

# **L.M. Kohn & Company Advisory Brochure**

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December 1, 2018

## **Part 2A of Form ADV**

This Brochure provides information about the qualifications and business practices of L.M. Kohn & Company [LMK]. If you have any questions about the contents of this Brochure, please contact us at 513-792-0301 or [comment@lmkohn.com](mailto:comment@lmkohn.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.

LMK is a Registered Investment Adviser firm. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about LMK is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with LMK who are registered, or are required to be registered, as investment adviser representatives of LMK.

(Cover Page – Item 1)

Brochure Supplement  
L.M. Kohn & Company

## Material Changes (Item 2)

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### Annual Update

The Material Changes section of this brochure will be updated at least annually or when material changes occur since the previous release of the Firm Brochure.

Pursuant to SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

The entire brochure is available on our website, [www.lmkohn.com](http://www.lmkohn.com), under Form ADV/Privacy Notice. If you do not have access to the internet and would like to receive a complete copy of the brochure, please contact Andrew Kohn, Vice President of Compliance, at 513-792-0301 or [compliance@lmkohn.com](mailto:compliance@lmkohn.com). **If you would like to receive future updates by email instead of by mail, please send your request and email address to [compliance@lmkohn.com](mailto:compliance@lmkohn.com).**

### Material Changes since 12/01/2017.

None

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Education and Business Standards of the Investment Advisor Representatives are separately listed for each branch office. Clients will receive the supplement for their Investment Advisor Representative. The entire brochure is available on our website, [www.lmkohn.com](http://www.lmkohn.com), under Form ADV/Privacy Notice. If you do not have access to the internet and would like to receive a complete copy of the brochure, please contact Kristin Hobbs, Manager of Advisory Relations at 513-792-0301 ext. 112 or [kristinh@lmkohn.com](mailto:kristinh@lmkohn.com).

#001 ..... 10151 Carver Rd. Suite 100  
..... Cincinnati, OH 45242  
..... Doing Business As: L.M. Kohn & Company

#001 ..... 2229 Packard Street Suite 3  
..... Ann Arbor, MI 48104  
..... Doing Business As: Ann Arbor Center for Financial Services LLC.

#001 ..... One West Court Square, Suite 750  
..... Decatur, GA 30030  
..... Doing Business As: Art Rosser Financial Services Group

#001 ..... 14806 Floyd  
..... Overland Park, KS 66223  
..... Doing Business As: A. Turner Financial, LLC.

#001 ..... 300 Congress Suite 104  
..... Quincy, MA 02169  
..... Doing Business As: Butler Benefit Brokers, Inc.

#001 ..... 4965 U.S. Highway 42 Suite 1000 ....  
..... Louisville, KY 40222  
..... Doing Business As: Carpenter Wealth Management

#001 ..... 171 Londonderry Turnpike  
..... Hooksett, NH 03106  
..... Doing Business As: CGI Wealth Management

#001 ..... 300 Church Street  
..... LaGrange, GA 30240  
..... Doing Business As: Charter Investment Services

#001 ..... 18 North Fort Thomas Ave. Suite 107  
..... Fort Thomas, KY 41075  
..... Doing Business As: Citizens Financial Services

#001/#020 ..... 10151 Carver Rd. Suite 100.  
..... Cincinnati, OH 45242  
..... Doing Business As: Cyr Financial Services / Sharefax Financial Services

#001 ..... 210 East Drinker Street.  
..... Dunmore, PA 18512  
..... Doing Business As: Conway Financial Group

#001 ..... 727 N. Waco Suite 270  
..... Wichita KS 67203  
..... Doing Business As: Dave Stalker Financial Group

# 001 ..... 70 West 40<sup>th</sup> St. 8<sup>th</sup> Floor  
..... New York, NY 10018  
..... Doing Business As: Gelman Pension Consulting Inc.

#001 ..... One Sheakley Way.  
..... Cincinnati, OH 45246  
..... Doing Business As: Group Plans Insurance Agency, Inc., a Division of Sheakley

#001 ..... 4350 Brownsboro Rd. Suite 110  
..... Louisville, KY 40207  
..... Doing Business As: JLA Capital LLC.

#001 ..... 6200 West 9<sup>th</sup> St. Unit 3  
..... Greeley, CO 80634  
..... Doing Business As: L.M. Kohn & Company

#001 ..... 1000 N. Magnolia Ave.  
..... Orlando, FL 32803  
..... Doing Business As: L.M. Kohn & Company

#001 ..... 6132 Dorsett Place  
..... Wilmington, NC 28403  
..... Doing Business As: L.M. Kohn & Company

#001 ..... 2150 Butterfield Dr. Suite 200  
..... Troy, MI 48084  
..... Doing Business As: LM Kohn North

#001 ..... 3710 N. Ridgewood Suite D  
..... Wichita, KS 67220  
..... Doing Business As: Preferred Pension Solutions

#001 ..... 300 E. Bremer Ave. Suite 220  
..... Waverly, IA 50677  
..... Doing Business As: Paradigm Benefits, LLC

#001 ..... 2229 Packard Street Suite 3  
..... Ann Arbor, MI 48104  
..... Doing Business As: Pilot Wealth Management

#001 ..... 70 W. Franklin St. Suite D.  
..... Centerville, OH 45459  
..... Doing Business As: Private Wealth & Retirement Services, Inc.

#001 ..... 50 Energy Dr. Suite 201  
..... Canton, MA 02021  
..... Doing Business As: Qualified Pension Services, Inc.

#001 ..... 212 East Drinker Street, Suite C  
..... Dunmore, PA 18512  
..... Doing Business As: Robert Bryan Fitzpatrick, P.C.

#001 ..... 9200 Montgomery Rd. Suite 9A  
..... Cincinnati, OH 45242  
..... Doing Business As: SureVest Financial, Inc.

#001 ..... 2205 Trautner Drive Suite 201  
..... Saginaw, MI 48604  
..... Doing Business As: Tanke Financial Group, LLC

#001 ..... 4880 36<sup>th</sup> Street NE Suite 203.  
..... Grand Rapids, MI 49512  
..... Doing Business As: The Tatlan Group

#001 ..... 2755 Juniper Ct.

.....Troy, MI 48098  
.....Doing Business As: True Harbour Wealth Management

#001 .....7961 Washington Woods Dr.  
.....Dayton, OH 45459  
.....Doing Business As: Vision Financial Partners

#005 .....2794 Mack Rd.  
.....Fairfield, OH 45014  
.....Doing Business As: Lighthouse Agency Inc.

#009 .....Towers of Kenwood, 8044 Montgomery Rd., Suite 700  
.....Cincinnati, OH 45236  
.....Doing Business As: Planning Works, LLC

#019 .....2133 Luray Ave.  
.....Cincinnati, OH 45206  
.....Doing Business As: Pension Corporation of America

#023 .....1954 Evelyn Byrd Ave.  
.....Harrisonburg, VA 22801  
.....Doing Business As: Loomis Wealth Management, LLC

#024 .....9078 Union Centre Blvd., Suite 350  
.....West Chester, OH 45069  
.....Doing Business As: Kohn Wealth Management Advisors, LLC

#025 .....521 Barret Ave.  
.....Louisville, KY 40204  
.....Doing Business As: Green & Halliburton, Inc.

#IA033 .....323 W. 2<sup>nd</sup> St.  
.....Cedar Falls, IA 50613  
.....Doing Business As: Financial Designs, LLC

#KY030 .....4350 Brownsboro Rd. Suite 110  
.....Louisville, KY 40207  
.....Doing Business As: Aldyn Capital LLC

#MO032.....12412 Powerscourt Dr. Suite 150  
.....St. Louis, MO 63131  
.....Doing Business As: Millennium Financial

#OH031 .....17601 W. 130<sup>th</sup> Street  
.....North Royalton, OH 44133  
.....Doing Business As: M3 Wealth Management / Healy Financial Services



#OH031 ..... 17601 W. 130<sup>th</sup> Street  
..... North Royalton, OH 44133  
..... Doing Business As: M3 Wealth Management / King Financial Inc.

#OH031 ..... 17601 W. 130<sup>th</sup> Street  
..... North Royalton, OH 44133  
..... Doing Business As: M3 Wealth Management / Pinzone Financial Services

## **Advisory Business (Item 4)**

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### **Firm Description**

L. M. Kohn & Company (LMK) was founded in 1990 by Larry M. Kohn. The firm is registered with the SEC (Securities and Exchange Commission) as a Broker/Dealer with 91 registered reps and as a Registered Investment

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Adviser with 68 Investment Adviser Representatives. Some of our investment adviser representatives do business under separate names other than L.M. Kohn & Company, for purposes of marketing themselves and their services. They are not separately registered as investment advisers or broker-dealers. All agreements are with, and fees are paid to, L.M. Kohn & Company.

LMK provides personal financial planning and investment management to individuals, families and their related entities, trusts and estates, not for profit organizations, and family businesses. LMK works with clients to define financial objectives and to develop strategies for reaching those objectives, some of which may include: identification of financial problems, cash flow and budget management, tax planning, risk exposure review, investment management, Education funding, retirement planning, estate planning, charitable goals, special needs planning, family business succession issues, fringe benefits, and/or other issues specific to the client. LMK also offers services to small businesses relating to the design, structure, implementation and administration of employee benefit plans.

As a securities broker-dealer, the firm sells products or services in addition to investment advisory services. These products and services include but are not limited to equity securities (exchange-listed securities, securities traded over-the-counter, foreign issues, etc.), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, mutual fund shares, etc.), United States governmental securities, UIT's and options contracts on securities. Investment advice is also provided in investments such as CMOs, Mortgage-backed securities, U.S. Government Territory (for example Guam and the Virgin Islands) investments, as well as interest rate and index options. No referral fees are paid or received for advisory accounts. No benefits are received from custodians/broker-dealers based on client securities transactions ("soft dollar benefits").

Assets under the direct management of LMK are held by independent custodians, including RBC Correspondent Services, a division of RBC Capital Markets, LLC, TD Ameritrade or others, in the client's name. LMK does not act as a custodian of client assets, although we may at times be considered by the SEC to technically have "custody" over certain types of accounts held at independent custodians.

We may recommend other professionals (e.g., lawyers, accountants, insurance agents, real estate agents, etc.) at the request of the client. Other professionals are engaged directly by the client on an as-needed basis even when recommended by the advisor. Conflicts of interest will be disclosed to the client and managed in the best interest of the client.

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### **Principal Owners**

Larry M. Kohn is a Director and Chief Executive Officer.

Carl R. Hollister is a Director, President, Chief Compliance Officer, and Chief Operating Officer.

Terrence Donnellon is a Director and Secretary. He is also separately employed as an attorney by Donnellon, Donnellon and Miller (DD&M), a law firm. Clients of LMK may be referred to DD&M and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

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### **Types of Advisory Services**

The primary type of advisory service offered by LMK is investment management and financial planning. In performing its services, LMK is not required to verify any information received from the client or from the client's other professionals. Each client is advised that it remains his/her responsibility

to promptly notify LMK when there is any change in his/her financial situation and/or financial objectives for the purpose of reviewing, evaluating, or revising previous recommendations and/or services.

The following are typical investment planning arrangements offered to clients:

### **Investment Management Services**

This service includes financial planning, implementation, and ongoing asset management/monitoring services. This service may include identification of financial problems, cash flow and budget management, tax planning, risk exposure review, investment management, Education funding, retirement planning, estate planning, charitable goals, small business planning issues, fringe benefits, special needs planning or other issues specific to the client. The engagement also includes implementation of recommendations accepted by client, unlimited telephone support, meetings as required, on-going financial planning services, reminders of the specific courses of action that need to be taken, and quarterly, semi-annual or annual written portfolio reviews as negotiated with each client. More frequent reviews may occur but are not necessarily communicated to the client unless significant changes are recommended.

### **FEE BASED PROGRAMS OFFERED THROUGH RBC CORRESPONDENT SERVICES:**

In a discretionary account, the customer gives the Portfolio Manager the authorization to make purchases and sales in the account without first obtaining the customer's permission. In a non-discretionary account, the portfolio manager must obtain the customer's permission to make purchases and sales. LMK advisory accounts may be non-discretionary or discretionary, as described in each advisory agreement.

### **ADVISOR:**

Customized, professional investment advice developing an asset allocation strategy suited to the client's needs. The Advisor Program allows the IAR to provide the client with customized, professional investment advice. The IAR develops an asset allocation strategy suited to the client's needs. This non-discretionary platform offers access to a wide variety of securities, no sales charges or transaction fees, complimentary Investment Account Access (Visa Gold Debit Card/Rewards Program) as well as free check writing.

### **UNBUNDLED MANAGED ACCOUNT SOLUTIONS (uMAS):**

An unbundled, managed account platform that offers an A La Carte offering list with quarterly performance reporting and flexible billing options as well as comprehensive portfolio management tools. These tools are chosen after the client and Financial Consultant review and execute the LMK RIA Agreement. Reports may include market commentary, summary reports, risk comparison statistics utilizing Riskalyze, asset allocation market values, cash flows, and portfolio evaluation. Outside Money Manager Portfolios may also be included in the reporting. The uMAS program also allows the IAR to provide the client with customized, professional investment advice. The IAR develops an asset allocation strategy suited to the client's needs. uMAS accounts may be non-discretionary or discretionary, as described in each advisory agreement.

### **RBC UNIFIED PORTFOLIO (RBC UP)**

RBC UP is an advisory program that combines the functionalities of many advisory platforms into one account. RBC UP may be offered on a discretionary or non-discretionary basis. This program allows advisors to choose

from several different products including third-party managers, mutual funds, ETF's, and more while combining them into one account with one statement and one 1099. These different types of investment selections are billed at the sleeve level which may enable lower overall management fees than if separated into different accounts. This program is powered by Envestnet's technology, which RBC has leverage for the use of this program, containing a robust proposal tool, performance reporting, and more. An Advisory Master Service Agreement (AMSA) contract is required to be on file, this contract allows the advisor to streamline account maintenance and changes to existing accounts. The AMSA contract allows the advisor to accept verbal instructions to open, change or maintain an RBC UP account.

## **RESOURCE II**

This program provides participants discretionary investment management services. The portfolio management services feature a select group of independent investment advisors which RBC Correspondent Services has previously reviewed as sub advisors in the program through a due diligence screening process. LMK will review the client's advisory needs, as well as other objectives and risk tolerances, and assist the client in selecting an appropriate advisor(s) from the group.

On occasion, either RBC Correspondent Services or LMK may suggest to a client that he or she replace an existing independent investment advisor with another. However, any change in independent advisor must be approved by the client. LMK and RBC Correspondent Services do not have discretion to change an independent advisor.

### **"Wrap" Program**

LMK offers a program whereby our investment adviser representative will manage clients' assets within a brokerage account for a single fee that includes portfolio management services, reporting and transaction costs. Under this program, we offer investment advice designed to assist clients with professional management of their investments for a convenient single "wrap fee." In a discretionary account, the customer gives the Portfolio Manager the authorization to make purchases and sales in the account without first obtaining the customer's permission. "Wrap" accounts may be non-discretionary or discretionary, as described in each advisory agreement. More information about the program is available in our Wrap Fee Brochure.

### **Model Portfolios**

For qualified clients, a small number of IAR's may recommend a predetermined model portfolio. When recommending a model portfolio, the Advisor takes into consideration suitability issues such as risk tolerance, investment objective, etc., however, it is disclosed to the client that the actual investment transactions in the portfolio are strictly governed by the model and not chosen by the advisor. These transactions do not take into consideration client tax sensitivity, time horizon, or other suitability considerations. The IAR has no control over the realized capital gains or losses (short term or long term) produced by the portfolio which may affect the customer's tax liabilities.

Depending on the model type, the IAR receives the information regarding portfolio changes either from email alerts, newsletters, or quarterly updates, therefore, the trades performed by the IAR will not be priced the same as the trades performed by the model. Past performance of the model does not guarantee future results. The investment return and principal value of the investment when sold or redeemed may be worth more or less than the original cost.

