

# **Form ADV Part 2A Brochure**

## **Providence Financial Advisors, LLC**

6900 College Blvd., Suite 440

Overland Park, KS 66211

**[www.pfa-llc.com](http://www.pfa-llc.com)**

913-323-0535

February 25, 2021

This Brochure provides information about the qualifications and business practices of Providence Financial Advisors, LLC (PFA). If you have any questions about the contents of this Brochure, please contact us at 913-323-0535. 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.

PFA is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information from which you determine to hire or retain an Adviser.

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

## Item 2 – Material Changes

This Brochure, dated February 25, 2021, represents the annual amendment to the previously published Providence Financial Advisors, LLC Brochure.

Since the filing of the firm’s last annual update Brochure on March 2, 2020, subsequently amended September 4, 2020, and October 26, 2020, we have added detail about a referral arrangement the firm now has. We have also made various other minor updates but no other material changes were made to our Brochure.

Pursuant to regulatory requirement, we will deliver to you a summary of any material changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. All such information will be provided to you free of charge.

Currently, our Brochure may be requested by contacting us at (913) 323-0535.

Additional information about PFA 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 PFA who are registered as investment adviser representatives of PFA.

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#### **Item 4 – Advisory Business**

Providence Financial Advisors, LLC (CRD # 124839) (PFA) is registered as an investment adviser in the states of Kansas and Missouri. PFA is based in Kansas and is organized as a limited liability company under the laws of the State of Kansas and the United States of America. The firm has been in business since 2003 and currently has 2 employees.

PFA's mailing address and main office location is 6900 College Blvd., Suite 440, Overland Park, KS 66211. Regular business hours are from 8:30am to 5:00pm Monday through Friday and by appointment only. The firm can be contacted by phone at (913) 323-0535 and by fax at (866) 711-3213.

Steven T. Cox, CFA, founded the firm and currently serves as President and Chief Compliance Officer. He is also the Chairman of the Investment Committee.

Mark J. Donaldson, CFA, and Steven T. Cox, Jr. are also members of the Investment Committee.

PFA provides individualized portfolio management, investment advisory/consulting and financial planning services to individuals, trusts and estates, and businesses. PFA also provides assistance and advice to businesses related to their defined contribution plans.

The firm's primary service is ongoing portfolio management. When providing these services, the firm not only makes recommendations related to investments, but also implements these recommendations and provides ongoing monitoring and reporting. Clients may elect to give the firm discretion to make all decisions (discretionary management), or may prefer to approve all decisions before implementation (non discretionary management).

The firm also provides ongoing investment advisory/consulting services. When providing these non-management services, the firm makes investment recommendations but the client is responsible for determining whether or not to implement recommendations. The client is also responsible for actual implementation.

Although some financial planning is provided as a courtesy to ongoing clients, the firm also offers separate financial planning services. These services are available generally on a project basis, but can also be structure as an ongoing engagement. In a financial planning engagement, the firm provides advice or other strategic assistance in areas such as education funding, retirement planning, estate planning, risk management, employee benefits planning, tax planning, etc. In financial planning engagements, clients are

responsible for determining whether or not to implement a recommendation, and if they decide to do so, are responsible for actual implementation.

In addition these services that are provided to individuals, the firm also provides retirement plan services to businesses where the firm provides plan level services such as discretionary management services, non-discretionary management services, and investment advisory services related to different types of retirement plans. When providing management services, the firm is responsible for implementing recommendations. When the firm is providing advisory services, the client is responsible for implementation of recommendations.

Regardless of the services provided, each is tailored to the individual needs of a particular client (whether an individual, a family, or a business) through an assessment conducted prior to an engagement. Clients may impose restrictions related to the level of discretion granted, the types of investments used, etc. Terms of an actual engagement, including description of service, limitations and restrictions, fees, etc., are all detailed before any engagement begins in a written client agreement.

As of 11/30/2020, PFA managed approximately \$101,314,047 of assets, of which approximately \$83,480,887 was managed on a discretionary basis and approximately \$17,833,160 was managed on a nondiscretionary basis. PFA also provided ongoing advisory services on approximately \$46,674,629 of additional assets.

