

# **Key Wealth Advisors LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: November 24, 2021**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Key Wealth Advisors LLC (“Key Wealth” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (256) 715-9190 or via email at [info@key-wealthadvisors.com](mailto:info@key-wealthadvisors.com).

Key Wealth is a registered investment advisor with U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Key Wealth to assist you in determining whether to retain the Advisor.

Additional information about Key Wealth and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 317106.

**Key Wealth Advisors LLC**  
**100 Wall Street, Suite 502, New York, NY 10005**  
**Phone: (256) 715-9190 | <https://key-wealthadvisors.com>**

## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Key Wealth. For convenience, the Advisor has combined these documents into a single disclosure document.

Key Wealth believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Key Wealth encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

This is the initial filing of this Disclosure Brochure.

### Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 317106. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (256) 715-9190 or via email at [info@key-wealthadvisors.com](mailto:info@key-wealthadvisors.com).

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## Item 4 – Advisory Services

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### A. Firm Information

Key Wealth Advisors LLC (“Key Wealth” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of the State of Delaware. Key Wealth was founded in October 2021 and is a wholly-owned subsidiary of Key Wealth Management LLC. The Principal Officers of Key Wealth are Ahmad R. Karim (Chief Executive Officer and Chief Compliance Officer), Ross S. Yehia Hubbard (Chief Operating Officer) and David A. Elfenbein (President - Wealth Management).

This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Key Wealth.

### B. Advisory Services Offered

Key Wealth offers advisory services to individuals, high net worth individuals, families, trusts, estates, businesses, and retirement plans (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness, and good faith towards each Client and seeks to mitigate conflicts of interest. Key Wealth’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Investment Management Services

Key Wealth provides customized investment management solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. Key Wealth works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to design a portfolio strategy. Key Wealth will then construct an investment portfolio, consisting of exchange-traded funds (“ETFs”), individual equity securities, individual fixed income securities, mutual funds and/or private investments, as appropriate for the Client. The Advisor may also utilize other types of investments, as appropriate, to meet the needs of the Client. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Key Wealth Advisors’ investment strategies are primarily long-term focused, but the Advisor may buy, sell, or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Key Wealth Advisors will construct, implement, and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Key Wealth Advisors evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Key Wealth Advisors may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Key Wealth Advisors may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Key Wealth Advisors may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

*Use of Independent Managers* – Key Wealth may recommend that Clients utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) for all or a portion of a Client’s investment portfolio, based on the Client’s needs and objectives. In certain instances, the Client may be required to authorize and enter into an investment advisory agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide its services. The Advisor will perform initial and ongoing oversight and due diligence over each Independent Manager to ensure the strategy remains aligned

with Clients investment objectives and overall best interests. The Advisor will also assist the Client in the development of the initial policy recommendations and managing the ongoing Client relationship. The Client, prior to entering into an agreement with an Independent Manager, will be provided with the Independent Manager's Form ADV Part 2A - Disclosure Brochure (or a brochure that makes the appropriate disclosures).

#### Financial Planning Services

Key Wealth will typically provide a variety of financial planning and consulting services to Clients. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, insurance needs, and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. Key Wealth may also refer Clients to an accountant, attorney, or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For project-based or ad-hoc engagements, the Advisor may not provide a written summary. Project-based financial plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

#### Retirement Plan Advisory Services

Key Wealth provides non-discretionary retirement plan advisory services on behalf of the retirement plans (each a "Plan") and the company (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Plan Participant Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Design and Monitoring
- Investment monitoring and oversight
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance

These services are provided by Key Wealth serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of Key Wealth's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

#### **C. Client Account Management**

Prior to engaging Key Wealth to provide advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority, and responsibilities of the Advisor and the Client.

These services may include:

- Establishing an Investment Strategy – Key Wealth, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – Key Wealth will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation, and tolerance for risk for each Client or unique client goal.
- Portfolio Construction – Key Wealth will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Key Wealth will provide investment management and ongoing oversight of the Client's investment portfolio.

#### **D. Wrap Fee Programs**

Key Wealth does not manage or place Client assets into a wrap fee program.