Descriptions of the portfolio models offered by Investment Advisory Representative are located in the brochure supplement of that Advisor.

### **Financial Planning**

This service includes financial planning only. No implementation services or ongoing asset management services are provided. Financial planning may include identification of financial problems, cash flow and budget

management, tax planning, risk exposure review, investment management, Education funding, retirement planning, estate planning, charitable goals, small business planning issues, fringe benefits, special needs planning or other issues specific to the client. A written evaluation of the client's current situation and their goals is provided to the client.

At LMK, advisory services are tailored to the individual needs of clients. Client goals and objectives are clarified in meetings and via correspondence and are used to determine the course of action for each individual client. The goals and objectives for each client are documented in our client relationship management system and in client files, either in hard copy or in electronic files.

Clients may impose restrictions on investing in certain securities or types of securities. This must be done in writing and be signed by the client, LMK and the separate account manager if applicable. Agreements may not be assigned without client consent.

In general, the financial plan will address any or all of the following areas of concern:

**PERSONAL:** Family records, budgeting, personal liability, estate information and financial goals.

**TAX & CASH FLOW:** Income tax and spending analysis and planning for the past, current and future years. LMK will illustrate the impact of various investments on a client's current income tax and future tax liability.

**DEATH AND DISABILITY:** Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.

**RETIREMENT:** Analysis of current strategies and investment plans to help the client achieve his or her retirement goals.

**INVESTMENTS:** Analysis of investment alternatives and their effect on a client's portfolio.

LMK gathers required information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals and attitudes toward risk. Related documents supplied by the client are carefully reviewed, including a questionnaire completed by the client, and a written report is prepared. Should a client choose to implement the recommendations contained in the plan, LMK suggests the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of the financial plan recommendations is entirely at the client's discretion.

Flat or hourly fees may be charged for LMK's Financial Planning services. Each Financial Plan will be unique and different for each client. Clients may choose to execute brokerage or insurance recommendations through the associated persons of LMK in their separate capacity as registered representatives of LMK, and independent insurance agents of various agencies.

Under these circumstances, these individuals will receive separate, yet customary commission compensation in this capacity. If LMK clients do not choose to implement recommendations through LMK, the firm may or may not be compensated for its Financial Planning service.

In addition, it is LMK's hope that these Financial Planning clients will opt to contract with LMK for money management services. However, Financial Planning clients are free to use any adviser they choose.

### **Money Manager Search and Monitoring**

LMK IAR's do currently recommend outside investment advisers to some clients. Based on a client's individual circumstances and needs, LMK will determine which independent adviser's portfolio management is appropriate

for that client. Factors considered in making this determination include account size, risk tolerance, the opinion of each client, tax issues relevant to the client, and the investment philosophy of the independent advisor. Clients should refer to the independent adviser's document for a full description of the services offered. LMK will meet with the client on a regular basis, or as determined by the client, to review the account. LMK currently has such arrangements with: Asset Management, Bowling Portfolio, CLS Investment, Crawford Investment Counsel, CornerCap Investment Counsel, Fort Washington Investment Advisors, Mench Financial, Minneapolis Portfolio Mgmt., Optimal Capital Advisors LLC, Saratoga Capital Mgmt., SEI Investments, Snow Capital Management LLC., and State Street Global (which is exempt from the minimum fee rule). Such third-party manager arrangements are contracted separately, and their advisory fees charged to clients separately from LMK advisory fees. None of the above-mentioned advisers are affiliated with LMK by ownership or by any control relationship.

If LMK believes that a particular independent adviser is performing inadequately, or if LMK believes that a different manager is more suitable for a client's particular needs, then LMK may suggest that the client contract with a different adviser.

### **Fiduciary and Consulting Services**

This service is to aid plan sponsors in achieving compliant and successful retirement plan services. These objectives may include:

- Design and adopt an Investment Policy Statement (IPS)
- Implement a mutual fund platform
- Create and execute an indemnification program for fiduciaries
- Maintain and update a Fiduciary File
- Review plan documents for compliance and latest updates

### **Special Projects**

Projects may be undertaken that are not described in other types of agreements, including implementation of Financial Planning recommendations, periodic investment portfolio review, assistance with tax planning, employee benefit plan administration or other services specifically requested by the client.

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### **Tailored Relationships**

At LMK, advisory services are tailored to the individual needs of clients. Client goals and objectives are clarified in meetings and via correspondence and are used to determine the course of action for each individual client. The goals and objectives for each client are documented on the New Account form or the Customer Acknowledgment form and in client files, either in hard copy or in electronic files. Agreements may not be assigned without client consent.

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### **Managed Assets**

LMK manages assets on either a discretionary or nondiscretionary basis. We have approximately \$64,646,968 in client assets managed on a discretionary basis and \$1,031,819,369 in client assets managed on a non-discretionary basis. Together, these assets represent approximately 2314 client households.

## **Fees and Compensation (Item 5)**

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## Description

The specific manner in which fees are charged by LMK is established in a client's written Advisory Services Agreement with LMK.

### **PRIMARY FEE SCHEDULE FOR LMK ADVISORY SERVICES**

Asset Based Fee that can be charged by the Registered Representative as the advisor's fee - Range: 0.25% - 2.5%, annually based on assets/services rendered. Advisory fees are charged on a quarterly basis and will be invoiced to the client or debited from a client directed account. Any fee that a Third Party Administrator charges in addition to the Registered Representative's fee will be indicated on the LM Kohn agreement.

### **FEE SCHEDULE FOR RESOURCE II (NON-MODEL BASED\*) ACCOUNT PLATFORM OFFERED THROUGH RBC CORRESPONDENT SERVICES**

Asset Based Fee - charged on a quarterly basis at the beginning of each quarter. The following fee schedule does not include the Third Party Manager's fees which range from 0.17% - 0.50%. The Third Party Manager's fee will be reflected on the LM Kohn advisory agreement.

\$100,000 - \$249,999	0.40% to 2.5%
\$250,000 - \$499,999	0.35% to 2.5%
\$500,000 - \$999,999	0.31% to 2.5%
\$1,000,000 - \$1,999,999	0.30% to 2.0%
\$2,000,000 - \$2,999,999	0.28% to 2.0%
\$3,000,000 - \$4,999,999	0.26% to 2.0%
\$5,000,000+	Negotiable

\*Resource II accounts that were formerly model-based now fall under the RBC UP Program

### **FEE SCHEDULE FOR RBC UNIFIED PORTFOLIO (RBC UP) PROGRAM OFFERED THROUGH RBC CORRESPONDENT SERVICES**

Asset Based Fee – charged on a quarterly basis at the beginning of each quarter. The following fee schedule reflects a maximum of three levels of fees: advisor fee, program fee, and manager fee. An all-in client fee is reflected on the Statement of Investment Selection (SIS) as the “Client Fee”, which will also match the fee stated on the LM Kohn advisory agreement. If a third party manager is selected, manager fees can range from 0.00% - 0.65%. Fees are billed at the account level.

\$25,000 - \$99,999	0.50% to 3.0%
\$100,000 - \$249,999	0.45% to 3.0%
\$250,000 - \$499,999	0.40% to 3.0%
\$500,000 - \$999,999	0.36% to 3.0%
\$1,000,000 - \$1,999,999	0.35% to 2.5%
\$2,000,000 - \$2,999,999	0.33% to 2.5%
\$3,000,000+	0.31% to 2.5%

\*Overlay services may provided for 5 basis points, with an additional 5 basis points for tax management / impact investing.

## **FEE SCHEDULE FOR ADVISOR PLATFORM OFFERED THROUGH RBC CORRESPONDENT SERVICES**

Asset Based Fee - charged on a quarterly basis at the beginning of each quarter.

\$25,000 - \$250,000	0.55% to 2.75%
\$250,001 - \$1,000,000	0.55% to 2.75%
\$1,000,001 - \$3,000,000	0.45% to 2.00%
\$3,000,001 - \$5,000,000	0.30% to 2.00%
\$5,000,001 - \$10,000,000	0.20% to 2.00%
Above \$10,000,001	Negotiable

**\*Clients electing to utilize the Tax Management Services option, will be assessed an additional 10 basis point fee.**

## **FEE SCHEDULE FOR UNBUNDLED MANAGED ACCOUNT SOLUTIONS (uMAS) OFFERED THROUGH RBC CORRESPONDENT SERVICES**

Asset Based Fee - Range: 0.25% - 2.5% annually based on assets/services rendered. Advisory fees are charged on a quarterly basis and will be invoiced to the client or debited from a client directed account. In most cases clients will be invoiced in advance per calendar quarter based upon the month end values (market value and fair market value in the absence of market value, plus any credit balance or minus any debit balance on a time weighted basis for all % asset based fees), of the client's account during the previous quarter. Fee adjustment transactions will be placed in the account the following quarter.

Non-WRAP program accounts under the UMAS or brokerage platform will have agency commissions charged to cover execution and order processing costs not to exceed \$35.00 per transaction. This will include UIT, fixed income, options and equity transactions.

Envestnet offers Advisors and Clients with a range of investment advisory tools for use by Advisors with their Clients through its Private Wealth Management Programs. Envestnet also offers to Advisors and Clients a platform for SMA (Separately Managed Account) or UMA (Unified Managed Account) with Third Party Managers, whereby Envestnet provides only administrative and technology services. Envestnet fees paid by the client are listed on the client's *Statement of Investment Selection* as the Sponsor Fee. Advisor determines for each client which services and Programs of Envestnet to utilize and this may include the utilization of services of other third-party service providers in conjunction with the Programs. Envestnet, L.M. Kohn or other affiliated parties may receive 12b-1 fees from mutual funds in which Clients invest. Asset Based Fee - annually based on assets/services rendered. Advisory fees are charged on a quarterly basis in advance and will be debited from the client account. Envestnet fees paid by the client are listed on the client's *Statement of Investment Selection* as the Sponsor Fee. The full fee schedule including the breakpoint tiering structure will be shown in the SIS. Accounts will be prorated for all deposits and withdrawals (principle not income) in the amount of \$10,000.00.

## **FEE SCHEDULES FOR ACCOUNTS HELD AT TD AMERITRADE**

Asset Based Fee - Range: 0.25% - 2.5% annually based on assets/services rendered. Advisory fees are charged on a quarterly basis in arrears during the first month of each calendar quarter (January, April, July, and October) and are based on a percentage of the Average Daily Balance for the portfolio. The first billing cycle begins on the account inception date and is prorated based on the number of days in the calendar quarter. Accumulated values



are calculated each day of the period. The accumulation is then divided by the total number of days the assets units balance was non-zero in the period. The average asset balances are summed to obtain an Average Daily Balance for the portfolio.

As documented on the advisory agreement, the advisor and client may choose the Wrap Fee Program (to charge a single fee that includes portfolio management services, reporting and transaction costs) or to have the transaction costs billed separately to the account. The transaction costs include but may not be limited to Equity Trades - \$7.95 per trade and Mutual Fund Trades - \$19.99 per trade.

## **ALTERNATIVES -**

**Flat Fee** - As an alternative, clients may also elect to receive advisory services for an annual flat fee which will be billed quarterly in arrears ranging from \$200 to \$6000 per year depending on the nature of the advisory services provided and the client's financial circumstances.

**Financial Plan** - The fee amount for a written financial plan may be based on an hourly rate not to exceed \$250.00 per hour, or based on a negotiated set fee amount stated in the Advisory Agreement. Whichever method is chosen, the total fee for a written financial plan may not exceed \$3,500.00 within a 12-month period.

**Investment Management and Consulting Services** – Fees for Investment Management and Consulting Services are negotiated on a case by case scenario and are based on the estimated time and work involved for the services that are being provided. The fee for these services may be an annual flat fee not to exceed \$50,000 within a 12-month period or an asset based fee range of 0.25% - 2.5% annually. Fees are be billed quarterly.

**WRAP FEES** – “Wrap Fee” arrangements wherein the broker or dealer may recommend retention of LMK or retention of another investment adviser, pay LMK's and/or another adviser's investment advisory fee on behalf of the client, monitor and evaluate LMK's and/or another adviser's performance, execute the client's portfolio transactions without commission charge, and provide custodial services for the client's assets, or provide any combination of these or other services, all for a single fee paid by the client to the broker dealer. In evaluating such an arrangement, a client should recognize that brokerage commissions for the execution of transactions in the client's account are not negotiated by LMK and/or another investment adviser. Transactions are executed “net” i.e., without commission, and a portion of the wrap fee is generally considered as being in lieu of commissions.

Trades are generally expected to be executed only with the broker dealer with whom the client has entered into the wrap fee arrangement, so that the advisory firm may not be free to seek best price and execution by placing transactions with other broker dealers. Our experience indicates that certain broker dealers under clients' wrap fee agreements generally can offer best price for transactions in listed equity securities. But no assurance can be given that such will continue to be the case with those or other broker dealers which offer wrap fee arrangements, nor with respect to transactions in other types of securities. Accordingly, the client may wish to satisfy himself that the broker dealer offering the “wrap fee” arrangement can provide adequate price and execution of most or all transactions. The client should also consider that depending upon the level of the wrap fee charged by the broker dealer, the amount of the portfolio activity in the client's account, the value of custodial and other services which are provided under the arrangement and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately; particularly if LMK and/or another investment adviser were free to negotiate commissions and seek best price and execution of transactions for the client's account. Fees are paid quarterly, in advance. The wrap fee paid to LMK is listed below. LMK will quote an exact percentage to each client based on both the nature (whether equity, balanced, or fixed income) and total dollar value of that account. Clients will be invoiced quarterly depending on their specific agreement. All “wrapped” fees are negotiable between LMK and the participating client.

Resource II and RBC UP Wrap-fee program participants should reference RBC Correspondent Services Schedule H wrap-fee disclosure document for further information regarding fees for each separate program. (LIST RBC UP)

L.M. Kohn & Company Wrap-fee program participants must be provided with a copy of the L.M. Kohn & Company Wrap Fee Brochure.

**MONEY MANAGER SEARCH AND MONITORING** - Contractually, LMK may be paid by the independent adviser for whom it solicits, based on a percentage of the client's managed assets (ranging from 0.3% to 1.0%), which is in addition to the independent investment adviser's annual management fee, depending on the size of the account. LMK may also, at its discretion, charge management fees ranging from 1% to 3%, from which LMK is responsible for payment to the underlying manager. In other cases, Third Party Manager Arrangements are contracted separately, and their advisory fees charged to clients separately from LMK advisory fees. The management fee is disclosed in the independent investment adviser's disclosure document (Part II of Form ADV or other disclosure document in lieu of part II).

**COMMISSIONS AND FEES** - Some RBC Platforms or the standard LMK Advisory Services Agreement allow for the charging of commissions in addition to advisory fees for non WRAP accounts. In those cases depending on the chosen investment platform, we will allow IAR's to charge nominal commissions to cover execution in addition to investment advisory fees. These commissions will not exceed \$25.00 per transaction. There will be no principal transactions in any L.M. Kohn & Company advisory account unless that specific asset has been excluded from the fee calculation. Additionally there will be no agency cross transactions with any advisory account. All fixed income transactions will be executed on an agency basis and will be bought or sold at the best prevailing price based on liquidity and quantity. For sales of fixed income securities TRAQs (FINRA MARKET DATA) and EMMA (MSRB trade reporting) will be utilized for price and quantity comparisons as well as the use of bona fide Brokers Broker in obtaining bids on securities for sale. In such circumstances, the agreement has clear disclosures that commissions will be charged in addition to fees. The client must initial next to these disclosures to verify that they are aware that commissions will be charged. LMK urges clients to have a clear understanding of the estimated number of transactions that the advisor intends to recommend for the client on an annual basis and how the commissions will impact the expenses of these transactions before initialing and signing this agreement.