## **Item 5 – Fees and Compensation**

### Ongoing Portfolio Management/Advisory Fees

Fees are calculated based on the asset level at the end of each month or quarter, depending on contract terms. The standard fee schedule for services is as follows:

<u>Assets</u>	<u>Annual Fee</u>
Less than \$50,000	2.00%
\$50,001 - \$500,000	1.50%
\$500,001 - \$1,999,999	1.00%
\$2,000,000 - \$4,999,999	0.80%
Over \$5,000,000	negotiable

Fees are negotiable based on the actual level of service provided, and family accounts are aggregated for fee purposes. For account charged in advanced, client may terminate with 30 days written notice and unearned fees will be refunded on a pro rata basis. Fees are generally due quarterly in arrears and deducted from the account, although clients may elect to receive direct billing.

In addition to the fees charged by us, the client may also pay mutual funds' internal management and distribution fees as detailed in each fund's prospectus. Any transaction fees levied by a broker or custodian executing a trade on behalf of a client will also be paid by the client.

#### Project Oriented Financial Planning/General Consulting

Fees for project oriented engagements are generally charged at a rate of \$150 per hour, but will be agreed upon in advance. The fees are payable upon completion of the project or according to the schedule agreed upon prior to commencement of the project.

#### Retirement Plan Services

Fees for defined contribution plan services provided to businesses are generally quoted based on assets advised or are quoted on a fixed fee basis. The fees are negotiable based on the size and type of the relationship. Fees are generally payable quarterly in arrears.

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

PFA does not charge performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client), and consequently does not simultaneously manage performance based and non performance based accounts.

### **Item 7 – Types of Clients**

As noted in Item 4, PFA provides its services to individuals, trusts and estates, businesses and defined contribution plans.

We do not typically require a minimum dollar value of assets; however we reserve the right to decline or accept any prospective account.

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

PFA's general investment strategy, consistent with the tenets of modern portfolio theory, is to attempt to reduce risk and volatility by building globally diversified portfolios.

To implement this strategy, PFA primarily use fundamental security analysis. While mutual funds and exchange traded funds are the primary investment vehicles used in client accounts, we may also use various other investment vehicles in the implementation of our strategies, including long-term purchases (securities held at least a year), short-term purchases (securities sold within a year), trading (securities sold with 30 days), margin and options.

Investing in securities involves risk of loss that clients should be prepared to bear. Such risks include market risk, interest rate risk, currency risk, and political risk, among others. Certain trading strategies can affect investment performance through increased brokerage and other transactions. Each client's propensity for risk however is thoroughly evaluated, documented, and considered throughout the portfolio implementation process.

No investment strategy can assure a profit or avoid a loss.

## **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of the firm or the integrity of its management. PFA is currently not subject to, nor has ever been subject to, any legal or disciplinary events of a material nature.

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

PFA has solicitor arrangements with Prairie Capital Management LLC whereby PFA is compensated for referring clients. Clients are not however required to retain Prairie Capital Management LLC. Please see Item 14 in this brochure for additional information on this arrangement.

PFA has no other financial industry activities and has no other financial industry affiliations.

## **Item 11 - Code of Ethics**

As a state registered investment advisor, PFA is not required to maintain a separate code of ethics. However, the firm does have policies related to personal trading. For example, the firm or its associated individuals may buy or sell securities for their personal accounts which may be identical to or different than those recommended to clients. They may not though favor their own interest over that of a client nor make personal investment decisions based on the investment decisions of advisory clients.

## **Item 12 - Brokerage Practices**

### **The Custodian and Brokers We Use**

PFA does not maintain possession of client assets. Instead, we require all client assets be maintained in an account at a non affiliated “qualified custodian,” generally a broker-dealer or bank. We currently recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as a qualified custodian. We are not affiliated with Schwab but instead are independently owned and operated. Schwab will hold your assets in a brokerage account and will buy and/or sell securities upon your instructions.

While we recommend that you use Schwab as custodian/broker, you will ultimately decide whether to do so. You will open your account with Schwab or another custodian/broker by entering into an account agreement directly with them. We do not actually open accounts for you, although we can assist you in doing so. We will assist you in opening an account at whatever custodian/broker you decide to use.

### **How We Select Custodians and Brokers**

When recommending a custodian or broker for our clients, we consider many different factors including quality of service, types of services offered, overall capability, execution quality, competitiveness of transaction costs, availability of investment research, reputation, financial resources, and stability, among other things. In determining the reasonableness of a broker’s compensation, we consider the overall cost to you relative to the benefits you receive, both directly and indirectly, from the broker.

