

# DISCLOSURE BROCHURE

THE INVESTMENT ADVISERS ACT OF 1940 RULE 203-1

**Part 2A of Form ADV: Firm Brochure**



**Firm IARD/CRD #: 144031**

Investment Management Services Group, LLC

REGISTERED INVESTMENT ADVISOR

This Disclosure Brochure provides information about the qualifications and business practices of Investment Management Services Group, LLC, which should be considered before becoming a client. You are welcome to contact us if you have any questions about the contents of this brochure - our contact information is listed to the right. Additional information about Investment Management Services Group, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

The information contained in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Administrator. Furthermore, the term "registered investment advisor" is not intended to imply that Investment Management Services Group, LLC has attained a certain level of skill or training.

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BROCHURE  
DATED

**1  
JANUARY  
2020**

## MATERIAL CHANGES

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ITEM 2

There are no material changes to report. This Disclosure Brochure has been reviewed and is current as of the date indicated on the cover.

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**BROCHURE SUPPLEMENTS**

## ADVISORY BUSINESS

### Who We Are

Investment Management Services Group, LLC (hereinafter referred to as “IMS”, “the Company”, “we”, “us” and “our”) is a registered investment advisor<sup>1</sup> formed in January of 2008 as a Florida Limited Liability Company. IMS offers portfolio management services<sup>2</sup> designed to assist you, our client<sup>3</sup>, achieve success with your financial goals.

#### Owners

The following person controls the Company:

| Name            | Title                                      | CRD#    |
|-----------------|--|---------|
| Julie M. Decker | Managing Member & Chief Compliance Officer | 1859609 |

#### Assets Under Management

As of January 1, 2020, our assets under management totaled:

Client Discretionary Managed Accounts ..... \$14,359,038

We do not offer non-discretionary investment management services.

### Our Mission

Our mission is to assist you in managing your investment portfolio with three goals in mind: 1) Safety, 2) Maximize Income, and 3) Growth. Our strategy is designed to protect your wealth, maintain your investment expectations and minimize the risk relative to your financial goals.

### What We Do

**We manage wealth.** Our portfolio management services begin with stressing the importance of making fiscally responsible decisions and disciplined economic choices in your personal life so we can effectively help you achieve your monetary goals for today’s needs, tomorrow’s dreams, and a future legacy.

Focus of our portfolio management will be to identify your unique investment parameters that once defined, will allow us to provide clear perspective and insight into the investment alternatives to be most effective for your situation. These identifying parameters are a beginning point to successful portfolio management that includes:

<sup>1</sup> The term “registered investment advisor” is not intended to imply that Investment Management Services Group, LLC has attained a certain level of skill or training. It is used strictly to reference the fact that we are “registered” as a licensed “investment advisor” with the Florida Office of Financial Regulation - and with such other State Regulatory Agencies that may have limited regulatory jurisdiction over our business practices.  
<sup>2</sup> Investment Management Services Group, LLC is a fiduciary, as defined within the meaning of the Employer Retirement Income Security Act of 1974 (“ERISA”) and/or as defined under the Internal Revenue Code of 1986 (the “Code”) for any portfolio management services provided to a client who is: (i) a plan participant or beneficiary of a retirement plan subject to ERISA or as described under the Code; or, (ii) the beneficial owner of an Individual Retirement Account (“IRA”).  
<sup>3</sup> A client could be an individual and their family members, a family office, a foundation or endowment, a corporation and/or small business, a trust, a guardianship, an estate, a retirement plan, or any other type of entity to which we choose to give investment advice.

- ❖ **Risk Assessment** - An attempt to identify your level of tolerable risk to an acceptable level of market volatility and expected investment return.
- ❖ **Investment Composition** - An investment strategy designed to achieve your unique financial expectations relative to your risk factors and predetermined benchmarks.
- ❖ **Tax Management** - Income producing investments, if at or nearing retirement or are risk averse, designed to protect assets and capitalize on investment returns that yield either a low tax base income or are tax exempt.

From these identifying factors we will construct managed portfolios consisting primarily of equity (“stock”) positions. You can find more information about our management fees and services under “Portfolio Management” in Item 5, “Fees & Compensation” and further description of our management style under Item 8, “Methods of Analysis, Investment Strategies & Risk of Loss”.

## How We Get to Know You

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As a new client, we will conduct pre-advisory consultations with you to discuss issues such as your current income and expenses, career, personal goals, investment return expectations and prior investment experience. In addition, we will have you complete a profile questionnaire<sup>4</sup> to gain greater insight into your financial needs.

With the complexity of today’s marketplace, it is critical for us to understand who you are and what you want to accomplish financially. We must have a clear picture of your unique financial composition and risk tolerance so that we can develop a successful portfolio management strategy. Our meetings with you to discuss your finances will help to eliminate much of the guesswork in achieving the security and independence you desire and simplify your financial alternatives. In return, we will have:

- ❖ Defined and narrowed objectives and investment options;
- ❖ Identified areas of greatest distress;
- ❖ Developed a strategy for addressing concerns about the future;
- ❖ Cultivated peace of mind; and,
- ❖ Created a unique picture of your overall economic personality.