**FEES FOR ERISA COVERED PLANS** Pursuant to the Employee Retirement Income and Securities Act (ERISA), and regulations under the Internal Revenue Code of 1986 (the "Code"), our firm is subject to specific duties and obligations. ERISA section 408(b)(2) requires covered service providers to ERISA plans to disclose information regarding their services and compensation received for such services to responsible plan fiduciaries. This final regulation establishes specific disclosure obligations for covered service providers to ensure that responsible plan fiduciaries are provided with the required information they need to make more informed decisions when selecting and monitoring service providers for their plans. The 408(b)(2) regulation amends a prohibited transaction rule under ERISA and the Internal Revenue Code (the "Code"), that states that it is a prohibited transaction for a "covered plan" to enter into an arrangement with a covered service provider unless the arrangement is reasonable, and the compensation being received by the service provider is reasonable.

**GENERAL INFORMATION ON FEES** - In certain circumstances, all fees and/or account minimums may be negotiable. However, clients participating in any of the RBC Correspondent Services wrap-fee programs should refer to the Schedule H of the particular program for further information.

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 funds of an advisory client (SEC Rule 205(a)(1)).

A client agreement may be cancelled at any time, by either party, for any reason upon receipt of 30 days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

All fees paid to LMK for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds, UIT's and ETF's to their shareholders. These fees and expenses are described on each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible

distribution fee.

Accordingly, the client should review both the fees charged by the funds and the fees charged by LMK to fully understand the total amount of fees to be paid by the client and to evaluate the advisory services being provided.

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### **Fee Billing**

LMK will generally bill its fees on a quarterly basis in advance. Clients may elect to be billed directly for fees or to authorize LMK to directly debit fees from client accounts. Since advisory fees deducted from a tax-sheltered retirement account are not tax deductible, clients should consult their accountant to determine whether paying fees from non-qualified funds will result in beneficial tax deductions. It is LMK's policy that performance reporting be calculated net of fees, however, when fees are paid from outside funds, this is not possible. In other words, when fees are not debited directly from the account, the reported performance will be higher than when fees are debited directly from the account.

Management fees shall be calculated based on the market value at the end of the period, adjusted for in quarter deposits. Accounts initiated or terminated during a quarterly billing period will be charged a prorated fee. Clients are entitled to immediately terminate their Advisory Services Agreement with LMK upon written notice to LMK of such termination. Upon termination of any account, unpaid fees will be due and payable. LMK does not require payment of fees in advance. Special Projects services are billed for services rendered.

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### **Other Fees**

LMK's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to LMK's fee, and LMK shall not receive any portion of these commissions, fees, and costs.

Please see the section entitled "Brokerage Practices" on pages 24 and 25 for more information.

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### **Past due Accounts and Termination of Agreement**

LMK reserves the right to stop work on any account that is more than 60 days overdue. In addition, LMK 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 to providing proper financial advice, per the judgment of LMK. Clients may terminate their agreement at any time by providing written notice. Terminating clients will receive an itemized bill for work completed.

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### **Compensation for Sales of Investment Products**

Unless specifically disclosed on the Advisory Agreement, LMK does not normally sell securities that pay a commission. Mutual funds, index funds and exchange-traded funds of all types charge their shareholders various advisory fees and expenses associated with the establishment and operation of the funds. Each fund's prospectus describes these fees and expenses, which generally include a management fee, shareholder servicing, portfolio transaction costs, other fund expenses, and sometimes a distribution fee. These separate mutual fund fees are disclosed in each fund's current prospectus, which is available from the mutual fund and, upon request, from us.

Consequently, for any type of mutual fund investment, it is important to understand that investors are directly, and indirectly, paying two levels of advisory fees and expenses: one layer of fees at the fund level and one layer of advisory fees and expenses to LMK or RBC. Generally speaking, most mutual funds may be purchased directly, without using our services and incurring our advisory fees. Many mutual funds also pay shareholder servicing fees (12b-1 fees) to brokerage firms, and their registered representatives, in consideration of their services to the

fund's shareholders. Clients have the option of purchasing investment products that are recommended by LMK through other brokers or agents not affiliated with LMK. It is the policy of LM Kohn for IAR's to utilize the lowest cost share class available on the RBC or TDA platforms for mutual funds recommended and/or purchased for LM Kohn advisory accounts. However, for qualified and non-qualified plan accounts, RBC will rebate the 12b-1 to your account. TDA, as qualified custodian retains any, if at all generated, 12b-1 fees within those accounts and does not share any part of them with the firm or our IAR's.

The payment of 12b-1 fees may represent a conflict of interest by providing an incentive to the LMK representative or firm to purchase mutual funds that pay these fees. LMK representatives will discuss with the client the rationale for purchasing a mutual fund with 12b-1 fees prior to the purchase and the final decision remains with the client.

## **Performance-Based Fees (Item 6)**

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### **Sharing of Capital Gains**

LMK does not use a performance-based fee structure. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client. However, the nature of asset-based fees allows LMK to participate in the growth of the client's wealth. This also means that our fees can decline when the client's portfolio declines in value.

## **Types of Clients (Item 7)**

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### **Description**

LMK generally provides investment advice to individuals, high net worth individuals, families, trusts, qualified retirement plans, not for profit organizations, estates and businesses. Advice may extend to entities related to the client such as small businesses and charitable organizations, including foundations and endowments. Client relationships vary in scope and length of service.

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

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### **Methods of Analysis**

Security analysis methods at LMK use a combination of methods including fundamental analysis, the valuation method and technical analysis. The main sources of information include Morningstar reports, fund prospectuses, S&P reports, Thompson Reuters Stock Reports, financial newspapers and magazines, research materials prepared by others, filings with the Securities and Exchange Commission, and annual reports. Employees of LMK may also attend on- and off-site visits with fund and portfolio managers, conference calls, and industry conferences. We believe these resources for information are reliable and we regularly depend on them for making our investment decisions; however, we are not responsible for the accuracy or completeness of this information.

Fundamental analysis is a technique that attempts to determine a security's value by focusing on the economic well-being of a financial entity as opposed to only its price movements. When conducting fundamental analysis, we will review a company's financial statements and consider factors including, but not limited to, whether the company's revenue is growing, if the company is profitable, if the company is in a strong enough position to beat its competitors in the future, and if the company is able to repay its debts. Because it can take a long time for a company's value to be reflected in the market, the risk associated with this method of analysis is that a gain is not realized until the stock's market price rises to the company's true value.

The valuation method is a technique used to calculate a theoretical value for a security in order to estimate potential future market prices. When utilizing the valuation method, we will review such things as a security's earnings per share, price to earnings, and growth rate.

We also utilize technical analysis to evaluate potential investments. Unlike fundamental analysis, technical analysis does not analyze the company's value, instead analyzes the stock's price movement in the market. Charting is a form of technical analysis in which the various technical factors are diagrammed in order to illustrate patterns. Technical analysis studies the supply and demand in the market in an attempt to determine what direction, or trend, will continue in the future. However, there are risks involved with this method, including the risk that the trends will change unpredictably, which is why we use a combination of methods and sources.

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## **Investment Strategies**

We may use passively-managed index and exchange-traded funds when appropriate for the client and actively-managed funds, stocks, options, certificate of deposits and individual government, corporate, or municipal bonds where there are opportunities to make a difference by security selection. We may recommend implementing one or more investment strategies including: long-term purchases (held at least a year), short term purchases (held less than a year), active trading (held less than 30 days), short sales (selling of a security that the seller does not own, based on the assumption that the seller will be able to buy the stock at a lower amount than the price at which the seller sold short), margin transactions (purchase of a security on credit extended by a securities company), and option writing (selling an option).

The investment strategy for a specific client is based upon the objectives, income needs, and tax situation stated by the client during consultations. The client may change these objectives at any time. Each client portfolio is constructed solely for that client.

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## **Risk of Loss**

All investment programs have certain risks that are borne by the investor. Our investment approach keeps the risk of loss in mind. However, as with all investments, clients face investment risks including the following: Loss of Principal Risk, Interest-rate Risk, Market Risk, Inflation Risk, Currency Risk, Reinvestment Risk, Business Risk, Liquidity Risk, and Financial Risk.

## **Disciplinary Information (Item 9)**

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### **Legal and Disciplinary**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of LMK or the integrity of LMK's management. There have been no legal or disciplinary events involving LMK or its management. Disciplinary events and disclosures for individual IAR's are described in the Brochure Supplement (Part 2b).

## **Other Financial Industry Activities and Affiliations (Item 10)**

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### **Affiliations**

LMK is registered as a securities broker-dealer and recommends to its advisory clients clearing through either RBC Correspondent Services (RBC), a division of RBC Capital Markets, LLC or TD Ameritrade, based on the electronic linkage available, the competitive commission structure and the services available. However, clients may elect to use the custodial and brokerage services of any licensed broker or trust company provided a satisfactory computer link can be established. LMK intends to continually review other custodial and transactional service providers to ensure that its clients receive competitive commission rates and high quality execution. These relationships do not constitute a conflict of interest. LMK may receive minimal benefit from ticket charges from trades placed from RBC but not TD Ameritrade. LMK does not have any relationships with futures or commodity entities. LMK IAR's do currently recommend outside investment advisors to some clients.

LMK has associations with other investment advisers, accounting firms, law firms, pension consultants and insurance companies and agencies.

### **RBC Capital Markets Disclosure:**

As required by the Securities and Exchange Commission (SEC), we are providing you with notice that we are updating our Disclosure Documents\* with the information described below.

#### **\*Item 9. Additional Information: Section titled “Disciplinary Information”:**

Without admitting or denying the findings, RBC CM consented to the sanctions and to the entry of findings that RBC CM failed to take reasonable steps to establish that certain of the intermarket sweep orders (ISOS) it routed met the definitional requirements set forth in Rule 600(B)(30) of Regulation NMS. The findings stated that on the review date, RBC CM failed to take reasonable steps to avoid displaying, and engaged in a pattern of practice of displaying, quotations that locked or crossed a protected quotation, without simultaneously routing an ISO to execute against the full displayed size of any protected quotation that was a locking quotation or crossing quotation. The findings also stated that RBC CM’s supervisory system did not provide for supervision reasonably designed to achieve compliance with respect to the applicable securities laws and regulations, and the rules of the exchange, concerning ISOS that complied with the SEC’s Regulation NMS. Specifically, RBC CM’s supervisory system did not include written supervisory procedures that would enable it in certain instances to promptly identify issues with RBC CM’s access to timely and accurate market data. RBC CM’s regulation NMS compliance ISO exception reports, which were reviewed by RBC CM personnel, did not identify that RBC CM had locked or crossed a protected quotation on the review date. In October 2017, RBC CM settled for a total of \$94,000 across eight exchanges (Bats BYX \$10,500; Bats BZX \$10,500; Bats EDGA \$10,500; Bats EDGX \$21,000; Nasdaq BX \$10,500; Nasdaq \$10,500; NYSE Arca \$10,500; NYSE \$10,500).

#### **\* Item 4.A. General Description of Programs: Section titled “Total Strategy Account”:**

On June 30, 2018, the name of the Total Strategy Account Program will be changed to RBC Unified Portfolio.

#### **\*Item 9. Additional Information: Section titled “Disciplinary Information”:**

Without admitting or denying the findings, RBC CM consented to the sanctions and to the entry of findings that it inappropriately used Options Clearing Corporation (OCC) adjustments to create a position without trading on an exchange and subsequently inappropriately used OCC adjustments to close out a position without trading on an exchange. The findings stated that further, it was determined that RBC CM, through 273 internal entries, triggered OCC adjustments in a total of 107 symbols for a total of 203,478 contracts, which created long and short positions at the OCC without trading on an exchange, and resulted in inflated open interest. The findings also stated that RBC CM failed to follow its written supervisory procedures related to the proper use of OCC adjustments. RBC CM further failed to establish and maintain a supervisory system that was reasonably designed to achieve compliance with the applicable securities laws and regulations, and Box Options Exchange LLC rules, concerning OCC adjustments, as RBC CM did not have any procedures in place to verify that OCC adjustments were not associated with internal entries. On April 13, 2018, RBC CM was censured and fined \$150,000. RBC CM will provide you with a new Disclosure Document without charge, upon request to your Financial Advisor. Our Disclosure Documents are also available on the SEC’s web site, [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with RBC CM who are registered, or are required to be registered, as investment adviser representatives of RBC CM.

#### **\*Item 4.A. General Description of Programs: Section titled “Resource II”:**

Brochure Supplement  
L.M. Kohn & Company

On September 30, 2018, the Resource II Program will no longer offer model portfolios created and maintained by Model Providers or RBC CM, and traded by RBC CM as Overlay Manager. Model portfolios previously offered in Resource II are offered in the RBC Unified Portfolio Program.

*To All Clients with Advisor, RBC Unified Portfolio and Resource II accounts:*

**\*Item 9. Additional Information: Section titled “Disciplinary Information”:**

It was alleged that RBC CM violated CBOE Futures Exchange, LLC (CFE) Rules 401A, 412B(A) and 609. On numerous dates from May 2016 through May 2017, due to a third party service provider programming error and a failure to follow its own written procedures, RBC CM reported inaccurate open interest in various VX weekly contracts, resulting in overstatements of overall exchange open interest. In addition, on numerous dates between December 2016 and August 2017, due to a third party provider inputting incorrect reportable levels and a failure to follow its own written procedures, RBC CM failed to report large trader positions in various VX weekly contracts. On June 13, 2018, without admitting or denying the findings, RBC CM consented to the described sanctions and to the entry of the findings which resulted in a fine of \$50,000.

The Clearing House Risk Committee of the Chicago Mercantile Exchange (CME) alleged that RBC CM violated CME Rule 971.A.1. On June 29, 2018, without admitting or denying the findings, RBC CM consented to the described sanctions and to the entry of findings, and was fined \$50,000.

RBC CM will provide you with a new Disclosure Document without charge, upon request to your Financial Advisor. Our Disclosure Documents are also available on the SEC’s web site, [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with RBC CM who are registered, or are required to be registered, as investment adviser representatives of RBC CM.

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**Activities**

In addition to LMK, some IAR’s are associated with other activities. These activities are described in the Brochure Supplement (Part 2b) and are separate and distinct from the advisory services we provide. Clients should be aware that the receipt of additional compensation by these IAR’s creates a conflict of interest that may impair the objectivity of these individuals when making advisory recommendations. LMK and our IAR’s endeavor at all time to put the interest of the client first as part of our fiduciary duty as a registered investment adviser: we take the following steps to address this conflict:

- We disclose to clients the existence of all material conflicts of interest, including the potential for our firm and our IAR’s to earn compensation from advisory clients in addition to our advisory fees.
- We disclose to clients that they are not obligated to purchase recommended investment products from our advisors or affiliated companies.
- We collect, maintain and document accurate, complete and relevant client background information, including the client’s financial goals, objectives and risk tolerance.
- Our firm’s management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client’s needs and circumstances.
- We require that our advisors seek prior approval of any outside employment activity so that we may ensure that any conflicts of interest in such activities are properly addressed.
- We monitor these outside business activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
- We educate our advisors regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advices provided to clients.

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

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### **Code of Ethics**

LMK has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedure, among other things. All supervised persons at LMK must acknowledge the terms of the Code of Ethics annually, or as amended. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

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### **Participation or Interest in Client Transactions**

LMK and its employees may at times buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades, however, block trades may contain client and employee trades in the same block. Employees comply with the provisions of the LMK Code of Ethics. These procedures are designed to ensure that the personal securities transactions, activities and interests of the employees of LMK will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

The Chief Compliance Officer of LMK is Carl R. Hollister. He is assisted in this role by Andrew Kohn. All employee trades are reviewed by either Carl R. Hollister, Andrew Kohn, Kristin Hobbs or Bradley Dirheimer. Carl Hollister's personal trades are reviewed by Andrew Kohn, Kristin Hobbs or Bradley Dirheimer. Andrew Kohn, Kristin Hobbs or Bradley Dirheimer may have client accounts. The personal trading reviews ensure that the personal trading of employees is not based on inside information and that clients of the firm receive preferential treatment. The trades are not of a significant enough value to affect the securities markets.