#### **E. Assets Under Management**

As of December 31, 2020 Key Wealth manages \$176,071,230 in Client assets, all of which are managed on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

### **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more written agreements with the Advisor.

#### **A. Fees for Advisory Services**

##### Investment Management Services

Investment advisory fees are paid quarterly, advance of each calendar quarter pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. Investment advisory fees range from 0.50% to 1.50% annually based on several factors, including: the scope and complexity of the services to be provided; the level of assets to be managed; and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. In certain circumstances, the Advisor may charge a fixed annual rate or fixed fee for its services. The Client's fees will take into consideration the aggregate assets under management with the Advisor across all accounts, unless otherwise agreed in writing. All securities held in accounts managed by Key Wealth will be independently valued by the Custodian. Key Wealth will not have the authority or responsibility to value portfolio securities.

The Advisor's fee is exclusive of and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees and costs.

Clients may make additions to and withdrawals from their account[s] at any time, subject to Key Wealth' right to terminate an account. Additions may be in cash or securities provided that Key Wealth reserves the right to liquidate any transferred securities or decline to accept particular securities into a Client's account[s]. Clients may withdraw account assets on notice to Key Wealth, subject to the usual and customary securities settlement procedures. However, Key Wealth designs its portfolios as long-term investments, and the withdrawal of assets may impair the achievement of a Client's investment objectives. Key Wealth may consult with its Clients about the options and ramifications of transferring securities. However, Clients are advised that when transferred securities

are liquidated, they may be subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

#### Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its investment advisory fee as described above. Independent Managers typically do not offer any fee discounts but may have a breakpoint schedule which will reduce the fee with an increased level of assets placed under management with an Independent Manager. The Advisor will allocate a portion of the advisory fee collected to the Independent Manager pursuant to the terms of the executed agreement between the Advisor and the Independent Manager. If the Client is required to authorize and enter into an investment advisory agreement with an Independent Manager then the terms of such fee arrangements are included in the Independent Manager's disclosure brochure and applicable contract[s] with the Independent Manager.

#### Financial Planning Services

Key Wealth Advisors offers financial planning services either on an hourly basis or a fixed engagement fee. Hourly fees range up to \$500 per hour. Fixed fee engagements are based on the expected number of hours to complete the scope at the Advisor's hourly rate. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total hours and/or total costs will be provided to the Client prior to engaging for these services.

#### Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee ranging from 0.25% to 1.00% based on the size of the Plan and scope of services to be provided. Fees are typically billed in advance of each calendar quarter, pursuant to the terms of the retirement plan advisory agreement. Retirement plan fees are based on the market value of assets under management in the Plan at the end of the prior calendar quarter. Fees may be negotiable depending on the size and complexity of the Plan. \

### **B. Fee Billing**

#### Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] in advance of each calendar quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the market value of assets under management as of the end of the prior calendar quarter. Clients will be provided with a statement, generally monthly, from the Custodian reflecting the deduction of the investment management fee. Clients provide written authorization permitting advisory fees to be deducted by Key Wealth to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

For Client accounts implemented through an Independent Manager, the Client's overall fees may include Key Wealth's investment advisory fee (as noted above) plus investment advisory fees and/or platform fees charged by the Independent Manager[s], as applicable. In certain instances, the Independent Manager or the Advisor may assume responsibility for calculating the Client's fees and deduct all fees from the Client's account[s]. In other instances the Advisor and the Independent Manager will each assume the responsibility for calculating and deducting their respective fees from the Client's account[s].

#### Financial Planning Services

Financial planning fees for project-based engagements may be invoiced up to 50 percent (50%) of the expected total fee upon execution of the financial planning agreement. For ongoing financial planning engagements, fees are invoiced quarterly at the beginning of each quarter.

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#### Retirement Plan Advisory Services

Retirement plan advisory fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

#### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties other than Key Wealth, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all securities execution and custody fees charged by the Custodian, if applicable. The Advisor's recommended Custodian often does not charge securities transaction fees for ETF and equity trades in a Client's account[s], provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian may charge for certain mutual funds and other types of investments. The fees charged by Key Wealth are separate and distinct from these custody and execution fees.

In addition, all fees paid to Key Wealth for investment management services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Key Wealth but would not receive the services provided by Key Wealth which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Key Wealth to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information. Additionally, as noted above, the Advisor will select share classes that do not have trading costs when possible. These will in most cases be institutional share classes but in some cases may be share classes with higher internal expense ratios than institutional share classes. Please refer to Item 12 – Brokerage Practices for additional information.