Once your financial parameters have been identified, we will prepare a recommendation that outlines which investment portfolio is most suitable for your investment expectations and risk tolerance. This investment portfolio will guide us in the management of your account(s), and as a standard against which to measure future results and to make modifications where necessary.

## FEES & COMPENSATION

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ITEM 5

### Portfolio Management

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Portfolio management is provided on an asset-based fee arrangement. Management fees are calculated based on the aggregate market value of your account on the last business day of the

<sup>4</sup> The profile questionnaire we use is an important tool in gathering information about your investment methodology, risk tolerance, income/tax bracket, liquidity, time horizons, etc. If you elect not to answer the questionnaire or chooses to respond with limited input, it is possible that we could operate in a handicapped capacity contrary to your investment needs. Therefore, if you desire the most effective and accurate recommendations regarding your managed account(s), you should make every effort to provide us with your detailed personal needs and objectives, along with detailed financial and tax information.

previous calendar quarter multiplied by one-fourth of the corresponding annual percentage rate (i.e.,  $1.25\% \div 4 = 0.3125\%$ ).

We retain discretion to negotiate the management fee within each tier on a client-by-client basis depending on the size and complexity of the portfolio managed. In addition, a fee break will occur as assets in your portfolio increase past the following tier:

| Account Value               | Annual Fee Rate<br>Not to Exceed |
|-----------------------------|----------------------------------|
| Up to \$49,999 .....        | 1.50%                            |
| \$50,000 to \$999,999 ..... | 1.25%                            |
| Over \$1,000,000 .....      | 1.00%                            |

We have **no minimum requirements** for you to open a Portfolio Management account. The portfolio management fee will be fully disclosed to you in an Investment Advisory Agreement prior to conducting any investment management services.

### Protocols for Portfolio Management

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The following protocols establish how we handle our portfolio management accounts and what you should expect when it comes to: (i) managing your account; (ii) your bill for investment services; (iii) deposits and withdrawals; and, (iv) other fees charged to your account(s).

#### Discretion

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We will establish discretionary trading authority on all management accounts to execute securities transactions at anytime without your prior consent or advice.

At anytime however, you may impose restrictions, **in writing**, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, exclude the ability to purchase securities with an inverse relationship to the market, limit our use of leverage, etc.)

#### Billing

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Your account will be billed quarterly **in advance** based on the above fee arrangements. Contributions to your account greater than \$25,000 made during the calendar quarter may be prorated (See “**Deposits & Withdrawals**” below for more information.). For **new managed accounts** opened in mid-quarter, our fee will be based on a pro-rated calculation of your assets to be managed for remainder of the existing quarter.

Advisory fees will be deducted first from any money market funds or cash balances. If such assets are insufficient to satisfy payment of such fees, a portion of the account assets will be liquidated to cover the fees.

#### Withdrawals

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For assets you may withdraw, we **do not make partial refunds** of our management fees. Withdrawing assets from your account may require modifications and adjustments to be made in the account to correct the allocation of assets in your portfolio.

## Fee Exclusions

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The above fees for all of our management services are exclusive of any charges imposed by the custodial firm including, but not limited to: (i) any Exchange/SEC fees; (ii) certain transfer taxes; (iii) service or account charges, including, postage/handling fees, electronic fund and wire transfer fees, auction fees, debit balances, margin interest, certain odd-lot differentials and mutual fund short-term redemption fees; and (iv) brokerage and execution costs associated with securities held in your managed account. There can also be other fees charged to your account that are unaffiliated with our management services.

In addition, all fees paid to us for portfolio management services are separate from any fees and expenses charged on mutual fund shares by the investment company or by the investment advisor managing the mutual fund portfolios. These expenses generally include management fees and various fund expense, such as: redemption fees, account fees, and purchase fees may occur but are the exception within managed accounts at institutional custodians. A complete explanation of these expenses charged by the mutual funds is contained in each mutual fund's prospectus. You are encouraged to carefully read the fund prospectus.

## Termination of Portfolio Management Services

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To terminate our investment advisory services, either party (you or us) by written notification to the other party, may terminate the Investment Advisory Agreement at any time, provided such written notification is received at **least 30 days prior** to the date of termination (i.e.; To terminate services on October 1<sup>st</sup>, a request for termination should be received in our office by September 1<sup>st</sup>.). Such notification should include the date the termination will go into affect along with any final instructions on the account (i.e., liquidate the account, finalize all transactions and/or cease all investment activity).

In the event termination does not fall on the last day of a calendar quarter, you shall be entitled to a pro-rated refund of the prepaid quarterly management fee based upon the number of days remaining in the quarter after the termination notice goes into affect. Once the termination of investment advisory services has been implemented, neither party has any obligation to the other - we no longer earn management fees or give investment advice and you become responsible for making your own investment decisions.

## PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGEMENT

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ITEM 6

We do not charge fees based on a share of capital gains or the capital appreciation of the assets held in your accounts.