## **Brokerage Practices (Item 12)**

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### **Selecting Brokerage Firms**

LMK recommends to some of its advisory clients the brokerage services of L.M. Kohn & Company, clearing through RBC Correspondent Services (RBC), a division of RBC Capital Markets, LLC, member NYSE/FINRA/SIPC. All LMK Investment Advisory Representatives (IAR's) are Registered Representatives of L.M. Kohn & Company. LMK currently recommends RBC based on the electronic linkage available, the competitive commission structure, and the services available. However, clients may elect to use the custodial and brokerage services of any licensed broker or trust company provided a satisfactory computer link can be established. LMK intends to continually review other custodial and transactional service providers to ensure that its clients receive competitive commission rates and high quality execution. This relationship does not constitute a conflict of interest.

Securities traded through RBC for investment advisory clients are not charged fees per tra

de unless the advisory contract between the IAR and the client clearly states that commissions will be charged. Sometimes trades are bunched so that multiple clients are making a purchase or sale of the same security. These shares are purchased/sold at the average cost per trade executed that day. In the event the total number of shares in the original order is not executed that day, the actual number of shares purchased/sold is pro-rated on an equitable basis, reserving the right to use round lots for practical purposes.

For clients that are invested in mutual funds, in addition to the fees that LMK charges for investment advisory services, there are additional advisory charges levied by the mutual fund group. No load mutual funds or mutual



fund A shares are purchased for clients without fees, however LMK representatives may be credited with 12b-1 fees.

As of August 2012, LMK also participates in the institutional customer program offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA. TD Ameritrade offers services to independent investment advisers which include custody of securities, trade execution, clearance and settlement of transactions. LMK receives some benefits from TD Ameritrade through our participation in the program. We may recommend TD Ameritrade to our clients for custody and clearing services. There is no direct link between our firm's participation in the program and the investment advice we give to our clients, although we receive economic benefits through our 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): duplicate client confirmations; research related products and tools; consulting services; access to a trading desk serving adviser 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 advisory 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 transactions fees and to certain Institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to LMK by third party vendors.

Products or services offered through TD Ameritrade may assist us in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits received by LMK or our advisors through the participation in the program do not depend on the amount of brokerage transaction directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by LMK or our advisors in and of itself creates a potential conflict of interest and may indirectly influence our recommendations of TD Ameritrade for custody and clearing services.

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### **Research and Other Soft Dollar Benefits**

LMK does not receive soft dollar benefits from the custodians to whom we recommend clients.

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### **Directed Brokerage**

For convenience and cost, LMK recommends to its advisory clients the brokerage services of L.M. Kohn & Company, clearing through RBC Correspondent Services (RBC), a division of RBC Capital Markets, LLC, member NYSE/FINRA/SIPC. LMK clients clearing through TD Ameritrade will use TD Ameritrade's brokerage services. Although RBC and L.M. Kohn & Company are the recommended service providers, clients are not required to use either firm. Other alternatives may result in a lower cost to the client.

When more than one account is trading a particular stock or ETF on the same day, block trading may be used to get identical pricing on the trades. If a client elects to use their own broker dealer for trades, it may result in a higher cost because the trades will not be aggregated to achieve best price.

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## **Review of Accounts (Item 13)**

### **Periodic Reviews**

LMK IAR's conducts regular, periodic (but not less than annually) formal reviews of its client's portfolios. LMK conducts trade reviews through systems including ProSurv and Financial Tracking. Additional reviews may be triggered by prevailing market conditions and changes in client circumstances. Reviews may also be triggered by market conditions. All reviews are conducted by IAR's, using client risk profiles, suitability and diversification as a guide. Trade reviews are done daily by authorized supervisors.

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### **Review Triggers**

Account reviews for clients are performed more frequently when market conditions dictate, or when a client's objectives change. A review may be triggered by client request, changes in market condition, new information about an investment, changes in tax laws, or other important changes.

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### **Regular Reports**

Clients can receive monthly or quarterly brokerage account statements from their custodian. RBC clients can opt to receive Portfolio View Reports. TD Ameritrade clients can opt to receive DB CAMS reports. In addition, IAR clients can opt to receive PortfolioView Morningstar report. They have the option of receiving these reports in a printed or on-line format. We encourage clients to compare the two reports for accuracy.

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## **Client Referrals and Other Compensation (Item 14)**

### **Incoming Referrals**

LMK has been fortunate to receive many client referrals over the years. The referrals have come from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other sources. The firm does not pay for referrals.

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### **Referrals to Other Professionals**

LMK does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

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## **Custody (Item 15)**

### **Account Statements**

All assets are held at banks, broker dealers or other qualified custodians, who provide account statements directly to clients at their address of record at least quarterly. LMK urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our vendor performance reporting statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

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### **SEC "Custody"**

According to a recent ruling by the SEC, investment advisers are deemed to have "custody" of client funds if certain conditions are met. From time to time, LMK may be technically considered to have "custody" of certain types of accounts, such as when a staff member acts as a trustee of an unrelated trust and LMK acts as the investment adviser to that trust. In this case, the SEC requires an annual surprise audit of those "custodied" accounts by an independent CPA firm.

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## **Investment Discretion (Item 16)**

### **Discretionary Authority for Trading**

In a discretionary account, the customer gives the Portfolio Manager the authorization to make purchases and sales in the account without first obtaining the customer's permission. In a non-discretionary account, the portfolio manager must obtain the customer's permission to make purchases and sales.

LMK receives discretionary authority in writing from clients at the outset of an advisory relationship in the investment management agreement. Choosing discretionary authority grants us the ability to determine, without obtaining the client's specific consent, the securities to be bought or sold for the portfolio, the amount of securities to be bought or sold, and in most cases, the broker-dealer to be used and the commission rate to be paid (not to exceed amount indicated on advisory agreement). In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the account, by considering the size of the account, and the risk tolerance.

Also, clients may sign an agreement with the custodian which generally includes a limited power of attorney granting LMK authority to direct and implement the investment and reinvestment of the assets within the account, but not to direct the assets outside of the account.

When selecting securities and determining amounts, LMK observes any investment policies, limitations and restrictions provided to us in writing. For registered investment companies, our authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

## **Voting Client Securities (Item 17)**

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### **Proxy Votes**

As a matter of firm policy and practice, LMK does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. LMK may provide advice to clients regarding the clients voting of proxies. If you want advice in voting proxies please contact Carl R. Hollister at 513-792-0301 or [comment@lmkohn.com](mailto:comment@lmkohn.com).

## **Financial Information (Item 18)**

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### **Financial Condition**

LMK 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 LMK does not serve as a custodian for client funds or securities, other than as described above, and does not require prepayment of fees of more than \$1,200 per client, six months or more in advance.

## **Business Continuity Plan (19)**

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### **General**

LMK has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

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### **Disasters**

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, fire, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

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### **Alternate Offices**

Alternate work locations are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

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### **Loss of Key Personnel**

LMK has provisions in place for loss of key personnel as part of the Business Continuity Plan.

## **Information Security Program (20)**

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### **Information Security**

LMK maintains an information security program to reduce the risk that personal and confidential information may be breached.

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**Privacy Notice**

We are an independent registered investment advisor, committed to safeguarding the confidential information of our clients. Respect for our client's privacy is critical to the way we do business. Our privacy promise derives from basic principles of trust, ethics and integrity.

The full version of our Privacy Notice is sent to clients within 30 days of signing a New Account form or Customer Acknowledgement form and annually thereafter. Clients may request a copy in advance to signing if they wish. Additionally, the full version of our Privacy Notice is available on our website, [www.lmkohn.com](http://www.lmkohn.com), under Form ADV/Privacy Notice.

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**Brochure Supplement (Part 2B of Form ADV)****Education and Business Standards****Financial Planning and Investment Advisor Qualifications:**

LMK requires that any employee whose function involves determining or giving investment advice to clients must:

1. Hold the SIE along with the Series 6 or Series 7 Securities License. As of 1/1/2006, any registered representative interested in becoming an IAR must first pass the Series 65 or equivalent. A current professional designation such as the Certified Financial Planner, CFP® or the Certified Financial Analyst, CFA® designation may be considered an equivalent to the Series 65 provided that the IAR's home state and states where the IAR conducts business recognize it as such.
2. Subscribe to the Code of Ethics of LMK.
3. Be properly licensed for all advisory activities in which they are engaged.
4. Any material changes, i.e. address changes, disciplinary actions or customer complaints; that occur after an IAR has been registered must be submitted to Carl Hollister, Drew Kohn or Kristin Hobbs so that the information may be updated accordingly. Any IAR who is contemplating servicing a client in a state other than the state(s) they are approved in must contact LMK PRIOR TO entering into any kind of agreement.

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**Professional Certifications**

Investment Advisor Representatives have earned certifications and credentials that are required to be explained in further detail.

**CERTIFIED FINANCIAL PLANNER**

CERTIFIED FINANCIAL PLANNER, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial

planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 8 hours over a one-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing Education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing Education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

#### **OTHER BUSINESS ACTIVITIES:**

LMK is also a registered Broker Dealer, and the officers and other employees of LMK are registered as representatives of the firm. LMK clears all securities transactions through RBC CS on a fully disclosed basis and has engaged RBC CS as its carrying Broker Dealer. Additionally, these persons may be insurance agents or brokers for one or more insurance companies. In their separate capacity as registered representatives of LMK or as insurance agents, these individuals will be able to implement recommended securities or insurance transactions for advisory clients for separate and typical compensation. Clients are not obligated to use these individuals in their separate capacity as independent insurance agents for the implementation of any recommendations.

#001 ..... 10151 Carver Rd. Suite 100  
..... Cincinnati, OH 45242  
..... Doing Business As: L.M. Kohn & Company

**LARRY M. KOHN, born 1953**

**Education:**

- Graduated from Miami University of Ohio in 1976, with a B.A. in Marketing.

**Employment:**

- President and Director of L.M. Kohn & Company from 11/1990 to 9/2017.
- Registered Representative for L.M. Kohn & Company from 11/1990 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 12/1999 to Present.
- Chief Executive Officer of L.M. Kohn & Company from 10/2017 to Present.

**FINRA Series 6, 7, 22, 24, 28, 63 and 65 Exams.**

**Disciplinary Information:**

- 10/23/2006 – Customer allegation regarding trade instruction – Complaint was contested and complainant never responded.
- 7/13/1988 – Customer allegation regarding suitability – Discharged 3/15/1990 – Award to Customer.

**Other Business Activities:**

Larry Kohn, an associated person of LMK that determines general client advice, engages in insurance sales and services. Clients of LMK may be referred to Larry Kohn and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

**#001 (Continued)**

**CARL R. HOLLISTER, born 1966**

**Education:**

- Graduated from Grove City College in 1988 with a B.A. in Economics/Finance.
- Graduated from Webster University in 1993 with a M.A. in Finance.

**Employment:**

- Executive Vice President of L.M. Kohn & Company from 7/1994 to 9/2017.
- Registered Representative for L.M. Kohn & Company from 7/1994 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 12/1999 to Present.
- President of L.M. Kohn & Company from 10/2017 to Present.

**FINRA Series 4, 7, 24, 53, 55, 63 and 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Carl Hollister, an associated person of LMK that determines general client advice, is Board President with the AHEPA #113, Inc., - a non profit senior housing project. He is also an executive Board Member of AHEPA National Housing Corporation Non Profit Senior Housing Corporation and Vice Chairman of the Board of Trustees of the Order of AHEPA.

Carl Hollister, an associated person of LMK, is a committee trustee for the Buckeye Scholarship Foundation.

**#001 (Continued)**

**TIMOTHY SCHWIEBERT, born 1973**

**Education:**

- Graduated from The Ohio State University in 1996 with a BS in Finance.

**Employment:**

- Vice President of Trading for L.M. Kohn & Company from 1/98 to Present.
- Registered Representative for L.M. Kohn & Company from 1/1998 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 4/2006 to Present.

**FINRA Series 4, 7, 24, 55, 63 and 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Tim Schwiebert, an associated person of LMK that determines general client advice, engages in insurance sales and services. Clients of LMK may be referred to Tim Schwiebert and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Tim Schwiebert, an associated person of LMK that determines general client advice, receives income from rental property & is a passive owner in a family farm partnership.



**#001 (Continued)**

**ANDREW KOHN, born 1989**

**Education:**

- Graduated from Miami University in 2013 with a BA in Economics.

**Employment:**

- Registered Representative for L.M. Kohn & Company from 10/2013 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 02/2016 to Present.
- Compliance Manager for L.M. Kohn & Company from 8/2016 to 9/2017.
- Vice President of Compliance for L.M. Kohn & Company from 10/2017 to Present.

**FINRA Series 7, 24 & 63 and CFP Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Andrew Kohn, an associated person of LMK that determines general client advice and assists in servicing client accounts. Clients of LMK may be referred to Andrew Kohn and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

## **#001 (Continued)**

### **MIKE BAGNULO, born 1945**

#### **Education:**

- Graduated from The Virginia Military Institute in 1967 with BA in English.

#### **Employment:**

- Registered Representative with First Citizens Municipal Corporation from 6/1979 to 10/1979.
- Registered Representative with Hereth, Orr & Jones, Inc. from 10/1979 to 12/1983.
- Registered Representative with Bear, Stearns & Co., Inc. from 1/1986 to 7/1986.
- Registered Representative with Swink & Company, Inc. from 1/1984 to 1/1990.
- Registered Representative with American Fronteer Financial Corp. from 1/1990 to 12/2000.
- Registered Representative with Auerback, Pollak & Richardson Inc. from 12/2000 to 8/2001.
- Registered Representative and Investment Advisory Representative with MidSouth Capital Inc. from 8/2001 to 1/2012.
- Registered Representative with L.M. Kohn & Company from 1/2012 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 1/2012 to Present.

#### **FINRA Series 4, 7, 24, 63 and 65 Exams.**

##### **Disciplinary Information:**

- 5/10/1986 – Customer Allegation – Unauthorized trading– Settled – Payment to Claimant.
- 3/28/1990 – Rule Violation – Payment to Claimant, Censure Monetary Fine & Suspension – Resolved 7/3/1991.
- 7/5/1998 – Customer Allegation – Misrepresenting a bond – Dismissed from Charge, RAF Financial  
Compensated client.

#### **Other Business Activities:**

Mike Bagnulo, an associated person of LMK that determines general client advice, Clients of LMK may be referred to LA and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

**#001 (Continued)**

**JOHN W. DURANT, born 1959**

**Employment:**

- Bank of America Investment Services from 04/2004 to 03/2008.
- Bank of America Insurance Services from 04/2004 to 09/2010.
- JHS Capital Advisors, Inc. from 09/2010 to 08/2015.
- Ameriprise Financial Services, Inc. from 08/2015 to 09/2017.
- Registered Representative with L.M. Kohn & Company from 09/2017 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 09/2017 to Present.

**FINRA Series 7 and 66 Exams.**

**Disciplinary Information: NONE**

**Other Business Activities:**

John Durant, an associated person of LMK that determines general client advice, engages in insurance sales and services. Clients of LMK may be referred to John Durant and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

#001.....2229 Packard Street Suite 3  
.....Ann Arbor, MI 48104  
.....Doing Business As: Ann Arbor Center for Financial Services LLC.

**G. PHIL ZEPEDA, Born 1948**

**Education:**

- Graduated from Dans Scotus College – 1971 – BA
- Graduated from University of Detroit – 1973 – MA
- College for Financial Planning – 1996
- Also attended Harvard, Wharton, University of Chicago, University of Michigan, Loyola Chicago and St. Francis University

**Employment:**

- Registered Representative Zepeda & Associates from 1/2008 to 4/2015.
- Registered Representative Raymond James Financial Services Inc. from 1/1986 to 12/2017.
- Registered Representative Raymond James Financial Services Advisors Inc. from 5/2010 to 12/2017.
- Employee at AD Astra Tax / Financial, Inc. from 10/2005 to Present.
- Owner at Zepeda Properties, LLC. From 1/2008 to present.
- Registered Representative with L.M. Kohn & Company from 12/2017 to Present
- Investment Advisory Representative with L.M. Kohn & Company from 12/2017 to Present.