#### **D. Advance Payment of Fees and Termination**

##### Investment Management Services

Key Wealth is compensated for its investment management services in advance of the quarter in which services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination, and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid fees from the effective date of termination through the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

##### Use of Independent Managers

In the event that the Advisor has determined that an Independent Manager is no longer in the Client's best interest or a Client should wish to terminate their relationship with the Independent Manager, the terms for the termination will be set forth in the respective agreements between the Client or the Advisor and the Independent Manager. Key Wealth will assist the Client with the termination and transition as appropriate.

##### Financial Planning Services

Key Wealth may be compensated for its financial planning services in advance. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate or in the case of a fixed fee engagement, the percentage of the engagement scope completed by the Advisor. Upon termination, the Advisor will refund any unearned, prepaid planning fees. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

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#### Retirement Plan Advisory Services

Key Wealth is compensated for its services at the beginning of the quarter before advisory services are rendered. Either party may request to terminate a retirement plan advisory agreement, at any time, by providing advance written notice to the other party. The Client shall be responsible for advisory fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid advisory fees from the effective date of termination to the end of the quarter. The Client's retirement plan advisory agreement with the Advisor is non-transferable without the Client's prior consent.

#### **E. Compensation for Sales of Securities**

Key Wealth does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the wealth management fees noted above.

Certain Advisory Persons are also a Registered Representatives of Velocity Clearing LLC ("Velocity Clearing"), a registered broker-dealer (CRD# 126588) and member FINRA, SIPC. In one's separate capacity as a Registered Representative of Velocity Clearing, the Advisory Person will implement securities transactions under Velocity Clearing and not through Key Wealth Advisors. In such instances, the Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities. Compensation earned by the Advisory Person in one's capacity as a Registered Representative is separate and in addition to the Advisor's fees. This practice presents a conflict of interest as the Advisory Person may have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. Clients are not obligated to implement any recommendation provided by the Advisor nor Advisory Persons. Neither the Advisor nor Advisory Persons will earn ongoing investment advisory fees in connection with any products or services implemented in the Advisory Person's separate capacity as a Registered Representative. Please see Item 10 below.

Certain Advisory Persons are also licensed as independent insurance professionals. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by Advisory Persons are separate and in addition to advisory fees. This practice presents a conflict of interest because person's providing investment advice on behalf of the Advisor who are insurance agents have an incentive to recommend insurance products to Clients for the purpose of generating commissions, rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through any Advisory Person affiliated with the Advisor. Please see Item 10 – Other Financial Industry Activities and Affiliations.

#### **Item 6 – Performance-Based Fees and Side-By-Side Management**

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Key Wealth does not charge performance-based fees for its wealth management services. The fees charged by Key Wealth are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

Key Wealth does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

#### **Item 7 – Types of Clients**

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Key Wealth offers advisory services to individuals, high net worth individuals, families, trusts, estates, and businesses. Key Wealth generally does not impose a minimum relationship size.

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

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##### **A. Methods of Analysis**

Key Wealth primarily employs fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from Key Wealth are derived from numerous sources, including financial

media companies, third-party research materials, professional data subscriptions, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. This criteria generally consists of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

*Technical analysis* involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that Key Wealth will be able to predict such a reoccurrence accurately.

As noted above, Key Wealth generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Key Wealth will typically hold all or a portion of a security for more than a year but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Key Wealth may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector, or asset class.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Key Wealth will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. Please see Item 8.B. for risks associated with the Advisor's investment strategies as well as general risks of investing.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

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

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

### Bond ETF Risks

Bond ETFs are subject to specific risks, including the following: (1) interest rate risks, i.e., the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bonds time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e., the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investors rate of return, (4) credit default risk, i.e., the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e., the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e., the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily; therefore, a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

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**There are no legal, regulatory, or disciplinary events involving Key Wealth or its management persons.**

Key Wealth values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 317106.

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

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Except as noted below, Key Wealth does not maintain any affiliations with other firms, other than contracted service providers to assist with the servicing of its Client's accounts.

### Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Independent Managers. The Advisor does not receive any compensation nor does this present a material conflict of interest. The Advisor will only earn its investment advisory fee as described in Item 5.A.

### Broker-Dealer Affiliation

As noted in Item 5, certain Advisory Persons are also Registered Representatives of Velocity Capital. In one's separate capacity as a Registered Representative, an Advisory Person will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by an Advisory Person. Neither the Advisor nor its Advisory Persons will earn ongoing

investment advisory fees in connection with any services implemented in an Advisor Person's separate capacity as a Registered Representative.