## TYPES OF CLIENTS

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ITEM 7

The types of clients we offer advisory services to are described above under "Who We Are" in the Item 4, the "Advisory Business" section. Our minimum account size and/or minimum fee for portfolio management is disclosed above under "Portfolio Management" in Item 5 above in the, "Fees & Compensation" section of this Brochure.

## METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS

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Our portfolio management services combine your financial needs and investment objectives, time horizon, and risk tolerance to yield an effective investment strategy. The portfolio is then tailored to these investment parameters using primarily equity (“stock”) positions.

In addition, depending on your risk tolerance, we may also recommend using the following investment vehicles to achieve your desired investment objective, which will include, but not be limited to: closed-end funds, exchange traded funds (“ETFs”), real estate investment trusts (“REITs”), Mortgage REITs, Preferred Shares, Mast Limited Partnerships, Royalty Trusts, municipal bonds, and no-load mutual funds.

### Methods of Analysis

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In analyzing securities for inclusion in a portfolio, we will use a combination of analysis techniques to gathering information and to guide us in our management decisions.

#### Fundamental Analysis

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Fundamental analysis considers: economic conditions, earnings, cash flow, book value projections, industry outlook, politics (as it relates to investments), historical data, price-earnings ratios, dividends, general level of interest rates, company management, debt ratios and tax benefits.

#### Technical Analysis

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Technical analysis utilizes current and historical pricing information to help us identify trends in the broader domestic and foreign equity and fixed income markets, and in the underlying assets themselves. This may involve the use of various technical indicators, such as moving averages and trend-lines, among others.

#### Cyclical Analysis

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Market cycles provide historic tried and true timing mechanisms to indicate turning points in future market prices. By tracking historic data through charts and graphs we can improve entry and exit strategies.

Fundamental analysis provides us with a broad long-term view of a security that begins with determining a company’s value and the strength of its financials while technical analysis is short-term focusing on the statistics generated by market activity. Cyclical analysis provides us with historical data on market trends to focus our technical analysis for ideal entry/exit points.

### Investment Strategies

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We are not bound to a specific investment strategy or ideology for the management of your investment portfolio. Through a combination of the above techniques, we develop our unique portfolios for Income, Muni-Income, and Growth/Income that we use for all client portfolios. Our goal is to create the safest portfolios, maximizing the income while minimizing the risk, so as to not sacrifice long term income goals.

## Asset Allocation

**Asset allocation is a foundation of our investment strategy.** Asset allocation is a broad term used to define the process of selecting a mix of asset classes or sectors and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance of risk.

Investment positions in portfolios are usually diversified into several sectors of the market in order to minimize sector and industry risk. A typical Income Portfolio may hold 10 to 30 positions in individual stocks and/or the other investment vehicles identified previously. Municipal Bonds may be utilized in taxable accounts if they provided a higher tax-advantaged yield.

## Investment Methodology

The investment methodology of our portfolios uses income strategies designed to match our portfolios to your current and future income needs. We periodically review our Income Portfolios for the key factors that determine market performance, yield, risk, and sector weighting. As, to further minimize and protect against market loss, we incorporate stop-loss protection on your positions.

Stop losses are placed on all positions. We use a rolling stop loss that moves with the value of the position. It is typically set at 25% below the current price. From time to time this stop loss may be tightened to account for current market conditions. Assuming we have a portfolio of 25 to 30 positions with a 25% stop loss on each position, we are minimizing the loss of any one position in the portfolio to no more than 1% of the total portfolio.

## Managing Risk

The biggest risk to you is the risk that the value of your investment portfolio will decrease due to moves in the market. This risk is referred to as the market risk factor, which is made up of four primary risks:

- ❖ **Interest Rate Risk** - Interest rate risk affects the value of bonds more than stocks. Essentially, when the interest rate on a bond begins to rise, the value (bond price) begins to drop; and vice versa, when interest rates on a bond fall, the bond value rises.
- ❖ **Equity Risk** - Equity risk is the risk that the value of your stocks will depreciate due to stock market dynamics causing one to lose money.
- ❖ **Currency Risk** - Currency risk is the risk that arises from the change in price of one currency against that of another. Investment values in internationally securities can be affected by changes in exchange rates.
- ❖ **Commodity Risk** - Commodity risk refers to the uncertainties of future market values and the size of future income caused by the fluctuation in the prices of commodities (i.e., grains, metals, food, electricity, etc...).

The risk factors we have cited here are not intended to be an exhaustive list, but are the most common risks your portfolio will encounter. Other risks that we haven't defined could be political, over-concentration, and liquidity to name a few. However notwithstanding these risk factors, the most important thing for you to understand is that regardless of how we analyze securities or the investment strategy and methodology we use to guide us in the management of your investment portfolio, **investing in a security involves a risk of loss that you should be willing and prepared to bear; and furthermore, past market performance is no guarantee that you will see equal or better future returns on your investment.**

**DISCIPLINARY INFORMATION**

ITEM 9

We are required to disclose disciplinary events that may be material for your evaluation of our advisory practices; therefore, pursuant to Item 9.B. of the Form ADV Part 2A: Firm Brochure, question 9.B.2.(d) asks that we disclose:

“An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which your firm or a management person was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority imposing a civil money penalty of more than \$2,500 on your firm or a management person.”

