty April 2016.

Mr. Lawrence is FINRA Series 7, 31, 63 and 65 registered with RF Lafferty & Co., Inc.

Disciplinary Information

Mr. Lawrence has an event to disclose. Clients may view his history of any criminal or disciplinary events and any customer complaints on the Investment Adviser Public Disclosure site using his name or CRD #3131566.

Other Business Activities

Mr. Lawrence has no outside business activities.

Additional Compensation

Mr. Lawrence does not receive any additional compensation beyond his commissions and fees earned for providing advisory services.

Supervision

Robert Hackel is responsible for supervising Mr. Lawrence. Mr. Hackel can be reached at 212-293-9074.

Requirements for State-Registered Advisers

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An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500.
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The subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.