#### Insurance Agency Affiliations

As noted in Item 5, certain Advisory Persons are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one's role with Key Wealth. As an insurance professional, the Advisory Person will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Advisory Persons or the Advisor.

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

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#### **A. Code of Ethics**

Key Wealth has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with Key Wealth ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. Key Wealth and its Supervised Persons owe a duty of loyalty, fairness, and good faith towards each Client. It is the obligation of Key Wealth' Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (256) 715-9190 or via email at [info@key-wealthadvisors.com](mailto:info@key-wealthadvisors.com).

#### **B. Personal Trading with Material Interest**

Key Wealth allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Key Wealth does not act as a principal in any transactions. In addition, the Advisor does not act as the general partner of a fund or advise an investment company. Key Wealth does not have a material interest in any securities traded in Client accounts.

#### **C. Personal Trading in Same Securities as Clients**

Key Wealth allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Key Wealth requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

#### **D. Personal Trading at Same Time as Client**

While Key Wealth allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no time will Key Wealth, or any Supervised Person of Key Wealth, transact in any security to the detriment of any Client.**

## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

Key Wealth does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Key Wealth to direct trades to the Custodian as agreed upon in the wealth management agreement. Further, Key Wealth does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where Key Wealth does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by Key Wealth. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Key Wealth may recommend the Custodian based on criteria such as, but not limited to, the reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices. As certain Advisory Persons of Key Wealth Advisors are Registered Representatives of Velocity Clearing, the Advisor may be limited in using broker-dealers/custodians as Velocity Clearing must approve the use of any outside broker-dealer/custodian. Key Wealth will generally recommend that Clients establish their account[s] at Fidelity Clearing and Custody Solutions and related divisions and entities of Fidelity Investments, Inc., including National Financial Services LLC, and Fidelity Brokerage Services LLC (collectively "Fidelity"), a FINRA-registered broker-dealer and member SIPC. Fidelity will serve as the Client's "qualified custodian." Key Wealth maintains an institutional relationship with Fidelity, whereby the Advisor receives economic benefits from Fidelity.

Key Wealth has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. Access to the Fidelity platform is provided at no charge to the Advisor. The Fidelity platform includes brokerage, custody, administrative support, record keeping, technology and related services designed to support registered investment advisors like Key Wealth in serving Clients. These services are intended to serve the best interests of the Advisor's Clients.

Fidelity may charge brokerage commissions (securities transaction fees) for effecting certain securities transactions. Fidelity enables the Advisor to obtain certain no-load mutual funds without securities transaction fees and other no-load funds at nominal transaction charges. Fidelity's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Fidelity may be higher or lower than those charged by other custodians and broker-dealers. Please see Item 14 below for additional information.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Key Wealth does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

**2. Brokerage Referrals** - Key Wealth does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis," where Key Wealth will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Key Wealth will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.



A Client may pay a commission that is higher than another qualified custodian might charge to effect the same transaction. The Advisor has determined in good faith that the commissions charged by Fidelity are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not necessarily the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the Custodian's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although the Advisor will seek competitive rates, to the benefit of all Clients, it may not necessarily obtain the lowest possible commission rates for specific Client account transactions. Although the investment research products and services that may be obtained by the Advisor will generally be used to service all of the Advisor's Clients, they may not equally benefit all Clients. Please also see Item 14.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Key Wealth will execute its transactions through the Custodian as authorized by the Client. Key Wealth may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons of Key Wealth and periodically by the CCO. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Key Wealth if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic, or political events.

### **C. Review Reports**

The Client will receive brokerage statements generally monthly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions, and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

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### **A. Compensation Received by Key Wealth**

Key Wealth is a fee-based advisory firm that is compensated solely by its Clients and not from any investment product. Key Wealth does not receive commissions or other compensation from product sponsors, broker-dealers or any unrelated third party. Key Wealth may refer Clients to various unaffiliated, non-advisory professionals (e.g., attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Key Wealth may receive non-compensated referrals of new Clients from various third-parties.

#### Participation in Institutional Advisor Platform

As noted in item 12, Key Wealth has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s].