**2016 Stipulation and Consent Agreement** - Through the course of conducting a routine on-site examination, the Florida Office of Financial Regulation (“OFR”), alleged Investment Management Services Group, LLC and Thomas W. Markosky violated Florida rules and regulations by: (i) not maintaining an accurate Form ADV Part 2B: Brochure Supplement for Mr. Markosky, which improperly identifying him as having a CERTIFIED FINANCIAL PLANNER™ (CFP®) designation; (ii) not maintaining written policies and procedures to supervise two (2) branch offices; and, (iii) allowing professional designations be posted on the Company’s website for management persons who had not earned the designations.

So as to not incur any further legal costs and the inconvenience defending the Company against the allegations made by OFR in their Administrative Complaint, Ms. Julie M. Decker consented to the findings by OFR, **without admitting or denying the allegations**, and settled with an administrative fine of \$6,000. The fine has been paid pursuant to the terms of the Stipulation and Consent Agreement finalized in October 2016. No further action has been taken by OFR and the Company is operating in good standing.

**2016 Settlement Stipulation for Consent Order** - Through the course of a routine investigation, the Florida Department of Financial Services (“Department”) found Ms. Julie M. Decker authorized an employee of IMS Partners, Inc., under her direct supervision and control, to telephone insurers while impersonating insured in an effort to learn about the insurer’s investments. In addition, the Department alleged Ms. Decker sold annuities that replaced other annuities without truthfully disclosing those exchanges and the funding sources for the purchased annuities.

So as to not incur any further legal costs and the inconvenience defending herself against the allegations made by the Department in their Administrative Complaint, Ms. Julie M. Decker consented to the findings by the Department and settled with an administrative fine for \$7,500 and agreed to probation for two-(2) years. The fine has been paid pursuant to the terms of the Settlement Stipulation for Consent Order finalized in April of 2016 and the probation period completed. No further action has been taken by the Department against Ms. Decker.

**OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS**

ITEM 10

**Insurance Activities & Agency Affiliation**

Through our affiliated company IMS Partners, Inc., a Florida Resident Insurance Agency, certain of our management persons are licensed as resident life, health, and annuity insurance agents

by the State of Florida and may also be licensed as non-resident agents in other states to sell insurance-related products and earn commissions from the sale of these products.

Ms. Julie M. Decker serves as the President and CEO of IMS Partners, Inc. and is also the Managing Member of this advisory firm, Investment Management Services Group, LLC. As an officer of IMS Partners, Inc., Ms. Decker provides operational oversight, performs managerial duties, and provides additional services as the General Agent for the agency. Her responsibility to these managerial activities may range from 50 to 75 percent her time.

Referrals between IMS Partners, Inc. and Investment Management Services Group, LLC can create a potential conflict of interest to our fiduciary duty to be impartial with our advice and to keep your interests ahead of our own. As the primary control person of both entities, Ms. Decker is able to influence you to use either of these entities for your investment and/or insurance needs. If you accept her recommendation, this can lead to increased personal revenues in the form of advisory/consulting fees and salary. Therefore, before accepting recommendations to engage an either of these affiliated companies, you should consider other options to ensure that the service is comparable or equivalent to the service you might receive from another independent firm.

For further information on the potential conflicts and economic benefits from these and other activities, see Item 14, “**Client Referrals & Other Compensation**” of this Brochure. In addition, more information about our management persons who offer investment advice and their insurance activities can be found in their individual “**Brochure Supplements.**”

## **CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS & PERSONAL TRADING**

ITEM 14

### **Code of Ethics**

As a fiduciary, the Company has an affirmative duty to render continuous, unbiased investment advice, and at all times act in your best interest. To maintain this ethical responsibility, we have adopted a Code of Ethics that establishes the fundamental principles of conduct and professionalism expected by all personnel in discharging their duties. This Code is a value-laden guide committing such persons to uphold the highest ethical standards, rooted in the most elementary maxim. Our Code of Ethics is designed to deter inappropriate behavior and heighten awareness as to what is right, fair, just and good by promoting:

- ❖ Honest and ethical conduct.
- ❖ Full, fair and accurate disclosure.
- ❖ Compliance with applicable rules and regulations.
- ❖ Reporting of any violation of the Code.
- ❖ Accountability.

To help you understand our ethical culture and standards, how we control sensitive information and what steps have been taken to prevent personnel from abusing their inside position, a copy of our Code of Ethics is available for review upon request.

### **Client Transactions**

We have a fiduciary duty to ensure that your welfare is not subordinated to any interests of ours or any of our personnel. The following disclosures are internal guidelines we have adopted to assist us in protecting all of our clientele.

## Participation or Interest

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It is against our policies for any owners, officers, directors and employees to invest with you or with a group of clients, or to advise you or a group of clients to invest in a private business interest or other non-marketable investment unless prior approval has been granted by Ms. Julie M. Decker and such investment is not in violation of any SEC and/or State rules and regulations.