**FINRA Series 1,7,24,63 & CFP Exams.**

**Disciplinary Information:**

None.

**Other Business Activities:**

G. Phil Zepeda, an associated person of LMK that determines general client advice and securities products under the name of Ann Arbor Center for Financial Services LLC. (AACFFS), a branch office of LMK. Clients of LMK may be referred to AACFFS and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

G. Phil Zepeda, an associated person of LMK also is and employee at AD Astra Tax / Financial, Inc. doing tax advisory and insurance sales. He will be conducting this business during market hours.

G. Phil Zepeda, an associated person of LMK also is and owner of Zepeda Properties, LLC doing real estate office rental. He will not be conducting this business during market hours.

#001 ..... One West Court Square, Suite 750  
..... Decatur, GA 30030  
..... Doing Business As: Art Rosser Financial Services Group

**ARTHUR ROSSER, born 1971**

**Education:**

- Graduated- Central Missouri State University in 1992.

**Employment:**

- Owner of Art Rosser Photography Inc. from 5/1995 to 7/2006.
- Registered Representative with Edward Jones from 7/2006 to 2/2011.
- Registered Representative and Investment Advisory Representative with MidSouth Capital Inc. from 3/2011 to 1/2012.
- Registered Representative with L.M. Kohn & Company from 1/2012 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 1/2012 to Present.

**FINRA Series 7 and 66 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Arthur Rosser, an associated person of LMK that determines general client advice, sells securities and insurance products under the name of Art Rosser Financial Services Group (ARFSG) which offers insurance and financial services. Clients of LMK may be referred to ARFSG and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Arthur Rosser, an associated person of LMK that determines general client advice is a Landlord for 1099 GBC LLC., a property.

#001 ..... 14806 Floyd  
..... Overland Park, KS 66223  
..... Doing Business As: A. Turner Financial, LLC

**ALAN TURNER, born 1961**

**Education:**

- Attended Missouri Western University 1980 through 1984.

**Employment:**

- Financial Consultant for RBC Capital Markets Corporation from 01/2002 to 04/2009.
- Registered Representative for L.M. Kohn & Company from 5/2009 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 5/2009 to Present.

**FINRA Series 7 and 66 Exams.**

**Disciplinary Information:**

- 8/28/2009 Bankruptcy – Discharged 12/2/2009 – No action pending.
- 5/24/2005 Bankruptcy – Discharged 7/25/2005 – No action pending.

**Other Business Activities:**

Alan Turner, an associated person of LMK that determines general client advice, is also the owner of A. Turner Financial, LLC (ATF), an insurance and investment planning company. Clients of LMK may be referred to (ATF) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Alan Turner, an associated person of LMK that determines general client advice, also engages in acting and modeling activities for Talent Unlimited, which is an agency that is not publicly traded.

#001 .....300 Congress Suite 104  
.....Quincy, MA 02169  
.....Doing Business As: Butler Benefit Brokers, Inc.

**RICHARD BUTLER, born 1948**

**Education:**

- Graduated from Northeastern in 1971 with BS in Accounting.
- Attended Suffolk University for MBA.
- Also received CLU and ChFC from American College.

**Employment:**

- Insurance Broker with Richard Butler Agency from 8/82 to 1/96.
- Representative with Jefferson Pilot Securities Corp. from 1/85 to 3/99.
- Owner/President of Butler & Barron Ins. from 1/96 to 11/05.
- Registered Representative with L.M. Kohn & Company from 3/99 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 2/11 to Present.

**FINRA Series 6, 22, 63 and 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Richard Butler, an associated person of LMK that determines general client advice, is owner of Butler Benefit Brokers, Inc. (BBB) which is a company that offers insurance and financial planning. Clients of LMK may be referred to (BBB) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

#001.....4965 U.S. Highway 42 Suite 1000  
.....Louisville, KY 40222  
.....Doing Business As: Carpenter Wealth Management

**THOMAS CARPENTER, born 1969**

**Education:**

- Graduated from the University of Florida in 1991 with Bachelor of Science, Business Administration.
- Graduated from Georgetown University in 1998, with Masters of Business Administration.
- Earned Chartered Financial Analyst (CFA) designation in 2004.

**Employment:**

- J.J.B. Hilliard, W.L. Lyons, Inc. from 07/2000 to 09/2010.
- PNC Bank from 09/2010 to 04/2013.
- BB&T from 05/2013 to 08/2013.
- Unemployed from 09/2013 to 10/2013.
- Registered Representative with Fifth Third Securities from 11/2013 to 5/2016.
- Registered Representative with L.M. Kohn & Company from 06/2016 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 06/2016 to Present.

**FINRA Series 7, 63 and 87 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Thomas Carpenter, an associated person of LMK that determines general client advice, is also the owner of Carpenter Wealth Management (CWM), which is a company that offers insurance and financial planning. Clients of LMK may be referred to this company and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.



#001 ..... 171 Londonderry Turnpike  
.....Hooksett, NH 03106  
.....Doing Business As: CGI Wealth Management, LLC

**MATTHEW GENNETTI, born 1991**

**Education:**

- Graduated from Saint Anselm College

**Employment:**

- Sales Intern at Boston Partners Financial Group from 01/2013 – 05/2013.
- Member Service Representative Bellwether Community Credit Union from 03/2010 – 08/2013.
- Registered Representative with L.M. Kohn & Company from 09/2013 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 09/2013 to Present.

**FINRA Series 6, 63, & 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Matthew Gennetti, an associated person of LMK, offers clerical support, provides general client advice and services, and is an employee of CGI Wealth Management, LLS. (CGI), an insurance and employee benefits firm. Clients of LMK may be referred to (CGI) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

**#001 (Continued)**

**RYAN L. MCLAUGHLIN, born 1977**

**Education:**

- Graduated from the University of New Hampshire in 1999 with a BA in Sociology.

**Employment:**

- Sales Representative with Metlife Securities from 9/1999 to 6/2000.
- Sales and Marketing Representative with Putnam Investments from 5/2000 to 2/2003.
- Independent Contractor with the Dawn Chambers Agency from 3/2003 to 9/2003.
- Account Executive with Cronin & Gervino from 10/2003 to Present.
- Registered Representative with L.M. Kohn & Company from 3/2004 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 1/2005 to Present.

**FINRA Series 6, 7, 24, 63, 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Ryan McLaughlin, an associated person of LMK that determines general client advice is an employee of CGI Wealth Management, LLC. (CGI), an insurance and employee benefits firm. Clients of LMK may be referred to (CGI) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Ryan McLaughlin, an associated person of LMK that determines general client advice is also is associated with personal real estate rentals.

#001 .....300 Church Street  
.....LaGrange, GA 30240  
.....Doing Business As: Charter Investment Services

**CHASE HALL, born 1988**

**Education:**

Graduated from LaGrange College with a BA in history

**Employment:**

- Duquette Trim and Millwork, Inc. from 09/2006 to 01/2010
- LaGrange College from 08/2006 to 04/2010
- First United Methodist Church from 08/2007 to 05/2010
- Tim Brown's Lawn Care from 05/2004 to 09/2010
- Brian Haught from 07/2010 to 09/2010
- KIA Motors from 9/2010 to 11/2016
- Financial Advisor at Edward Jones from 11/2016 to 10/2018
- Registered Representative with L.M. Kohn & Company from 10/2018 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 10/2018 to Present.

**FINRA Series 7 and 66 Exams.**

**Disciplinary Information: NONE**

**Other Business Activities:**

Chase Hall, an associated person of LMK that determines general client advice and securities products is an employee of Charter Investment Services (CIS) also does volunteer work for Rotary Club of LaGrange, First Choice Women's Center, United Way of West Georgia and LaGrange-Troup County Warming Center.

#001 ..... 18 North Fort Thomas Ave. Suite 107  
..... Fort Thomas, KY 41075  
.....Doing Business As: Citizens Financial Services

**THOMAS TRUESDELL, born 1946**

**Education:**

- Graduated from Northern Kentucky University in 1973 with a BS in Business Administration

**Employment:**

- Investment Advisory Representative with Cambridge Investment Research Advisors, Inc. from 3/2005 to 6/2005.
- Registered Representative with Cambridge Investment Research, Inc. from 5/2001 to 6/2005.
- Registered Representative with Mutual Service Corp from 10/2000 to 05/2001.
- Registered Representative for L.M. Kohn & Company from 6/2001 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 6/2001 to Present.

**FINRA Series 7, 31, 63, and 65 Exams**

**Disciplinary Information: None**

**Other Business Activities:**

Thomas Truesdell, an associated person of LMK that determines general client advice, uses a DBA, Citizens Financial Services (CFS). Clients of LMK may be referred to (CFS) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

#001/#020 .....10151 Carver Rd. Suite 100  
.....Cincinnati, OH 45242  
.....Doing Business As: Cyr Financial Services / Sharefax Financial Services

**BRUCE T. CYR, born 1950**

**Education:**

- Graduated from the University of Southern Maine in 1976 with an B.A. in French

**Employment:**

- Registered Representative for L.M. Kohn & Company from 12/2000 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 08/2017 to Present.

**FINRA Series 1, 63 and 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Bruce T. Cyr, an associated person of LMK that determines general client advice, sells insurance and securities products under the name of Cyr Financial Services / Sharefax Financial Services (CFS/SFS), an insurance and financial planning company and a branch office of LMK. Clients of LMK may be referred to CFS/SFS and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Bruce T. Cyr, an associated person of LMK that determines general client advice also performs seasonal maintenance work for an indoor tennis club.

#001 ..... 210 East Drinker Street  
..... Dunmore, PA 18512  
.....Doing Business As: Conway Financial Group

**JOHN “JACK” CONWAY, born 1961**

**Education:**

- Graduated from Kutztown University of PA in 1983 with a BS in Business Administration.
- Graduated from Maryland University in 1981 with an MBA in Finance.

**Employment:**

- Registered Representative with Butcher & Singer, Inc. from 7/1987 to 7/1988.
- Registered Representative with Prudential Securities Inc. from 8/1988 to 2/1995.
- Registered Representative with First Securities Investments Inc. from 2/1995 to 3/2005.
- Registered Representative and Investment Advisory Representative with MidSouth Capital Inc. from 4/2005 to 1/2012.
- Registered Representative with L.M. Kohn & Company from 2/2012 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 2/2012 to Present.

**FINRA Series 7, 24, 63 and 65 Exams.**

**Disciplinary Information:**

- 8/21/1997 – Customer allegation – settled 5/19/1998- award to Claimant paid by Prudential – No dollars paid by rep.

**Other Business Activities:**

Jack Conway, an associated person of LMK that determines general client advice, is owner of Conway Financial Group (CFP). Clients of LMK may be referred to CFP and vice versa, no referral fees of any kind will be paid by either party for said referrals versa.

Jack Conway, an associated person of LMK that determines general client advice, is also an Adjunct Professor at Marywood University.

#001 ..... 727 N. Waco Suite 270  
..... Wichita KS 67203  
..... Doing Business As: Dave Stalker Financial Group

**DAVID STALKER, born 1939**

**Employment:**

- Registered Representative for L.M. Kohn & Company from 11/2007 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 01/2018 to Present.

**FINRA Series 1,12,63 & 65 Exams.**

**Disciplinary Information:**

- 02/27/2007: Representative was discharged from Northwestern Mutual Investment Services after admitting to signing a customer's name on a delivery document for a non variable insurance product.

**Other Business Activities:**

David Stalker, an associated person of LMK that determines general client advice, sells securities products under the name of Dave Stalker Financial Group (DSFG), an insurance and financial planning company and a branch office of LMK. Clients of LMK may be referred to DFSG and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

David Stalker, an associated person of LMK that determines general client advice is also one quarter share as a member of the blue sky investment club. David is not a rep on this investment club account.

# 001 ..... 70 West 40<sup>th</sup> St. 8<sup>th</sup> Floor  
..... New York, NY 10018  
..... Doing Business As: Gelman Pension Consulting Inc.

**DAVID GELMAN, born 1953**

**Education:**

- Graduated from York College of the City University of New York with a Bachelor of Science in Mathematics in 1975
- Graduated from New York University Graduate School of Business with a Master of Science in Quantitative Analysis in 1978

**Employment:**

- Owner of Cornerstone Investments, Inc. from 03/1998 to present.
- Owner of Gelman Pension Consulting Inc. from 10/1990 to present.
- Registered Representative for L.M. Kohn & Company from 07/2001 to present.
- Registered Representative for L.M. Kohn & Company from 04/2016 to present.
- Investment Advisory Representative for L.M. Kohn & Company from 04/2016 to present.

**FINRA Series 6, 63 & 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

David Gelman, an associated person of LMK is the owner of Gelman Pension Consulting Inc. (GPC), which is a branch office of LMK that offers insurance and financial services. Clients of LMK may be referred to GPC and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

David Gelman, an associated person of LMK determines insurance advice under the name of Cornerstone Investments, Inc. (CII). Clients of LMK may be referred to CII and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.



#001.....One Sheakley Way.  
..... Cincinnati, OH 45246  
.....Doing Business As: Group Plans Insurance Agency, Inc., a Division of Sheakley

**CARRIE A. LUCAS, born 1979**

**Employment:**

- Investacorp Inc. 05/2008 to 08/2012.
- Lincoln Financial Advisors 08/2012 to 01/20/17
- Sheakley 07/1998 to present.
- Registered Representative for L.M. Kohn & Company from 01/2017 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 05/2018 to Present.

**FINRA Series 6, 63 and 65 Exams.**

**Disciplinary Information:**

None

**Other Business Activities:**

Carrie Lucas, an associated person of LMK that determines general client advice, engages in insurance and TPA business sales and services through Sheakley. Clients of LMK may be referred to Sheakley and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

#001 .....4350 Brownsboro Rd. Suite 110  
.....Louisville, KY 40207  
..... Doing Business As: JLA Capital LLC.

**JEFFREY ADKINS, born 1962**

**Education:**

- Graduated from the University of Tennessee 1989 with a BS in Ag Economics.
- Graduated from the University of Tennessee 1991 with a MS in Applied Economics.

**Employment:**

- Financial Consultant with Merrill Lynch, Pierce, Fenner & Smith Inc. from 9/1993 to 3/1994.
- Investment Consultant with PNC Brokerage Corp. from 4/1994 to 3/1995.
- Investment Consultant with Banc One Securities Corp. from 3/1995 to 1/2002.
- Financial Advisor with UBS Financial Services from 1/2002 to 6/2009.
- Registered Representative with First Kentucky Securities Corp. from 6/2009 to 3/2011.
- Registered Representative with L.M. Kohn & Company from 3/2011 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 3/2011 to Present.

**FINRA Series 7, 24, 63 & 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Jeffrey Adkins, an associated person of LMK that determines general client advice, is also an owner of JLA Capital, LLC (JLAC), which is a company that offers insurance and financial planning. Clients of LMK may be referred to this company and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

#001 ..... 6200 West 9<sup>th</sup> St., Unit 3  
.....Greeley, CO 80634  
.....Doing Business As: L.M. Kohn & Company

**WILLIAM BOLANDER, born 1950**

**Education:**

- Attended UNC 1968-1969.
- Attended AIMS College 1969, 1973-1974.

**Employment:**

- Registered Representative with Central Discount Stockbrokers, Inc. from 2/01 to 8/03.
- Registered Representative with RMIN Securities, Inc. from 8/03 to 5/05.
- Registered Representative for L.M. Kohn & Company from 5/05 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 6/07 to Present.