As part of the arrangement, Fidelity also makes available to the Advisor, at no additional charge to the Advisor, certain research and brokerage services, including research services obtained by Fidelity directly from independent research companies. The Advisor may also receive additional services and support from Fidelity. As a result of receiving such services for no additional cost, the Advisor may have an incentive to continue to use or expand the use of Fidelity's services. The Advisor examined this potential conflict of interest when it chose to enter into the relationship with Fidelity and has determined that the relationship is in the best interests of the Advisor's Clients and satisfies its Client obligations, including its duty to seek best execution. Please see Item 12 above.

The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services. In addition, Fidelity has provided the Advisor with financial support in the launch of the Advisor and reimbursements for various third-party service providers.

#### **B. Client Referrals from Solicitors**

Key Wealth does not engage paid solicitors for Client referrals.

#### **Item 15 – Custody**

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All Clients must place their assets with a “qualified custodian.” Clients are required to engage the Custodian to retain their funds and securities and direct Key Wealth to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by Key Wealth to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may also have custody of those assets. In order to avoid additional regulatory requirements, the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

#### **Item 16 – Investment Discretion**

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Key Wealth generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Key Wealth. The discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Key Wealth will be in accordance with each Client's investment objectives and goals.

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

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Key Wealth does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies. However, the Client retains the sole responsibility for proxy decisions and voting.



## Item 18 – Financial Information

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Neither Key Wealth, nor its management, have any adverse financial situations that would reasonably impair the ability of Key Wealth to meet all obligations to its Clients. Neither Key Wealth, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Key Wealth is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**Ahmad (Razi) Karim  
Chief Executive Officer and Chief Compliance Officer**

**Effective: November 24, 2021**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Ahmad (Razi) Karim (CRD# 4574768) in addition to the information contained in the Key Wealth Advisors LLC (“Key Wealth Advisors” or the “Advisor”, CRD# 317106) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Key Wealth Advisors Disclosure Brochure or this Brochure Supplement, please contact us at (256) 715-9190 or via email at [info@key-wealthadvisors.com](mailto:info@key-wealthadvisors.com).

Additional information about Mr. Karim is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4574768.

## Item 2 – Educational Background and Business Experience

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Ahmad (Razi) Karim, born in 1969, is dedicated to advising Clients of Key Wealth Advisors as its Chief Executive Officer and Chief Compliance Officer. Mr. Karim earned an MBA from Georgetown University in 1996 and a B.S. from Cornell University in 1992. Additional information regarding Mr. Karim's employment history is included below.

### Recent Employment History:

Chief Executive Officer and Chief Compliance Officer, Key Wealth Advisors LLC	10/2021 to Present
Registered Representative, Velocity Clearing, LLC	10/2021 to Present
Managing Member, The Karim Group LLC	07/2009 to 08/2021
Registered Representative, TOR Brokerage LLC	02/2021 to 08/2021
Registered Representative, TOR Brokerage LLC	04/2017 to 12/2019

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Karim.*** Mr. Karim has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Karim. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Karim.*** However, we do encourage you to independently view the background of Mr. Karim on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4574768.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Karim is also a Registered Representative of Velocity Clearing LLC ("Velocity Clearing"), a registered broker-dealer (CRD# 126588), member FINRA, SIPC. In Mr. Karim's separate capacity as a Registered Representative, Mr. Karim will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Karim. Neither the Advisor nor Mr. Karim will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Karim's separate capacity as a Registered Representative. Mr. Karim spends less than 20% of his time per month in his role as a Registered Representative of Velocity Clearing

## Item 5 – Additional Compensation

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Mr. Karim has additional business activities where compensation is received that are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Karim serves as the Chief Executive Officer and Chief Compliance Officer of Key Wealth Advisors. Mr. Karim can be reached at (256) 715-9190.

Key Wealth Advisors has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Key Wealth Advisors. Further, Key Wealth Advisors is subject to regulatory oversight by various agencies. These agencies require registration by Key Wealth Advisors and its Supervised Persons. As a registered entity, Key Wealth Advisors is subject to examinations by regulators, which may be announced or unannounced. Key Wealth Advisors is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**Ross S. Yehia Hubbard  
Chief Operating Officer**

**Effective: November 24, 2021**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Ross S. Yehia Hubbard (CRD# 6891978) in addition to the information contained in the Key Wealth Advisors LLC (“Key Wealth Advisors” or the “Advisor”, CRD# 317106) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Key Wealth Advisors Disclosure Brochure or this Brochure Supplement, please contact us at (256) 715-9190 or via email at [info@key-wealthadvisors.com](mailto:info@key-wealthadvisors.com).