## Class Action Policy

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The Company, as a general policy, does not elect to participate in class action lawsuits on your behalf. Rather, such decisions shall remain with you or with an entity you designate. We may assist you in determining whether you should pursue a particular class action lawsuit by assisting with the development of an applicable cost-benefit analysis, for example. However, the final determination of whether to participate, and the completion and tracking of any such related documentation, shall generally rest with you.

## Personal Trading

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Employees of ours are permitted to personally invest their own monies in securities, which may also be, from time to time, recommended to you. Most of the time, such investment purchases are independent of, and not connected in any way to, the investment decisions made on your behalf. However, there may be instances where investment purchases for you may also be made in an employee's account. In these situations, we have implemented the following guidelines in order to ensure our fiduciary integrity:

1. No employee acting as an Investment Advisor Representative (RA), or who has discretion over your account, shall buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment, unless the information is also available to the investing public on reasonable inquiry. No employee of ours shall prefer his or her own interest to that of yours or any other advisory client.
2. We maintain a list of all securities holdings for all our access employees. Ms. Decker reviews these holdings on a regular basis.
3. We require that all employees act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
4. Bunched orders (See "Trading Allocation" above) may include employee accounts. In such cases, priority and advantage will be given to satisfy your order first regardless of the situation.
5. Any individual not in observance of the above may be subject to termination.

Personal trading activities are monitored by Ms. Decker to ensure that such activities do not impact upon your security or create conflicts of interest.

## BROKERAGE PRACTICES

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ITEM 12

### Custodial Services

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IMS has custodial arrangements with Shareholder Service Group, Inc. ("SSG"), an FINRA licensed broker-dealer (member FIRNA/SIPC), through its Institutional services to investment advisors. SSG offers us services which include custody of securities, trade execution, clearance and settlement of transactions.

Our recommendation for you to custody your assets with SSG has no direct correlation to the services we receive from SSG and the investment advice we offer you, although we do receive economic benefits through our relationship with SSG that are typically not available to SSG retail clients. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a dedicated trading desk; access to batch trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to accounts); the ability to have advisory fees deducted directly from accounts; access to an electronic communications network for order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers.

We are not a subsidiary of, or an affiliated entity of SSG. We have sole responsibility for investment advice rendered, and our advisory services are provided separately and independently from SSG.

### Direction of Transactions and Commission Rates (Best Execution)

We have a fiduciary duty to put your interests before our own. SSG's advisory support services create an economic benefit to us and a potential conflict of interest to you; in that, our recommendation to custody your account(s) with SSG may have been influenced by these arrangements/services. This is not the case; we have selected SSG as the custodian of choice based on:

1. SSG's competitive transaction charges, trading platform, and on-line services for account administration and operational support.
2. SSG's general reputation, trading capabilities, investment inventory, their financial strength, and our personal experience working with SSG staff.

Since we do not recommend, suggest, or make available a selection of custodians other than SSG, and we have not verified whether their transaction fees are competitive with another custodian, **best execution may not always be achieved**. Therefore, **you do not have to accept our recommendation to use SSG as your custodian**. However, if you elect to use another custodian, **we may not be able to provide you complete institutional services**.

### Aggregating Trade Orders

Our objective in order execution is to act fairly, impartially, and to take all reasonable steps to obtain the best possible results (known as "best execution") for you, as well as with all our clients. Therefore if we are considering bunching orders, we will not bunch (aggregate) orders for a block trade unless: (i) the bunching of orders is done for the purpose of achieving best execution; and, (ii) no client is systematically advantaged or disadvantaged by bunching the orders.

In consideration of these objectives, we will take into account the unique execution factors of the buy/sell order before bunching accounts for a block trade. A few of those factors are:

- ❖ **Security Trading Volume** - Bunching orders in a block trade can secure price parity and continuity for our clients during heavy trading activity.
- ❖ **Number of Clients** - The fewer the number of client accounts involved in the bunched order may not yield better pricing or order execution; it may be more advantageous to perform an individual market order for each client. In addition preparing individual market orders, for the small number accounts involved, may be quicker to complete than preparing a bunch order.

- ❖ **Financial Instruments** - The type of security involved as well as the complexity of order can affect our ability to achieve best execution.

## REVIEW OF ACCOUNTS

ITEM 13

Each account is reviewed on an ongoing basis by our investment manager and Ms. Julie M. Decker to ensure that your needs and objectives are being met. All accounts are reviewed in the context of your stated investment objectives and guidelines. Cash needs will be adjusted as necessary.

You will receive monthly statements from SSG where your account(s) are custodied. You are encouraged to review each statement which summarizes the specific investments held, the value of your portfolio and account transactions.

You are also encouraged to review with us investment strategies and account performance on an annual basis. Material changes in your personal circumstances, the general economy, or tax law changes can trigger more frequent reviews. However, **it is your responsibility to communicate these changes to us so that the appropriate adjustments can be made.**

## CLIENT REFERRALS & OTHER COMPENSATION

ITEM 14

### Referral Compensation

We do not receive any economic benefit from an independent party for managing any of our clients' accounts. In addition, we do not compensate persons/firms for client referrals.