**FINRA Series 7, 24, 63 and 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

William Bolander, an associated person of LMK that determines general client advice, engages in security and insurance sales and services. Clients of LMK may be referred to William Bolander and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

William Bolander, an associated person of LMK that determines general client advice, is also on the Board of Directors for The Calvary Chapel.

#001 ..... 1000 N. Magnolia Ave.  
..... Orlando, FL 32803  
..... Doing Business As: L.M. Kohn & Company

**JOHN B. HAMPTON III, born 1965**

**Education:**

- Graduated from University of Florida in 1988 with a BS in Business Administration.

**Employment:**

- Registered Representative with Janney Montgomery Scott, Inc. from 10/1999 to 10/2002.
- Registered Representative with Raymond James Financial Services, Inc. from 10/2002 to 4/2005.
- Registered Representative with J.W. Cole Financial, Inc. from 4/2005 to 8/2009.
- Registered Representative with Pinnacle Financial Group, LLC from 11/2009 to 9/2010.
- Registered Representative for L.M. Kohn & Company from 9/2010 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 1/2012 to Present.

**FINRA Series 7, 63 and 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

John Hampton, an associated person of LMK that determines general client advice, engages in insurance sales and services. Clients of LMK may be referred to John Hampton and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

#001 ..... 6132 Dorsett Place  
..... Wilmington, NC 28403  
.....Doing Business As: L.M. Kohn & Company

**WAYNE VAUGHAN, born 1938**

**Education:**

- Graduated- The University of Alabama in 1961 with a Bachelor's degree in business.

**Employment:**

- Registered Representative with F.I. Dupont GloreForgan & Co. from 7/1970 to 8/1972.
- Registered Representative with Drexel Burnham & Co., Inc. from 3/1972 to 0/1972.
- Registered Representative with Dean Witter & Co., Inc. from 1/1997 to 2/1978.
- Registered Representative with Dean Witter Reynolds Co., Inc. from 2/1978 to 4/1978.
- Registered Representative with J.C. Bradford & Co. from 1/1978 to 6/1979.
- Registered Representative with Loeb Partners from 7/1979 to 11/1979.
- Registered Representative with Bache Halsey Stuart Shields Inc. from 11/1979 to 2/1981.
- Registered Representative with Lehman Brothers Kuhn Loeb Inc. from 2/1981 to 3/1982.
- Registered Representative with Shearson/American Express Inc. from 3/1982 to 7/1983.
- Registered Representative with Morgan Keegan & Co., Inc. from 7/1983 to 4/1984.
- Registered Representative with PayneWebber Inc. from 4/1984 4/1989.
- Registered Representative with Prudential Securities Inc. from 4/1989 to 4/1992.
- Registered Representative with Oppenheimer & Co., Inc. from 5/1992 to 8/1993.
- Registered Representative with Raymond James & Associates, Inc. from 8/1993 to 11/1996.
- Registered Representative with Atkisson, Carter, & Akers, Inc. from 12/1996 to 3/1999.
- Registered Representative with Atkisson, Carter & Company, Inc. from 6/1999 to 11/2003.
- Registered Representative and Investment Advisory Representative with MidSouth Capital Inc. from 10/2003 to 1/2012.
- Registered Representative with L.M. Kohn & Company from 1/2012 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 1/2012 to Present.

**FINRA Series 1, 7, 63 and 65 Exams.**

**Disciplinary Information:**

- 10/16/1995 – Failure to supervise – Payment to claimant- settled- Resolved 10/22/1996.
- 12/11/1995 – Customer Allegation – Unsuitable trading - Payment to claimant- Settled.
- 12/18/1996 – Customer Allegation – Unsuitable trading - Censure & Suspension - Resolved

**Other Business Activities: None**

#001 .....2150 Butterfield Dr. Suite 200  
..... Troy, MI 48084  
..... Doing Business As: LM Kohn North

**ZACHARY CHEROCCI, IV, born 1991**

**Education:**

- Graduated from Hillsdale College in 2014 .

**Employment:**

- Employee for Signature Press from 5/2010 to 8/2010.
- Employee for Instafloral from 5/2011 to 8/2013.
- Ameriprise Financial Services Inc. from 6/2013 to 12/2015.
- Employee for Brother Rice High School from 6/2014 to present.
- Registered Representative for L.M. Kohn & Company from 1/2016 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 1/2016 to Present.

**FINRA Series 7 and 66 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Zachary Cherocci, an associated person of LMK that determines general client advice under the name of LM. Kohn North (LMKN), which is an OSJ branch office of LMK that offers insurance and financial services. Clients of LMK may be referred to LMKN and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Zachary Cherocci, an associated person of LMK that determines general client also coaches football at Brother Rice High School.

**(#001 continued)**

**BRADLEY LOTT, born 1971**

**Education:**

- Graduated from University of West Florida in 1996 with a Bachelor of Science in Business Administration with a concentration in Finance

**Employment:**

- Registered Representative with Dean Witter Reynolds, Inc. from 04/1997 – 11/1998
- Registered Representative with UBS Financial Services from 10/1998 – 01/2007
- Registered Representative with Citigroup Global Markets, Inc. from 01/2007 – 06/2009
- Registered Representative with Morgan Stanley Smith Barney from 06/2009 – 09/2011
- Registered Representative with Wells Fargo Advisors, LLC from 08/2011 – 06/2014
- Registered Representative with L.M. Kohn & Company from 06/2014 – present.
- Investment Advisory Representative with L.M. Kohn & Company from 06/2014 – present.

**FINRA Series 7, 31, 63 and 65 Exams.**

**Disciplinary Information:**

- 5/27/2016 – Chapter 11 Bankruptcy - Reorganization filed to address obligations unrelated to any customer. Final Decree entered, administratively closing case.
- 7/17/2013 – Customer Dispute – Closed – Attorney for the beneficiary alleges that Wells Fargo documented the beneficiary designation incorrectly. Case was denied and Bradley Lott was found to not be responsible for any wrongdoing.
- 10/17/2011 – Customer Dispute – Settled - Claimant alleges representative made misleading statements related to status and beneficiary of claimant's mother's account from 2001-2009. In addition, she claimed that she was given misleading statements regarding her status as a beneficiary on her mother's account. The same claimant sued 3 people on this issue: 1) UBS; 2) the lawyer who Andrew up her mother's will; 3) and Bradley Lott. UBS settled for \$131,000, the lawyer, Clay Geitmann, settled for an undisclosed amount and Bradley Lott opted to go to trial, as he emphatically denied any wrongdoing. On February 17, 2011, plaintiff filed case #15670 in the 9th Judicial District Court in Teton County, Wyoming, alleging fraud by not informing the plaintiff that her mother wanted to take the money the mother had saved herself and move it out of a joint account into her own account for the purposes of drawing up a will that would not include her daughter, as they had had a severe falling out for many years that was worsening. Bradley Lott observed client/broker privilege with the admitted owner of the funds, Mrs. Sprinkle, and honored her wishes to not inform her daughter of her plans. The daughter claims this was fraud, though she admitted in the trial that the funds were her mother's to do with as she pleased. The jury at the trial ultimately ruled that the plaintiff's claims were barred due to a statute of limitations. The plaintiff then appealed to the supreme court of Wyoming, contending that the trial court erred in allowing jury instructions on the plaintiff's negligence and comparative fault and by permitting certain instructions pertaining to the statute of limitations. The Supreme Court found by decision on 4/11/14 that the evidence did not

support a finding that the plaintiff could have discovered the fraud sooner and erred by dismissing the case on the statutes of limitations. Accordingly, the case was remanded for a new trial. Bradley Lott traveled to Denver, Colorado to attend a mediation to settle this case in September 2014. The case was settled with an undisclosed amount being paid to the client.

- 08/27/2009 – Customer Dispute – Closed – Client alleged unauthorized trades with respect to liquidation go assets. The court went to trial and the judge noted the plethora of notes and paperwork provided by Bradley Lott. The case was dismissed as without merit.
- 04/11/2005 – Customer Dispute – Closed – Customer alleges that Bradley Lott failed to follow his instructions to sell Munder Net Fund in 2000. Case was also found to be without merit and was denied.

#### **Other Business Activities:**

Bradley Lott, an associated person of LMK that determines general client advice under the name of LM. Kohn North (LMKN), which is an OSJ branch office of LMK that offers insurance and financial services. Clients of LMK may be referred to LMKN and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Bradley Lott, an associated person of LMK that determines general client also owns Monaco Properties, LLC rental property.



**(#001 continued)**

**KIRK LOVE, born 1955**

**Education:**

- Graduated from Central Michigan University - 1977

**Employment:**

- Registered Representative of Merrill Lynch, Pierce, Fenner & Smith from 08/2006 – 01/2018.
- Registered Representative of Bank of America from 06/2011 – 01/2018.
- Registered Representative with L.M. Kohn & Company from 01/2018 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 01/2018 to Present .

**FINRA Series 7, 63 and 65 Exams.**

**Disciplinary Information:**

- 01/11/1990: Confusion regarding verbal instructions as to the exact date to stop trading. Confusion culminated in a loss of \$20,050. Mr. Love and partners paid the settlement amount.
- 12/17/1990: Claimant alleges that risks involved in an options strategy by EF Hutton were misrepresented. Alleged damages \$179,745. Settlement \$86,000. Settled. Mr. Love did not pay any of the settlement, left E.F. Hutton in 1987 before settlement took place.

**Other Business Activities:**

Kirk Love, an associated person of LMK that determines general client advice under the name of LM. Kohn North (LMKN), which is an OSJ branch office of LMK that offers insurance and financial services. Clients of LMK may be referred to LMKN and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Kirk Love, an associated person of LMK that determines general client advice, sells securities and insurance products under the name of LM Kohn North (LMKN), also has a rental house in Bahamas.

**(#001 continued)**

**DAVID RUBENSTEIN, born 1962**

**Education:**

- Graduated from Lawrence Technological University

**Employment:**

- H&R Block Financial Advisors, Inc. from 08/2002 to 10/2009
- Ameriprise Financial Services, Inc. from 10/2009 to 07/2015.
- Wells Fargo Advisors Inc. from 07/2015 to 04/2016.
- Registered Representative with L.M. Kohn & Company from 05/2016 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 06/2016 to Present.

**FINRA Series 7, 63 and 65 Exams.**

**Disciplinary Information:**

- 04/11/2016 – Discharged after discussions regarding a review conducted at prior employer in which he was permitted to resign while under review for violation of company policy related to the unauthorized use of discretion.
- 07/29/2015 – Resigned while under review for company policy violation related to unauthorized use of discretion.
- 05/13/2002 – Customer allegation is that they were not given all the information regarding the product – Was denied. Case closed.

**Other Business Activities:**

David Rubenstein, an associated person of LMK that determines general client advice under the name of LM. Kohn North (LMKN), which is an OSJ branch office of LMK that offers insurance and financial services. Clients of LMK may be referred to LMKN and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

**(#001 continued)**

**FRED SULTAN, born 1947**

**Education:**

- Graduated from Indiana State University in 1970 with a Bachelors of Science degree.
- Graduated from Detroit College of Law in 1974 with a Juris Doctor degree.

**Employment:**

- Registered Representative with E.F. Hutton & Company from 8/1983 to 2/1988.
- Registered Representative with Shearson Lehman Hutton Inc. from 2/1988 to 1/1990.
- Registered Representative with Morgan Stanley DW Inc. from 1/1990 to 5/2004.
- Registered Representative and Investment Advisory Representative with Leonard and Company from 5/2004 to 7/2012.
- Registered Representative with L.M. Kohn & Company from 7/2012 to present.
- Investment Advisory Representative with L.M. Kohn & Company from 7/2012 to present.

**FINRA Series 3, 7, 24, 63 and 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Fred Sultan, an associated person of LMK that determines general client advice under the name of LM. Kohn North (LMKN), which is an OSJ branch office of LMK that offers insurance and financial services. Clients of LMK may be referred to LMKN and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

#001 ..... 3710 N. Ridgewood Suite D  
..... Wichita, KS 67220  
..... Doing Business As: Preferred Pension Solutions

**PATRICIA CLARK, born 1956**

**Education:**

- Attended Central Business College from 1975-1977.

**Employment:**

- Manager, Pension Service of Manning & Smith Insurance from 10/1996 to 6/2002.
- Manager, Pension Service of A.J. Gallagher from 6/2002 to 5/2003.
- Registered Representative for L.M. Kohn & Company from 5/2003 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 5/2003 to Present.

**FINRA Series 6, 63 and 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Patricia Clark, an associated person of LMK that determines general client advice, is also an Owner of Preferred Pension Solutions (PPS), which is an organization that administers qualified retirement plans. Clients of LMK may be referred to Preferred Pension Solutions and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Parade

#001 ..... 300 E. Bremer Ave. Suite 220  
..... Waverly, IA 50677  
..... Doing Business As: Paradigm Benefits, LLC

**KARI J. SCHAFFER, born 1968**

**Education:**

- Graduated from the University of Iowa in 1991 with a BBA in Finance.

**Employment:**

- Administrator/Compliance Analyst/Assistant Manager & Training Manager for the Principal Financial Group from 5/1991 to 10/1998.
- Registered Representative at Principal Financial Group from 11/2000 to 7/2001.
- Director of Retirement Plan Services for Paradigm Benefits, LLC of Paradigm Benefits, LLC from 11/1998 to Present.
- Registered Representative for L.M. Kohn & Company from 7/2001 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 7/2001 to Present.

**FINRA Series 6,7, 63 and 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Kari Schaffer, an associated person of LMK that determines general client advice, is Director of Retirement Plan Services for Paradigm Benefits, LLC (PB), a pension administrator. Clients of LMK may be referred to PB and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

#001 ..... 2229 Packard St. Suite 3  
..... Ann Arbor, MI 48104  
..... Doing Business As: Pilot Wealth Management

**CHRISTOPHER F. RUEGER, born 1973**

**Education:**

- Graduated from Embry-Riddle Aeronautical University in 1999.

**Employment:**

- Registered Representative Sky Investments / National Planning from 9/2002 – 08/2007.
- Registered Representative Edward Jones from 8/2007 – 7/2013.
- Registered Representative Sigma Financial Corp. from 8/2013 – 12/2013.
- Registered Representative International Assets Advisory from 1/2014 – 1/2014.
- Registered Representative with L.M. Kohn & Company from 2/2014 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 2/2014 to Present.

**FINRA Series 7 & 66 Exams.**

**Disciplinary Information:**

- 07/2013- Discharged from Edward Jones for failure to disclose an outside business activity and for not providing complete information to the firm during an internal investigation.
- 07/2013- Short sale – Paid in full per acceptance agreement by Huntington Bank.

**Other Business Activities:**

Christopher Rueger, an associated person of LMK that determines general client advice and securities products under the name of Pilot Wealth Management (PWM), a branch office of LMK. Clients of LMK may be referred to PWM and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Christopher Rueger, an associated person of LMK also is a Real Estate - Loan Guarantor at Course Financial, LLC. He will not be conducting this business during market hours.

#001 ..... 70 W. Franklin St. Suite D  
..... Centerville, OH 45459  
..... Doing Business As: Private Wealth & Retirement Services, Inc.

**VINCENT DIPIETRO, born 1957**

**Education:**

- Graduated from University of Dayton in 1979 with BA in Psychology.
- Attended University of Dayton Graduate School 1979-1981.

**Employment:**

- Representative with Morgan Stanley from 10/2000 to 2/2005.
- Representative with Royal Alliance Associates, Inc. from 2/2005 to 12/2010.
- Owner of Private Wealth & Retirement Services, Inc. from 1/2011 to Present.
- Registered Representative with L.M. Kohn & Company from 3/2011 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 1/2012 to Present.

**FINRA Series 7, 24, 63 and 65 Exams.**

**Disciplinary Information:**

- 1/1/1992 – Customer allegation – Misrepresented unsuitable limited partnership purchases - settled 6/1/1992- award to Claimant.
- 9/5/2006 – Lien – IRS – Pending.