## **Your Brokerage and Custody Costs**

Our clients receive various services directly from Schwab, our custodian. For our clients' accounts that Schwab maintains, Schwab generally does not charge separately for custody services but instead is compensated by charging commissions or other fees on trades that it executes or trades that are executed by other brokers to and from Schwab accounts. Fees applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a certain level of assets at Schwab. We feel that this commitment benefits you because the overall rates you pay may be lower than they might be otherwise.

Since Schwab charges you a fee for each trade that we have executed by a different broker-dealer, we have Schwab execute most trades for your account in order to minimize your trading costs.

We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means seeking the most favorable terms for a transaction based on all relevant factors, including those listed above.

## **Products and Services Available to Us From Brokers/Custodians**

Our primary custodian provides us and our clients with access to its institutional brokerage services like trading, custody, reporting, and related services, many of which are not typically available to Schwab retail customers. Schwab also makes available various support services, some of which may help us manage or administer our clients' accounts, while others may help us manage and grow our business.

Schwab's institutional brokerage services which benefit you directly include access to a broad range of investment products, execution of securities transactions, and asset custody. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that provide access to client account data, facilitates trade execution for multiple client

accounts, provides pricing and other market data, facilitates payment of our fees from our clients' accounts, and assists with back-office functions, recordkeeping, and client reporting.

Schwab also offers other services intended to help us manage and further develop our business. These services include educational conferences and events, consulting on technology, compliance, legal, and business needs, publications and conferences on practice management and business succession, and access to employee benefits providers, human capital consultants, and insurance providers.

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. Of course, this may give us an incentive to recommend that you maintain your account with Schwab based on our interests rather than yours, which is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients, and is primarily supported by the scope, quality, and price of Schwab's services and not Schwab's services that benefit only us.

Although PFA receives some benefits as mentioned above, PFA does not engage in or participate in formal soft dollar arrangements where the firm is required to direct a specific volume of client brokerage trades to broker/dealers in exchange for specific soft dollar credits.

## **Item 13 – Review of Accounts**

### **Reviews of Accounts**

Client accounts are supervised by one or both principals of the firm. Although accounts are generally assigned to one principal, some accounts may be reviewed jointly. In addition to ongoing supervision, accounts are generally reviewed more formally on a quarterly basis. The quarterly review generally includes assessing client goals and objectives, evaluating the employed strategy, monitoring the portfolio, and addressing the need to rebalance. One or both of the principals will periodically, and at least annually, review client's investment policy and risk profile, and discuss the re-balancing of each client's accounts to the extent appropriate.

Additional account reviews may be triggered by a specific client request, by a change in client goals or objectives, by an imbalance in a portfolio asset allocation, or by market or economic conditions.

All ongoing clients are advised that it remains their responsibility to advise of any changes in their investment objectives and/or financial situation.

### **Regular Reports Provided to Clients**

Clients are provided with account statements from their custodian on at least a quarterly basis which list account holdings and transactions for the period. Clients may also be provided by PFA with written performance reports (usually on a quarterly basis) that detail current market value, performance relative to market benchmarks, and overall portfolio allocation.

We urge our clients to carefully review custodial statements when received and to compare them to reports received from us.

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

PFA may pay outside individuals or other professional entities to refer clients to us from time to time. Such arrangements are structured to be in compliance with applicable securities laws. For example, where applicable a client is provided a disclosure statement prior to or at the time of entering into any advisory contract which describe the specific compensation arrangement. The advisory fee charged to clients does not increase as a result of such referral arrangements.

PFA also has a solicitor agreement with Prairie Capital Management LLC., another federally registered advisor (Advisor), whereby PFA is compensated by the Advisor for the referral of clients. The fee paid to PFA is based on a percentage of the fee charged to the client by the Advisor. The arrangement is fully disclosed to the client at the time of the engagement with Advisor, and the specific referral fee is detailed in the client's agreement with the Advisor. PFA charges no other fees to the client for this relationship.

PFA receives economic benefits from our custodians in the form of the support products and services that are made available to us and to other independent investment advisors. These products and services, how they benefit us, and the related conflicts of interest are

described in Item 12 above. The availability to us of our custodian's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

### **Item 15 – Custody**

As mentioned in Item 12 above, we do not hold client assets but instead require that they be held by a third party “qualified custodian.” We may, however have limited control in some instances to trade on your behalf, to deduct our advisory fees from your account with your authorization, or to request disbursements on your behalf (although various types of written authorizations are required depending on the type of disbursements).