Additional information about Mr. Yehia Hubbard is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6891978.

## Item 2 – Educational Background and Business Experience

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Ross S. Yehia Hubbard, born in 1981, is dedicated to advising Clients of Key Wealth Advisors as its Chief Operating Officer. Mr. Yehia Hubbard earned an LLB Law & European Studies from University of Surrey in 2003. Additional information regarding Mr. Yehia Hubbard's employment history is included below.

### Employment History:

Chief Operating Officer, Key Wealth Advisors LLC	10/2021 to Present
Partner, Karim Group LLC	01/2018 to 08/2021
Head of Business Development, TBCC Commodities LLC	01/2014 to 03/2020
Partner, Contiro Ltd	10/2006 to 09/2014

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Yehia Hubbard.*** Mr. Yehia Hubbard has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Yehia Hubbard. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Yehia Hubbard.*** However, we do encourage you to independently view the background of Mr. Yehia Hubbard on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6891978.

## Item 4 – Other Business Activities

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Mr. Yehia Hubbard is dedicated to the investment advisory activities of Key Wealth Advisors' Clients. Mr. Yehia Hubbard does not have any other business activities.

## Item 5 – Additional Compensation

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Mr. Yehia Hubbard is dedicated to the investment advisory activities of Key Wealth Advisors' Clients. Mr. Yehia Hubbard does not receive any additional forms of compensation.

## Item 6 – Supervision

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Mr. Yehia Hubbard serves as the Chief Operating Officer of Key Wealth Advisors and is supervised by Mr. Karim (Chief Executive Officer and Chief Compliance Officer). Mr. Karim can be reached at (256) 715-9190.

Key Wealth Advisors has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Key Wealth Advisors. Further, Key Wealth Advisors is subject to regulatory oversight by various agencies. These agencies require registration by Key Wealth Advisors and its Supervised Persons. As a registered entity, Key Wealth Advisors is subject to examinations by regulators, which may be announced or unannounced. Key Wealth Advisors is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**David A. Elfenbein  
President - Wealth Management**

**Effective: November 24, 2021**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of David A. Elfenbein (CRD# 2765089) in addition to the information contained in the Key Wealth Advisors LLC (“Key Wealth Advisors” or the “Advisor”, CRD# 317106) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Key Wealth Advisors Disclosure Brochure or this Brochure Supplement, please contact us at (256) 715-9190 or by email at [info@key-wealthadvisors.com](mailto:info@key-wealthadvisors.com).

Additional information about Mr. Elfenbein is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2765089.

## Item 2 – Educational Background and Business Experience

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David A. Elfenbein, born in 1974, is dedicated to advising Clients of Key Wealth Advisors as the President - Wealth Management. Mr. Elfenbein earned a Bachelor of Science in Business Administration from University of Vermont in 1997. Additional information regarding Mr. Elfenbein's employment history is included below.

### Employment History:

President - Wealth Management, Key Wealth Advisors LLC	11/2021 to Present
Registered Representative, Velocity Clearing LLC	11/2021 to Present
Senior Vice President - Investments, Wells Fargo Clearing Services LLC	04/2012 to 11/2021
Vice President, UBS Financial Services, Inc.	11/2004 to 04/2012

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Elfenbein.*** Mr. Elfenbein has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Elfenbein.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Elfenbein.***

However, we do encourage you to independently view the background of Mr. Elfenbein on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2765089.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Elfenbein is also a registered representative of Velocity Clearing LLC ("Velocity Clearing"). Velocity Clearing is a registered broker-dealer (CRD# 126588), member FINRA, SIPC. In Mr. Elfenbein's separate capacity as a registered representative, Mr. Elfenbein will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Elfenbein. Neither the Advisor nor Mr. Elfenbein will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Elfenbein's separate capacity as a registered representative. Mr. Elfenbein spends approximately 10% of his time per month in his role as a registered representative of Velocity Clearing.

### Insurance Agency Affiliations

Mr. Elfenbein is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Elfenbein's role with Key Wealth Advisors. As an insurance professional, Mr. Elfenbein will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Elfenbein is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Elfenbein or the Advisor. Mr. Elfenbein spends approximately 10% of his time per month in this capacity.

## Item 5 – Additional Compensation

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Mr. Elfenbein has additional business activities where compensation is received that are detailed in Item 4 above.