**Other Business Activities:**

Vincent DiPietro, an associated person of LMK that determines general client advice, is owner of Private Wealth Retirement Services. (PWRS) which is a company that offers insurance and financial planning. Clients of LMK may be referred to (PWRS) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

#001 .....50 Energy Dr. Suite 201  
.....Canton, MA 02021  
.....Doing Business As: Qualified Pension Services, Inc.

**RICHARD ETLING, born 1943**

**Education:**

- Graduated from: University of Bridgeport

**Employment:**

- Employee for QPSI Financial Services from 06/1988 to Present.
- Registered Representative for L.M. Kohn & Company from 01/2002 to Present.
- Registered Representative and Investment Advisory Representative for L.M. Kohn & Company from 01/2017 to Present.

**FINRA Series 6, 63, CHFC & CLU Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Richard Etling, an associated person of LMK that determines general client advice under the name of Qualified Pension Services, Inc. (QPSI), a Third Party Administration Business. An administration service company for small business qualified plans. Clients of LMK may be referred to QPSI and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.



#001 ..... 212 East Drinker Street, Suite C  
..... Dunmore, PA 18512  
..... Doing Business As: Robert Bryan Fitzpatrick, P.C.

## **ROBERT FITZPATRICK, born 1947**

### **Education:**

- Graduated from University of Scranton (PA) in 1974 with a BA in English.
- Graduated from University of Scranton (PA) in 1979 with MBA in Finance.

### **Employment:**

- Registered Representative with Thomson McKinnon Securities Inc. from 12/1980 to 1/1982.
- Registered Representative with Prudential Securities from 3/1982 to 10/1997.
- Representative with First Union Capital Markets Corp. from 11/1997 to 10/1999.
- Registered Representative with Wachovia Securities from 10/1999 to 10/2003.
- Vice President of Investments at MidSouth Capital Inc. from 11/2003 to 1/2012.
- Registered Representative with L.M. Kohn & Company from 1/2012 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 1/2012 to Present.

### **FINRA Series 5, 7, 15, 63 and 65 Exams.**

### **Disciplinary Information:**

- 10/21/1993 – 8/5/2006 Prudential Universal Settlement Fund –multiple claims regarding Prudential Securities Sponsored Proprietary Products – awards paid to Claimants by Prudential Securities.
- 5/2/2001 – Customer Allegation – Excessive, unsuitable and unauthorized trading. Settled.
- 7/16/2001 – Customer Allegation – Churning, unsuitability, breach of fiduciary duty and common law fraud. – Award to claimant.
- 8/16/2002 – Customer Allegation – Unsuitable and unauthorized trading. - Settled.
- 2/19/2003 – Customer Allegation – Misappropriation of funds, unauthorized trading and document forgery. Denied – No complaint pending.
- 11/24/2003 – Customer Allegation –Claims broker put life savings in equity markets despite request for diverse portfolio. Award to Claimant.
- 5/28/2004 – Customer Allegation – Unsuitable and un authorized purchase. Settled.
- 9/14/2004 – Customer Allegation – Unsuitability, breach of fiduciary duty and misrepresentation.- Settled
- 10/26/2010 – Customer Allegation – Misrepresentation of the consequences in selling bonds. Denied – No pending complaint.

### **Other Business Activities:**

Robert Fitzpatrick, an associated person of LMK that determines general client advice, is also the owner of Robert Bryan Fitzpatrick, P.C. (RBF), a financial planning company. Clients of LMK may be referred to and vice versa, however, no referral fees of any kind will be paid by either party for said referrals.

Robert Fitzpatrick, an associated person of LMK that determines general client advice, is also on the Board of Directors/Trustees for Scranton Prep School and the Jesuit Prep School of Scranton, PA.

#001 ..... 9200 Montgomery Rd.  
..... Cincinnati, OH 45242  
..... Doing Business As: SureVest Financial, Inc.

**ALAN R. SABATO, born 1951**

**Education:**

- Graduated from the University of Cincinnati in 1974 with a B.B.A. in Business Administration.

**Employment:**

- Owner of SureVest Financial, Inc. from 10/1990 to Present.
- Registered Representative of Berkshire Equity Sales from 5/1992 to 12/2000.
- IAR of Berkshire Management & Research Corp. from 11/1999 to 12/2000.
- Registered Representative for L.M. Kohn & Company from 12/2000 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 12/2000 to Present.

**FINRA 1, 7, 63 and 65 Exams. Chartered Life Underwriter (1983) and Chartered Financial Consultant (1985).**

**Disciplinary Information: None**

**Other Business Activities:**

Alan Sabato, an associated person of LMK that determines general client advice, is the owner of SureVest Financial, Inc. (SF), an insurance agency. Clients of LMK may be referred to SF and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Alan Sabato, an associated person of LMK that determines general client advice, is the owner commercial rental property.

#028 ..... 2205 Trautner Drive Suite 201  
..... Saginaw, MI 48604  
..... Doing Business As: Tanke Financial Group LLC

**EUGENE T. TANKE II, born 1956**

**Education:**

- Graduated from Wayne State University in 1979 with Bachelor of Science in Mechanical Engineering.
- Graduated from University of Chicago Graduate School of Business in 1987 with Masters of Business Administration.

**Employment:**

- Registered Representative with Citigroup Global Markets Inc. from 2/2008 to 6/2009
- Registered Representative with Morgan Stanley Smith Barney from 6/2009 to 2/2011.
- Registered Representative and Investment Advisory Representative with Leonard and Company from 2/2011 to 7/2012.
- Registered Representative with L.M. Kohn & Company from 7/2012 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 7/2012 to Present.

**FINRA Series 7 and 66 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Eugene Tanke, an associated person of LMK that determines general client advice and securities products under the name of Tanke Financial Group (TFG), an insurance and financial planning firm and an OSJ branch office of LMK. Clients of LMK may be referred to (TFG) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

#001 .....4880 36<sup>th</sup> Street NE Suite 203  
.....Grand Rapids, MI 49512  
.....Doing Business As: The Tatlan Group

**LARRY ANDREANO, born 1957**

**Education:**

- Graduated from Youngstown State University (BSBA) and Case Western Reserve University (MBA)

**Employment:**

- UBS Financial Services Inc. from 10/2005 to 4/2009.
- Oppenheimer & Co Inc. from 5/2009 to 11/2010.
- Royal Securities Co. from 11/2001 to 03/2017.
- Registered Representative for L.M. Kohn & Company from 3/2017 to present.
- Investment Advisory Representative for L.M. Kohn & Company from 3/2017 to present.

**FINRA Series 7 & 66 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Larry Andreano, an associated person of LMK that determines general client advice and securities products under the name of The Tatlan Group (TTG), an insurance and financial planning company and a branch office of LMK. Clients of LMK may be referred to TTG and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Larry Andreano, an associated person of LMK that determines general client advice also owns apartments through a company called Sail LLC. This business is not securities related and no time is devoted to it during business hours.

#001 ..... 2755 Juniper Ct.  
..... Troy, MI 48098  
..... Doing Business As: True Harbour Wealth Management

**MARK KELLY, born 1956**

**Education:**

- Attended Goethe Language Institute in Germany.
- Attended University of Vienna.
- Graduated from St. Ambrose University in Iowa with a degree in Economics, German and Business Administration.

**Employment:**

- Registered Representative with A.G. Edwards from 2/1994 to 1/2008.
- Registered Representative with Wachovia Securities, LLC from 1/2008 to 5/2009.
- Registered Representative with Wells Fargo Advisors, LLC from 5/2009 to 5/2012.
- Registered Representative with Royal Securities Company from 5/2012 to 6/2013.
- Registered Representative with L.M. Kohn & Company from 6/2013 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 6/2013 to Present.

**FINRA Series 7 and 66 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Mark Kelly, an associated person of LMK that determines general client advice, is owner of True Harbour Wealth Management LLC and Advisory Group. (THWMAG) which is a company that sells securities and insurance in addition to the investment advisory services offered. Clients of LMK may be referred to (THWMAG) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

#001 .....7961 Washington Woods Dr.  
..... Dayton, OH 45459  
.....Doing Business As: Vision Financial Partners

**DUSTIN BEAM, born 1977**

**Education:**

- Graduated from Wright State University in 2000 with a BS in Finance
- CFP® - Certified Financial Planner Professional Designation achieved in 2008

**Employment:**

- Registered Representative for Citigroup Global Markets, Inc from 07/2000 to 06/2009.
- Registered Representative for Morgan Stanley Smith Barney Inc., from 06/2009 to 08/2010.
- Registered Representative for Triad Advisors, Inc., from 08/2010 to 07/2011.
- Registered Representative for Purshe Kaplan Sterling Investments from 07/2011 to 02/2015.
- Investment Advisor for Pathways Wealth Management, Inc., 08/2010 to present.
- Registered Representative for L. M. Kohn & Company from 02/2015 to present.
- Investment Advisory Representative for L. M. Kohn & Company from 02/2015 to present.

**FINRA Series 7, 31, 63, and 65 Exams**

**Disciplinary Information: None**

**Other Business Activities:**

Dustin B. Beam, an associated person of LMK that determines general client advice, is an Investment Advisory Representative of Vision Financial Partners, LLC (VFP) which is a company that sells securities and offers investment advisory services. Clients of LMK may be referred to (VFP) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Dustin B. Beam, an associated person of LMK that provides general client advice and services, is an Investment Advisory Representative of Pathways Wealth Management, Inc., a Registered Investment Advisory. Clients of Pathways Wealth Management, Inc. may be referred to LMK. However, no referral fees of any kind will be paid by either party for said referrals.

Dustin B. Beam, an associated person of LMK, provides general client advice and services, engages in insurance sales and services. Clients of LMK may be referred to Dustin B. Beam and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

#005 ..... 2794 Mack Rd.  
..... Fairfield, OH 45014  
.....Doing Business As: Lighthouse Agency Inc.

**GREGORY B. BURCH, born 1962**

**Education:**

- Graduated from the University of Cincinnati in 1984 with an A.B. in Business Management.

**Employment:**

- Sales Representative for Lighthouse Agency from 4/1994 to Present.
- Registered Representative for L.M. Kohn & Company from 4/1996 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 4/1996 to Present.

**FINRA Series 6, 26, 63 and 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Gregory Burch, an associated person of LMK that determines general client advice, sells insurance is the President of Lighthouse Agency (LA), an insurance and financial planning company and a branch office of LMK. Clients of LMK may be referred to LA and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Greg Burch, an associated person of LMK that determines general client advice is also the treasurer for The Cincinnati Area Baptist Association.



#009 ..... Towers of Kenwood, 8044 Montgomery Rd., Suite 700  
..... Cincinnati, OH 45236  
..... Doing Business As: Planning Works, LLC

**IRWIN B. SCHEINESON, born 1955**

**Education:**

- Graduated from the University of Cincinnati in 1978 with a B.A. in Finance/Marketing.

**Employment:**

- President of Planning Works, LTD. from 9/97 to Present.
- Registered Representative for L.M. Kohn & Company from 3/1998 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 3/19/98 to Present.

**FINRA Series 6, 7, 22, 24, 63 & 65 Exams. Chartered Financial Consultant (1984).**

**Disciplinary Information: None**

**Other Business Activities:**

Irwin Scheineson, an associated person of LMK that determines general client advice, sells insurance and securities products under the name of Planning Works, LLC. (PW), an insurance and financial planning company and a branch office of LMK. Clients of LMK may be referred to (PW) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

#019 .....2133 Luray Ave.  
..... Cincinnati, OH 45206  
.....Doing Business As: Pension Corporation of America

**JUSTIN SEITZ, born 1981**

**Education:**

- Graduated from Northern Kentucky University in 2006 with a BA in Art and a Minor in Business Administration.

**Employment:**

- Employee with Pension Corporation of America from 1/2002 to Present.
- Registered Representative for L.M. Kohn & Company from 1/2007 to Present.
- Investment Advisory Representative for PCA Investment Advisory Services, Inc. from 1/2010 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 4/2013 to Present.

**FINRA Series 7, 63, and 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Justin Seitz, an associated person of LMK that determines general client advice, is an employee of Pension Corporation of America, a pension administration corporation (PCA) and a branch office of LMK. Clients of LMK may be referred to PCA and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Justin Seitz, an associated person of LMK that determines general client advice, is an Investment Advisory Representative for PCA Investment Advisory Services, Inc., a Registered Investment Advisor, not affiliated with LMK.

#023 ..... 1954 Evelyn Byrd Ave.  
..... Harrisonburg, VA 22801  
..... Doing Business As: Loomis Wealth Management

**WILLIAM CURTIS LOOMIS, III, born 1951**

**Education:**

- Graduated from James Madison University in 1994 with an MBA.

**Employment:**

- Registered Representative for RBC Capital Markets 1981 to 7/2010.
- Registered Representative for L.M. Kohn & Company from 7/2010 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 7/2010 to Present.

**FINRA Series 7, 24, 63 and 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

William C. Loomis III, an associated person of LMK that determines general client advice sells insurance and securities products under the name of Loomis Wealth Management (LWM), a financial planning company and a branch office of LMK. Clients of LMK may be referred to (LWM) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

William C. Loomis III, an associated person of LMK that determines general client advice is also a consultant for PVFOA. Clients of LMK may be referred to PVFOA and vice versa. However, no referral fees of any kind will be paid by either party.

William C. Loomis III, an associated person of LMK that determines general client advice is also a treasurer for Sportswood Country Club.

William C. Loomis III, an associated person of LMK that determines general client advice is also on the Board of Directors for Greater Madison Inc. Clients of LMK may be referred to Greater Madison Inc. and vice versa. However, no referral fees of any kind will be paid by either party.

William C. Loomis III, an associated person of LMK that determines general client advice is also a planning commission member for Rockingham County.

**(#023 continued)**

**WILLIAM CURTIS LOOMIS, IV, born 1975**

**Education:**

- Graduated from Radford & Blue Ridge University in 1994 with an Associate Degree.

**Employment:**

- Registered Representative for RBC Wealth Management from 10/2000 to 7/2010.
- Registered Representative for L.M. Kohn & Company from 7/2010 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 7/2010 to Present.

**FINRA Series 7 and 66 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

William C. Loomis IV, an associated person of LMK that determines general client advice and securities products under the name of Loomis Wealth Management (LWM), a financial planning company and a branch office of LMK. Clients of LMK may be referred to (LWM) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

#024 .....9078 Union Centre Blvd. Suite 350  
..... West Chester, OH 45069  
..... Doing Business As: Kohn Wealth Management Advisors, LLC

**GARRY P. KOHN, born 1961.**

**Education:**

- Graduated from Indiana University in 1983 with a B.S. in Marketing.

**Employment:**

- Vice President of Planning Works LLC. from 9/2001 to 1/2011.
- Owner of Kohn Wealth Management Advisors, LLC 1/2011 to Present.
- Registered Representative for L.M. Kohn & Company from 7/1997 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 7/1997 to Present.

**FINRA Series 6, 7, 24, 53, 63, 65 Exams and CFP Exam.**

**Disciplinary Information: None**

**Other Business Activities:**

Garry Kohn, an associated person of LMK that determines general client advice, sells insurance and securities products under the name of Kohn Wealth Management Advisors LLC (KWMA), a financial planning company and a branch office of LMK. Clients of LMK may be referred to (KWMA) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Garry Kohn, an associated person of LMK that determines general client advice is also involved in Community Service for Rotary International (RI). Clients of LMK may be referred to (RI) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

#025 ..... 521 Barret Ave.  
.....Louisville, KY 40204  
.....Doing Business As: Green & Halliburton

**SANDRA HALLIBURTON, born 1970**

**Education:**

- Graduated from University of Cincinnati, School of Business 1994; Emory – Goizueta School of Business, MBA, 2002

**Employment:**

- Sunset Financial Services from 03/2005 to 06/2007.
- Registered Representative for AXA Advisors, LLC from 6/2007 to 7/2009.
- Registered Representative for Green & Halliburton from 9/2002 to Present.
- Registered Representative for L.M. Kohn & Company from 7/2009 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 3/2017 to Present.