You will receive account statements directly from your custodian at least quarterly, which will be sent to the email or postal mailing address you provide. We urge you to carefully review these custodial statements when you receive them and to compare them to reports you receive from us.

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

PFA will accept discretionary authority to manage securities accounts on behalf of clients, although we will also accept non discretionary accounts.

When granted authority to manage accounts, we customarily have the authority to determine which securities and the amounts that are bought or sold. Any discretionary authority accepted by us however is subject to the client's risk profile and investment objectives, and may be limited by any other limitations provided by the client in writing.

PFA will not exercise any discretionary authority until it has been given authority to do so in writing. Such authority is granted in the written agreement between PFA and the client, and in the written agreement with the third party custodian.

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

PFA does not vote proxies for clients but will, upon request, discuss with the client any questions regarding proxy matters to assist the client in making an informed decision in voting proxies themselves.

## **Item 18 – Financial Information**

Registered investment advisers are required in some cases to provide certain financial information and or disclosures about their financial condition. For example, if the firm requires prepayment of fees for six months in advance, has custody of client funds, or has a condition that is reasonably likely to impair its ability to meet its contractual commitments to its clients, it must provide financial information and make certain disclosures.

PFA has no financial or operating conditions which trigger such additional reporting requirements.

## **Item 19 – Requirements for State-Registered Advisers**

All state required education, employment, and business activity information can be found in Item 4 above and Part 2B of Form ADV below.

State registered firms are also required to make additional disclosures if a) the firm is compensated for advisory services with performance based fees, b) the firm or any of its management persons has been involved in certain types of arbitration, civil, or administrative claims, or c) the firm or any of its management persons has a relationship or arrangement with any issuer of securities.

Neither the firm nor any of its management persons has any such arrangements, nor has been involved in any such actions, which require additional disclosures.

Kansas registered firms are also required to disclose whether the firm carries professional liability insurance coverage for its investment advisory services. The firm does carry professional liability insurance coverage and will provide any client or prospective Kansas client proof of coverage upon request to the Chief Compliance Officer.

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

**Steven T. Cox, CFA**

Providence Financial Advisors, LLC

6900 College Blvd., Suite 440

Overland Park, KS 66211

913-323-0535

February 25, 2021

This Brochure Supplement provides information about Steven T. Cox that supplements the Providence Financial Advisors (PFA) Brochure which you should have received. Please contact us at (913) 323-0535 if you did not receive the PFA Brochure or if you have any questions about it or the contents of this supplement.

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

## **Item 2- Educational Background and Business Experience**

Steven T. Cox, born in 1960, founded PFA in 2003 and currently serves as the President and Chief Compliance Officer of the firm. He is also the firm's Investment Committee Chairman.

Since 2003, Mr. Cox has provided investment management services and financial counseling to individuals and small businesses. Prior to 2003, Mr. Cox worked at INVESCO, Inc., (and predecessor companies) as a Marketing Director, Consultant Team and a Client Relationship Manager.

Mr. Cox earned a CFA charter in 1998. The Chartered Financial Analyst (CFA) charter is a globally accepted, graduate-level investment credential established in 1962 and awarded by CFA Institute, the largest global association of investment professionals. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as a member; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct. The CFA Program curriculum covers a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

Mr. Cox received a B.A. in Business Administration & Religious Studies from Southwest Baptist University in 1982, and had taken MBA courses in Finance at the University of Missouri-Kansas City during 1986-1987.

## **Item 3- Disciplinary Information**

As noted in Item 9 on Part 2B of the investment adviser brochure, Mr. Cox is currently not subject to, nor has ever been subject to, any legal or disciplinary events of a material nature.

**Item 4- Other Business Activities**

Mr. Cox has no other financial industry affiliations.

**Item 5- Additional Compensation**

Mr. Cox does not receive any economic benefits, sales awards, or other compensation in connection with providing advisory services to clients.

**Item 6 - Supervision**

Mr. Cox is President of the firm and consequently does not report to a supervisor.

**Item 7- Requirements for State-Registered Advisers**

State registered investment adviser representatives are required to disclose all material facts regarding certain legal, disciplinary or financial events that would be material to the evaluation of the representative. Mr. Cox is currently not subject to, nor has ever been subject to, any legal, disciplinary or financial events of this nature.