### Other Compensation (Indirect Benefit)

IMS receives an indirect economic benefit from SSG (See "Custodial Services" above under Item 12, "Brokerage Practices" for more detailed information on these services and products could be.).

### Insurance Compensation

For those management persons who are commissioned insurance agents, there is an incentive for them to recommend only those insurance products in which they will receive a commission. Consequently, loyalties could be divided and the objectivity of our advice could be subjective and create a disadvantage to you. Therefore, **you are under no obligation to purchase insurance products through our insurance agency, IMS Partners, Inc. You are free to choose any outside insurance agent to implement our insurance recommendations.** Keep in mind that regardless of the agent you select to purchase the insurance from, that person will be entitled to earn a commission from the sale.

## CUSTODY

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ITEM 15

### Management Fee Deduction

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We do not take possession of or maintain custody of your funds or securities, but will simply monitor the holdings within your portfolio and trade your account based on your stated investment objectives and guidelines. Physical possession and custody of your funds and/or securities shall be maintained with SSG as indicated above in Item 12, “**Brokerage Practices.**”

We are however defined as having custody since you have authorized us to deduct our advisory fees directly from your account. To protect you as well as to protect our advisory practice, we have implemented the following regulatory safeguards:

- ❖ We report to the regulatory authority (the Florida Office of Financial Regulation) having jurisdiction over our advisory practice that we have custody.
- ❖ Your funds and securities will be maintained with a qualified custodian (SSG) in a separate account in your name.
- ❖ Authorization to withdrawal our management fees directly from your account will be approved by you prior to engaging in any portfolio management services.
- ❖ At the time we notify SSG to withdrawal our quarterly fee from your account, we will send you a quarterly notice itemizing our fee. Itemization includes the formula used to calculate our fee, the amount of assets under management the fee is based on, and the time period covered by the fee.

SSG is required by law to send you, at least quarterly, brokerage statements summarizing the specific investments currently held in your account, the value of your portfolio, and account transactions. **You are encouraged to compare the financial data contained in our report and/or itemized fee notice with the financial information disclosed in your account statement from SSG to verify the accuracy and correctness of our reporting.**

## INVESTMENT DISCRETION

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ITEM 16

### Securities & Amount Bought or Sold

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We have you complete our Investment Advisory Agreement which sets forth our authority to buy and sell securities in whatever amounts are determined to be appropriate for your account and whether such transactions are with, or without, your prior approval.

You may, at any time, impose restrictions, **in writing**, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, exclude the ability to purchase securities with an inverse relationship to the market, limit our use of leverage, etc.).

## VOTING CLIENT SECURITIES

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ITEM 17

**We do not vote client proxies.** You understand and agree that you retain the right to vote all proxies, which are solicited for securities held in your managed accounts. Any proxy solicitations inadvertently received by us will be immediately forwarded to you for your evaluation and decision.

However, if you have specific questions regarding an action being solicited by the proxy that you do not understand, or you want clarification, you may contact us, and we will explain the particulars. Keep in mind we will not advise you in a direction to vote, that ultimate decision will be left to you.

## FINANCIAL INFORMATION

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ITEM 18

We are not required to include financial information in our Disclosure Brochure since we will not take physical custody of client funds or securities or bill client accounts six (6) months or more in advance for more than \$500.

We are not aware of any current financial conditions that are likely to impair our ability to meet our contractual commitments to you. In addition, the Company has not, nor have any of our officers and directors, been the subject of a bankruptcy petition at any time during the past ten years.

## REQUIREMENTS FOR STATE-REGISTERED ADVISERS

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ITEM 19

Information on each of our principal executive officers and management persons can be found in the attached “Brochure Supplements”.

**END OF DISCLOSURE BROCHURE**

## FORM ADV: PART 2B

### BROCHURE SUPPLEMENT



## Investment Management Services Group, LLC

4800 Dairy Road, Suite 101  
Melbourne, Florida 32904

### BRANCH OFFICE LOCATION

601 21<sup>st</sup> Street  
Suite 300  
Vero Beach, Florida 32960

### CONTACT INFORMATION

Tel: 321.837.0741  
Fax: 321.837.0742

### SUPERVISION

**Julie M. Decker**  
Chief Compliance Officer

Tel: 321.837.0741  
e-mail: julie@imspartners.net

Ms. Decker is responsible for the regulatory oversight of our advisory practice - ensuring that we are operating in compliance with federal and state regulations.

Her other responsibilities include, but are not limited to, supervising portfolio management, performing portfolio management reviews, and meeting with clients to discuss their investment options.

BROCHURE SUPPLEMENT  
DATED

1

**JANUARY  
2020**

This Brochure Supplement provides information about Julie M. Decker that is an accompaniment to the Disclosure Brochure for our firm, Investment Management Services Group, LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Ms. Decker, you are welcome to contact us - our contact information is listed to the left.