## **Item 6 – Supervision**

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Mr. Elfenbein serves as the President - Wealth Management of Key Wealth Advisors and is supervised by Ahmad Karim, the Chief Compliance Officer. Mr. Karim can be reached at (256) 715-9190.

Key Wealth Advisors has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Key Wealth Advisors. Further, Key Wealth Advisors is subject to regulatory oversight by various agencies. These agencies require registration by Key Wealth Advisors and its Supervised Persons. As a registered entity, Key Wealth Advisors is subject to examinations by regulators, which may be announced or unannounced. Key Wealth Advisors is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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**Key Wealth Advisors LLC**

100 Wall Street, Suite 502, New York, NY 10005  
Phone: (256) 715-9190 | <https://key-wealthadvisors.com>

# **Form ADV Part 2B – Brochure Supplement**

**for**

**Eva M. Drew  
Vice President, Planning and Operations**

**Effective: November 24, 2021**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Eva M. Drew (CRD# 6309000) in addition to the information contained in the Key Wealth Advisors LLC (“Key Wealth Advisors” or the “Advisor”, CRD# 317106) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Key Wealth Advisors Disclosure Brochure or this Brochure Supplement, please contact us at (256) 715-9190 or by email at [info@key-wealthadvisors.com](mailto:info@key-wealthadvisors.com).

Additional information about Ms. Drew is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 6309000.

## Item 2 – Educational Background and Business Experience

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Eva M. Drew, born in 1983, is dedicated to advising Clients of Key Wealth Advisors as a Vice President, Planning and Operations. Ms. Drew earned a B.S. in Communications from University of Florida in 2005. Additional information regarding Ms. Drew's employment history is included below.

### Employment History:

Vice President, Planning and Operations, Key Wealth Advisors LLC	11/2021 to Present
Registered Representative, Velocity Clearing LLC	11/2021 to Present
Owner, Horizon West Plumbing	07/2021 to Present
Financial Advisor, Wells Fargo Advisors	02/2014 to 07/2021
Senior Communications Specialist, John Wiley & Sons, Inc.	03/2006 to 10/2013

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Ms. Drew.*** Ms. Drew has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Drew.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Drew.***

However, we do encourage you to independently view the background of Ms. Drew on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 6309000.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Ms. Drew is also a registered representative of Velocity Clearing LLC ("Velocity Clearing"). Velocity Clearing is a registered broker-dealer (CRD# 126588), member FINRA, SIPC. In Ms. Drew's separate capacity as a registered representative, Ms. Drew will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Ms. Drew. Neither the Advisor nor Ms. Drew will earn ongoing investment advisory fees in connection with any products or services implemented in Ms. Drew's separate capacity as a registered representative. Ms. Drew spends approximately 10% of her time per month in his role as a registered representative of Velocity Clearing.

### Other Business

Ms. Drew is also the owner of Horizon West Plumbing. Less than 20% of her time is devoted to this business activity.

## Item 5 – Additional Compensation

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Ms. Drew has additional business activities where compensation is received that are detailed in Item 4 above.

## Item 6 – Supervision

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Ms. Drew serves as a Vice President of Planning and Operations of Key Wealth Advisors and is supervised by Ahmad Karim, the Chief Compliance Officer. Mr. Karim can be reached at (256) 715-9190.

Key Wealth Advisors has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Key Wealth Advisors. Further, Key Wealth

Advisors is subject to regulatory oversight by various agencies. These agencies require registration by Key Wealth Advisors and its Supervised Persons. As a registered entity, Key Wealth Advisors is subject to examinations by regulators, which may be announced or unannounced. Key Wealth Advisors is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

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Effective: November 24, 2021

### Our Commitment to You

Key Wealth Advisors LLC ("Key Wealth" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Key Wealth (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Key Wealth does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural, and electronic security measures. These include such safeguards as secure passwords, encrypted file storage, and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. Key Wealth Advisors shares Client information with Velocity Clearing LLC ("Velocity Clearing") This sharing is due to the oversight Velocity Clearing has over certain Supervised Persons of the Advisor. You may also contact us at any time for a copy of the Velocity Clearing Privacy Policy.	Yes	No
<b>Marketing Purposes</b> Key Wealth does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Key Wealth or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> Key Wealth does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (256) 715-9190 or via email at [info@key-wealthadvisors.com](mailto:info@key-wealthadvisors.com).