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

**Mark J. Donaldson, CFA**

**Providence Financial Advisors, LLC**

6900 College Blvd., Suite 440

Overland Park, KS 66211

913-323-0535

February 25, 2021

This Brochure Supplement provides information about Mark J. Donaldson that supplements the Providence Financial Advisors (PFA) Brochure which you should have received. Please contact us at (913) 323-0535 if you did not receive the PFA Brochure or if you have any questions about it or the contents of this supplement.

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

## **Item 2- Educational Background and Business Experience**

Mark J. Donaldson, born in 1962, currently serves as Managing Director of the firm. Prior to joining PFA in 2008, Mr. Donaldson held the position of Chief Compliance Officer and served on the Executive Committee of a national dually registered broker dealer and investment advisory firm with over 400 registered personnel. His primary responsibility was providing oversight related to the supervisory structure of the organization.

Prior to that, he held various positions over a period of 16 years at a national investment consulting firm. While working at the consulting firm, he was also responsible for trading, operations, finance, and regulatory compliance for that firm's discretionary investment management affiliate and the firm's institutional brokerage subsidiary.

Mr. Donaldson earned a CFA charter in 2001. The Chartered Financial Analyst (CFA) charter is a globally accepted, graduate-level investment credential established in 1962 and awarded by CFA Institute, the largest global association of investment professionals. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as a member; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct. The CFA Program curriculum covers a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

Mr. Donaldson received a BSBA in Accounting from Rockhurst University in 1985.

## **Item 3- Disciplinary Information**

As noted in Item 9 on Part 2B of the investment adviser brochure, Mr. Donaldson is currently not subject to, nor has ever been subject to, any legal or disciplinary events of a material nature.

#### **Item 4- Other Business Activities**

Mr. Donaldson also owns and operates a consulting firm providing operational and regulatory compliance advice and support to other registered investment advisory firms.

#### **Item 5- Additional Compensation**

Mr. Donaldson does not receive any economic benefits, sales awards, or other compensation in connection with providing advisory services to clients.

#### **Item 6 - Supervision**

Mr. Donaldson is Managing Director of the firm and consequently does not report directly to a supervisor.

#### **Item 7- Requirements for State-Registered Advisers**

State registered investment adviser representatives are required to disclose all material facts regarding certain legal, disciplinary or financial events that would be material to the evaluation of the representative. Mr. Donaldson is currently not subject to, nor has ever been subject to, any legal, disciplinary or financial events of this nature.

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

**Steven T. Cox, Jr., CFA**

**Providence Financial Advisors, LLC**

6900 College Blvd., Suite 440

Overland Park, KS 66211

**913-323-0535**

**February 25, 2021**

This Brochure Supplement provides information about Steven T. Cox, Jr. that supplements the Providence Financial Advisors (PFA) Brochure which you should have received. Please contact us at (913) 323-0535 if you did not receive the PFA Brochure or if you have any questions about it or the contents of this supplement.

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

## **Item 2- Educational Background and Business Experience**

Steven T. Cox, Jr., born in 1990, joined the firm in 2019 as an Investment Advisor Representative. Prior to that, he was a Reporting Associate for Prairie Capital from 2011 to 2020 and a student intern at UMB Bank in 2011.

Mr. Cox received a Bachelor of Science Degree in Economics and Finance from Southwest Baptist University in 2011, and a Masters of Business Administration in Finance from Rockhurst University in 2014.

Mr. Cox earned a CFA charter in 2021. The Chartered Financial Analyst (CFA) charter is a globally accepted, graduate-level investment credential established in 1962 and awarded by CFA Institute, the largest global association of investment professionals. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as a member; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct. The CFA Program curriculum covers a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

## **Item 3- Disciplinary Information**

Steven T. Cox, Jr. is currently not subject to, nor has ever been subject to, any legal or disciplinary events of a material nature.

## **Item 4- Other Business Activities**

Steven T. Cox, Jr. has no other financial industry affiliations.

## **Item 5- Additional Compensation**

Steven T. Cox, Jr. does not receive any economic benefits, sales awards, or other compensation in connection with providing advisory services to clients.

## **Item 6 - Supervision**

Steven T. Cox Jr. reports to Steven T. Cox, Sr., the President and Chief Compliance Officer of the firm. He can be reached at the number listed above.

## **Item 7- Requirements for State-Registered Advisers**

State registered investment adviser representatives are required to disclose all material facts regarding certain legal, disciplinary or financial events that would be material to the evaluation of the representative. Steven T. Cox, Jr. is currently not subject to, nor has ever been subject to, any legal, disciplinary or financial events of this nature.