Additional information about Investment Management Services Group, LLC and Julie M. Decker is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Julie M. Decker

CRD#: 1859609

Year of Birth: 1956

### EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

#### Education

Ms. Decker attended Colorado State University for three (3) years, earning credits in business management and finance but did not complete her degree. She has worked for over 20 years helping retirees maintain and improve their lifestyle with safe, yet effective strategies. Julie has also been recognized for her expertise in IRA planning and distribution. She works closely with tax accountants helping them understand retiree's investments. Julie has developed numerous courses and seminars designed to help seniors in all aspects of financial planning. The knowledge she has gained from her hands-on training and experience working in the financial fields, in many cases, is far more beneficial than anything learned from a college text book.

#### Licenses

FINRA Exams: Series 6 - Investment Company and Variable Contracts Products Rep. (Retired)  
Series 65 - Uniform Investment Advisor Law Examination (Active)

Insurance: 2-15 License - Florida Life, Health & Variable Annuity Insurance

#### Business Background

07/2007 - Present.....Investment Management Services Group, LLC  
Position: Managing Member & Chief Compliance Officer

08/2002 - Present.....IMS Partners, Inc.  
Position: President & General Agent

### DISCIPLINARY INFORMATION

Ms. Decker is required to disclose any administrative proceedings that may be material for you to evaluate her advisory practice; therefore, pursuant to Item 3B of the Form ADV Part 2B: Brochure Supplement we are disclosing the following event.

Through the course of a routine investigation, the Florida Department of Financial Services ("Department") found Ms. Decker authorized an employee of IMS Partners, Inc., under her direct supervision and control, to telephone insurers while impersonating insured in an effort to learn about the insurer's investments. In addition, the Department alleged Ms. Decker sold annuities that replaced other annuities without truthfully disclosing those exchanges and the funding sources for the purchased annuities.

So as to not incur any further legal costs and the inconvenience defending herself against the allegations made by the Department in their Administrative Complaint, Ms. Decker consented to the findings by the Department and settled with an administrative fine for \$7,500 and agreed to probation for two-(2) years. The fine has been paid pursuant to the terms of the Settlement Stipulation for Consent Order finalized in April of 2016 and the probation period completed. No further action has been taken by the Department against Ms. Decker.

### OTHER BUSINESS ACTIVITIES

#### Insurance Agency Affiliation

As indicated in our firm Disclosure Brochure (See Item 10, "Other Financial Industry Activities & Affiliations" for more details), Ms Decker serves as President and CEO to IMS Partners, Inc., a full-service Florida Resident Insurance Agency providing a wide range of insurance-based products for individuals and their families. Referrals by Ms. Decker to IMS Partners can create a potential conflict of interest to our fiduciary duty to be impartial with our advice and to keep your interests ahead of our own. As the primary control person of both entities, Ms. Decker is able to influence you to use IMS Partners for your life, health, and annuity insurance needs and to use Investment Management Services Group for portfolio management. Before accepting recommendation from Ms. Decker to engage either party, IMS Partners and/or Investment Management Services Group, you should consider other options to ensure that the services received from these entities is comparable or equivalent to the service you might receive elsewhere.





## Investment Management Services Group, LLC

4800 Dairy Road, Suite 101  
Melbourne, Florida 32904

### BRANCH OFFICE LOCATION

601 21<sup>st</sup> Street  
Suite 300  
Vero Beach, Florida 32960

### CONTACT INFORMATION

Tel: 321.837.0741  
Fax: 321.837.0742

### Continuation of Information for:

## Julie M. Decker

CRD#: 1859609  
Year of Birth: 1956

### Licensed Insurance Agent

Ms. Decker is a licensed independent insurance agent. She will receive the normal commissions associated with insurance sales. This creates an incentive for her to recommend, should you inquire, those products in which she will receive a commission. Consequently, the objectivity of the advice rendered could be subjective and create a disadvantage. You are under no obligation to accept Ms. Decker's recommendation to purchase any insurance products. You are free to choose any independent insurance agent and insurance company to purchase your insurance. Regardless of the insurance agent from whom you select to purchase your insurance, he/she will earn the normal commission from the sale.

For more information about the potential conflicts of interest, see our Disclosure Brochure in Item 14, "Client Referrals & Other Compensation". Notwithstanding such potential conflicts of interest, we strive to act in your best interest and ensure disclosure is properly made to you in compliance with the Investment Advisor Act of 1940, Rule 275.206.

### ADDITIONAL COMPENSATION

Ms. Decker does not receive any economic benefit, sales awards, prizes or bonuses that are based on the number or amount of sales, client referrals, or from opening new accounts.

### REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Ms. Decker has not been the subject of any arbitration claim, civil litigation, self-regulatory organization/administrative proceeding, or bankruptcy petition at any time during the past ten years.

## FORM ADV: PART 2B

### BROCHURE SUPPLEMENT



## Investment Management Services Group, LLC

4800 Dairy Road, Suite 101  
Melbourne, Florida 32904

### BRANCH OFFICE LOCATION

601 21<sup>st</sup> Street  
Suite 300  
Vero Beach, Florida 32960

### CONTACT INFORMATION

Tel: 321.837.0741  
Fax: 321.837.0742

### SUPERVISION

**Julie M. Decker**  
Chief Compliance Officer

Tel: 321.837.0741  
e-mail: julie@imspartners.net

Ms. Decker is responsible for the regulatory oversight of our advisory practice - ensuring that we are operating in compliance with federal and state regulations.