**FINRA Series 6,63 & 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Sandra Halliburton, an associated person of LMK that determines general client advice sells insurance and securities products under the name of Green & Halliburton. (G&H), an insurance and investment planning firm and a branch office of LMK. Clients of LMK may be referred to G&H and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

**(#025 continued)**

**BENJAMIN WILLIAMS, born 1982**

**Education:**

- Graduated the University of Kentucky in 2004 with a degree in Finance.

**Employment:**

- Sales Representative for Jefferson Pilot Life Ins. from 5/2004 to 9/2004.
- Registered Representative for AXA Advisors, LLC from 6/2007 to 7/2009.
- Account Specialist for Green & Halliburton from 9/2004 to Present.
- Registered Representative for L.M. Kohn & Company from 7/2009 to Present.
- Investment Advisory Representative for L.M. Kohn & Company from 7/2009 to Present.

**FINRA Series 7,24 and 66 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Benjamin Williams, an associated person of LMK that determines general client advice sells insurance and securities products under the name of Green & Halliburton. (G&H), an insurance and investment planning firm and a branch office of LMK. Clients of LMK may be referred to G&H and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

#IA033 ..... 323 W. 2<sup>nd</sup> St.  
..... Cedar Falls, IA 50613  
..... Doing Business As: Financial Designs, LLC

**RYAN HANNAM, born 1980**

**Education:**

- Graduated from University of Northern Iowa in 2002 with a B.A. in Accounting.

**Employment:**

- Employed by The Seattle Seahawks from 4/2002 to 4/2006.
- Employed by The Dallas Cowboys from 4/2006 to 03/2007.
- Employed by Peregrine Financial Group from 8/2008 to 7/2012.
- Employed by MB Trading from 8/2012 to 1/2013.
- Registered Representative of Paradigm Benefits, LLC from 5/2013 to Present.
- Registered Representative Financial Designs, LLC from 5/2013 to Present.
- Registered Representative with L.M. Kohn & Company from 5/2013 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 5/2013 to Present.

**FINRA Series 7, 24 and 66 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Ryan Hannam, an associated person of LMK that determines general client advice, is also an owner of Financial Designs, LLC. (FCL), an insurance and employee benefits company. Clients of LMK may be referred to FCL and vice versa, however, no referral fees of any kind will be paid by either party for said referrals.

Ryan Hannam, an associated person of LMK that determines general client advice, is also an owner of Paradigm Benefits, LLC. (FCL), a third party retirement plan administration company. Clients of LMK may be referred to FCL and vice versa, however, no referral fees of any kind will be paid by either party for said referrals.

Ryan Hannam, an associated person of LMK that determines general client advice, is also an owner of rental property investments, through MH Group LLC.

Ryan Hannam, an associated person of LMK that determines general client advice, is an investor in Cole Credit Property Trust IV Investment.



**(#IA033 continued)**

**PAIGE MILLER, born 1979**

**Education:**

- Graduated from University of Northern Iowa

**Employment:**

- Employed by Peregrine Financial Group from 5/2004 to 9/2012.
- Employed by Genesis Financial Technologies from 9/2012 to 5/2013.
- Employed by M. H. Group LLC from 07/2015 to Present.
- Registered Representative of Paradigm Benefits, LLC from 5/2013 to Present.
- Registered Representative Financial Designs, LLC from 5/2013 to Present.
- Registered Representative
- and Investment Advisory Representative with L.M. Kohn & Company from 9/2013 to Present.

**FINRA Series 6, 63 and 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Paige Miller, an associated person of LMK that determines general client advice, is also an owner of Financial Designs, LLC. (FCL), a financial planning company. Clients of LMK may be referred to FCL and vice versa, however, no referral fees of any kind will be paid by either party for said referrals.

Paige Miller, an associated person of LMK that determines general client advice, is also an owner of Paradigm Benefits, LLC. (FCL), a third part administration. Clients of LMK may be referred to FCL and vice versa, however, no referral fees of any kind will be paid by either party for said referrals.

Paige Miller, an associated person of LMK that determines general client advice, is also an owner of rental property investments through MH Group LLC and Woodland Creek Inc.

**(#IA033 continued)**

**SCOTT B. WIRTZ, born 1969**

**Education:**

- Graduated from University of Northern Iowa, 2002

**Employment:**

- Employed by M. Holdings Securities, Inc. from 12/2001 to 4/2013.
- Employed by Eslick Financial Group, Inc. from 11/2006 to 04/2013.
- Employed by Transamerica from 04/2013 to 10/2013.
- Employed by Lincoln Savings Bank from 10/2013 to 09/2017.
- Employed by LPL Financial LLC from 10/2013 to 09/2017.
- Registered Representative with L.M. Kohn & Company from 09/2017 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 09/2017 to Present.

**FINRA Series 6, 7, 63 and 66 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Scott Wirtz, an associated person of LMK that determines general client advice as well as sells insurance, is also an associate of Financial Designs, LLC. (FDL), a financial planning company. Clients of LMK may be referred to FCL and vice versa, however, no referral fees of any kind will be paid by either party for said referrals.

Scott Wirtz, an associated person of LMK & FDL is also on the Board of Directors for Cedar Falls Food Co Op.

#KY030 .....4350 Brownsboro Rd. Suite 110  
.....Louisville, KY 40207  
..... Doing Business As: Aldyn Capital LLC.

**JOHN MCGLYNN, born 1964**

**Education:**

- Graduated from the LeMoyne College 1982-1986 with a BS in Industrial Relations.

**Employment:**

- Financial Advisor with UBS Financial Services Inc. from 5/2001 to 4/2009.
- Registered Representative with First Kentucky Securities Corp. from 4/2009 to 3/2011.
- Registered Representative with L.M. Kohn & Company from 3/2011 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 3/2011 to Present.

**FINRA Series 7, 63 and 66 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

John McGlynn, an associated person of LMK that determines general client advice, is also the owner of Aldyn Capital, LLC (AC), which is a company that offers insurance and financial planning. Clients of LMK may be referred to this company and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

**(#KY030 continued)**

**WILLIAM A NEVIUS II, born 1959**

**Education:**

- Graduated from University of Kentucky

**Employment:**

- UBS Financial Services from 04/2003-09/2010
- Camarda Financial Advisors, LLC from 09/2010 – 12/2011
- Morgan Stanley Smith Barney from 01/2012 – 02/2015
- Morgan Stanley Private Bank, National Assoc. from 01/2015-02/2015
- Registered Representative with L.M. Kohn & Company from 3/2011 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 3/2011 to Present.

**FINRA Series 7 and 66 Exams.**

**Disciplinary information:**

- Criminal Commonwealth Of Kentucky Jefferson Circuit Court. Reckless homicide 1 count felony conviction. Driving while intoxicated 1 count misdemeanor conviction. Charge date 05/12/1984. Disposition date 11/18/1991. Fines were paid and 5 year probation period was completed in 1991.

**Other business activities:**

William Nevius II is an associated person with LMK that offers investment, financial and insurance advisory services to clients. He is a Financial Advisor with Aldyn Capital, LLC (AC), which is an independent financial services firm. Clients of LMK may be referred to AC and vice versa. However, no referral fees of any kind will be paid by either party.

William Nevius II is an associated person with LMK also is the owner of Evans Lane LLC., a Kentucky register LLC.

#MO032..... 12412 Powerscourt Dr. Suite 150  
.....St. Louis, MO 63131  
.....Doing Business As: Millennium Financial

**ROBERT FERGUSON, born 1952**

**EDUCATION:**

Graduated with an AB and MBA from Washington University in 1975 & 1978.

**EMPLOYMENT:**

- Financial Advisor at The Advisors Group from 3/2001 to 10/2003.
- Financial Advisor at Acacia Life Insurance from 10/2003 to 12/2011.
- Financial Advisor at Union Central Life Insurance from 06/2006 to 12/2011.
- Financial Advisor at Birchtree Financial Services, Inc. from 09/1997 to 03/2001.
- Financial Advisor at Ameritas Life Insurance Corp. 10/2003 to 12/2015.
- Financial Advisor at Ameritas Investment Corp. from 10/2003 to 12/2015.
- Registered Representative with L.M. Kohn & Company from 12/2015 to present.
- Investment Advisory Representative with L.M. Kohn & Company from 12/2015 to present

**FINRA Series 3,7, 24, 63 & 65 Exams.**

**Disciplinary Information:**

None

**Other Business Activities:**

Robert Ferguson, an associated person of LMK that determines general client advice, engages in insurance sales and service is an associated person of Millennium Financial (MFG). Clients of LMK may be referred to (MFG) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

**(#MO032 continued)**

**ALEXANDER FERGUSON, born 1989**

**Education:**

Graduated with a BS from Webster University in 2013.

**Employment:**

- Employee at Ameritas Life Insurance Corp. from 02/2014 to 12/2015.
- Employee at Ameritas Investment Corp. from 02/2014 to 12/2015.
- Employee at Millennium Financial Group (a DBA) from 12/2013 to present.
- Registered Representative with L.M. Kohn & Company from 5/2017 to present.
- Investment Advisory Representative with L.M. Kohn & Company from 10/2015 to present.

**FINRA Series 7 & 66 Exams.**

**Disciplinary Information:**

None

**Other Business Activities:**

Alexander Ferguson, an associated person of LMK that determines general client advice, engages in insurance sales and service is an associated person of Millennium Financial (MFG). Clients of LMK may be referred to (MFG) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

**(#MO032 continued)**

**GERALD GIESE, born 1952**

**EDUCATION:**

Graduated with a BBA from North Texas State in 1975.

**EMPLOYMENT:**

- Financial Advisor at Shearson Lehman Hutton Inc. from 5/1989 – 2/1990
- Financial Advisor at Citigroup Global Markets Inc. from 3/1990 – 5/2003
- Financial Advisor at The Advisor Group Inc from 5/2003 – 10/2003
- Financial Advisor at Acacia Life Insurance from 10/2003 – 12/2011
- Financial Advisor at Union Central Life Insurance from 6/2006 to 12/2011
- Financial Advisor at Ameritas Life Insurance Corp. from 10/2003 to 11/2015
- Financial Advisor at Ameritas Investment Corp. from 10/2003 to 11/2015
- Registered Representative with L.M. Kohn & Company from 11/2015 to present.
- Investment Advisory Representative with L.M. Kohn & Company from 11/2015 to present.

**FINRA Series 3,7,63 & 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Gerald Giese, an associated person of LMK that determines general client advice, engages in insurance sales and service is an associated person of Millennium Financial Group (MFG). Clients of LMK may be referred to (MFG) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

**(#MO032 continued)**

**CHARLES SAENGER, born 1974**

**EDUCATION:**

Graduated with a BS in Business Administration Finance from University of Dayton in 1996.

**EMPLOYMENT:**

- Financial Advisor at Birchtree Financial Services from 4/2000 to 03/2001
- Financial Advisor at The Advisors Group Inc from 3/2001 to 10/2003
- Financial Advisor at Acacia Life Insurance from 10/2003 to 12/2011
- Financial Advisor at Union Central Life Insurance from 6/2006 to 12/2011
- Financial Advisor at Ameritas Life Insurance Corp. from 10/2003 to 12/2015
- Financial Advisor at Ameritas Investment Corp. from 10/2003 to 12/2015
- Financial Advisor at Ameritas Life Insurance Corp of New York from 3/2006 to 12/2015
- Financial Advisor at Millennium Financial Group (a DBA) from 12/1999 to present
- Registered Representative with L.M. Kohn & Company from 12/2015 to present.
- Investment Advisory Representative with L.M. Kohn & Company from 12/2015 to present.

**FINRA Series 7, 24, 63 & 66 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Charles Saenger, an associated person of LMK that determines general client advice, engages in insurance sales and service is an associated person of Millennium Financial Group (MFG). Clients of LMK may be referred to (MFG) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.



#OH031 .....17601 W. 130<sup>th</sup> Street  
.....North Royalton, OH 44133  
.....Doing Business As: M3 Wealth Management / Healy Financial

**MARTIN S. HEALY, born 1976**

**Education:**

- Graduated from Cleveland State University in 2000

**Employment:**

- Employee of PrimeSolutions Securities, Inc. from 1/2004 to 10/2015.
- Employee of City of Brook Park from 8/2003 to Present.
- Registered Representative with L.M. Kohn & Company from 10/2015 to Present
- Investment Advisory Representative with L.M. Kohn & Company from 10/2015 to Present

**FINRA Series 7& 66 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Martin Healy, an associated person of LMK that determines general client advice, is owner of Healy Financial Services. (HFS) which is a company that sells securities and insurance in addition to the investment advisory services offered. M3 Wealth Management is the OSJ branch for HFS. Clients of LMK may be referred to (HFS) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Martin S. Healy, an associated person of LMK, provides general client advice and services, and is a trustee for the Berea City Schools Educational Foundation.

Martin S. Healy, an associated person of LMK, provides general client advice and services, and is an employee of the City of Brook Park.

#OH031 .....17601 W 130th Street  
.....North Royalton, OH 44133  
..... Doing Business As: M3 Wealth Management / King Financial Inc.

**MICHAEL DONNELLAN, born 1968**

**EDUCATION:**

Graduated from Westlake High School 1986

**EMPLOYMENT:**

- Financial Advisor at Olde Discount Corporation from 07/1991 to 04/1997
- Financial Advisor at Next Advisors, Inc. from 05/1997 to 01/2001
- Financial Advisor at PrimeSolutions Securities, Inc. from 01/2001 to 10/2015
- Registered Representative with L.M. Kohn & Company from 10/2015 to Present.
- Investment Advisory Representative with L.M. Kohn & Company from 10/2015 to Present.

**FINRA Series 4,7,8,24,63 & 65 Exams.**

**Disciplinary Information:**

- 4/9/1997 – 9/21/1998: Alleged failure to follow instructions, unauthorized trading, misrepresentation, unsuitability, excessive trading and breach of fiduciary duty – settled for \$40,000 & discharged.
- 11/7/2007: Credit card debt with Weltman Weinberg & Reis due to divorce settlement – paid and settled.
- 11/7/2007: Credit card debt with Compromise with Hudson & Keyes due to divorce – paid and settled.
- 3/31/2009: Credit card debt with Compromise with Midland Funding due to divorce – paid and settled.

**Other Business Activities:**

Michael Donnellan, an associated person of LMK that determines general client advice and services, is the President of King Financial Inc. (KFI). M3 Wealth Management is the OSJ branch for KFI. Clients of LMK may be referred to (KFI) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

#OH031 .....17601 W. 130<sup>th</sup> Street  
.....North Royalton, OH 44133  
.....Doing Business As: M3 Wealth Management / Pinzone Financial Services

**MARK PINZONE, born 1970**

**Education:**

- Graduated with J.D. from Cleveland Marshall School of Law (Cleveland State University) in 1999.
- Graduated with a Post Bachelors degree from the University of Akron in 1997.
- Graduated with an undergrad Bachelors degree from Ohio University in 1992.

**Employment:**

- Teacher at Brunswick High School from 9/1995 to present.
- Financial Advisor at Primesolutions Securities, Inc. from 1/2001 to 10/2015.
- Registered Representative with L.M. Kohn & Company from 10/2015 to Present
- Investment Advisory Representative with L.M. Kohn & Company from 10/2015 to Present

**FINRA Series 6,7,63 & 65 Exams.**

**Disciplinary Information: None**

**Other Business Activities:**

Mark Pinzone, an associated person of LMK that determines general client advice, engages in insurance sales and services, is the owner of Pinzone Financial Services (PFS). M3 Wealth Management is the OSJ branch for PFS. Clients of LMK may be referred to (PFS) and vice versa. However, no referral fees of any kind will be paid by either party for said referrals.

Mark Pinzone, an associated person of LMK that determines general client advice, is a teacher at Brunswick City Schools.

Mark Pinzone, an associated person of LMK that determines general client advice, is a football coach at Brunswick City Schools.