Her other responsibilities include, but are not limited to, supervising portfolio management, performing portfolio management reviews, and meeting with clients to discuss their investment options.

BROCHURE SUPPLEMENT  
DATED

1

**JANUARY  
2020**

This Brochure Supplement provides information about Paul F. McCarthy that is an accompaniment to the Disclosure Brochure for our firm, Investment Management Services Group, LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. McCarthy, you are welcome to contact us - our contact information is listed to the left.

Additional information about Investment Management Services Group, LLC and Paul F. McCarthy is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Paul F. McCarthy

CRD#: 1298685

Year of Birth: 1958

### EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

#### Education

Mr. McCarthy attended St. Ambrose College for two (2) years, earning credits in business management and finance but did not complete his degree. For over 20 years, Mr. McCarthy has worked with numerous attorneys who have dealt with all forms of Financial Management, Estate Planning, and Estate Settlement Services throughout Florida. His background includes: Investments Manager and Retirement Coordinator for Financial Resources Group in Vero Beach, Florida and Vice-President and Retirement Coordinator with Dean Witter Reynolds, Inc. Mr. McCarthy has been on radio talk shows and was featured in Financial Planning Magazine. The knowledge Mr. McCarthy has gained and working experiences in the financial fields, in many cases, has been far more beneficial than anything learned from a college text book.

#### Licenses

FINRA Exams: Series 7 - General Securities Representative (Retired)  
Series 63 - Uniform Securities Agent State Law Examination (Retired)  
Series 65 - Uniform Investment Advisor Law Examination (Active)  
Series 66 - Uniform Combined State Law Examination (Retired)

Insurance: 2-15 License - Florida Life, Health & Variable Annuity Insurance

#### Business Background

04/2011 - Present.....Investment Management Services Group, LLC  
Position: Investment Advisor Representative

08/2002 - Present.....IMS Partners, Inc.  
Position: Vice President & Insurance Agent

### DISCIPLINARY INFORMATION

Mr. McCarthy is required to disclose any administrative proceedings that may be material for you to evaluate his advisory practice; therefore, pursuant to Item 3B of the Form ADV Part 2B: Brochure Supplement we are disclosing the following event.

Through the course of a routine investigation, the Florida Department of Financial Services ("Department") found Mr. McCarthy authorized an employee of IMS Partners, Inc., under his direct supervision and control, to telephone insurers while impersonating insured in an effort to learn about the insurer's investments. In addition, the Department alleged Mr. McCarthy sold annuities that replaced other annuities without truthfully disclosing those exchanges and the funding sources for the purchased annuities.

So as to not incur any further legal costs and the inconvenience defending himself against the allegations made by the Department in their Administrative Complaint, Mr. McCarthy consented to the findings by the Department and settled with an administrative fine for \$7,500 and agreed to probation for two-(2) years. The fine has been paid pursuant to the terms of the Settlement Stipulation for Consent Order finalized in April of 2016 and the probation period completed. No further action has been taken by the Department against Mr. McCarthy.

### OTHER BUSINESS ACTIVITIES

#### Insurance Agency Affiliation

As indicated in our firm Disclosure Brochure (See Item 10, "Other Financial Industry Activities & Affiliations" for more details), Mr. McCarthy serves as Vice President to IMS Partners, Inc., a full-service Florida Resident Insurance Agency providing a wide range of insurance-based products for individuals and their families. Referrals by Mr. McCarthy to IMS Partners can create a potential conflict of interest to our fiduciary duty to be impartial with our advice and to keep your interests ahead of our own. As a control person of IMS Partners, Mr. McCarthy is able to influence you to use IMS Partners for your life, health, and annuity insurance needs. Before accepting recommendation from Mr. McCarthy to engage IMS Partners you should consider other options to ensure that the services received are comparable or equivalent to services you might receive elsewhere.





## Investment Management Services Group, LLC

4800 Dairy Road, Suite 101  
Melbourne, Florida 32904

### BRANCH OFFICE LOCATION

601 21<sup>st</sup> Street  
Suite 300  
Vero Beach, Florida 32960

### CONTACT INFORMATION

Tel: 321.837.0741  
Fax: 321.837.0742

### Continuation of Information for:

## Paul F. McCarthy

CRD#: 1298685  
Year of Birth: 1958

### Licensed Insurance Agent

Mr. McCarthy is a licensed independent insurance agent. He will receive the normal commissions associated with insurance sales. This creates an incentive for him to recommend, should you inquire, those products in which he will receive a commission. Consequently, the objectivity of the advice rendered could be subjective and create a disadvantage. You are under no obligation to accept Mr. McCarthy's recommendation to purchase any insurance products. You are free to choose any independent insurance agent and insurance company to purchase your insurance. Regardless of the insurance agent from whom you select to purchase your insurance, he/she will earn the normal commission from the sale.

For more information about the potential conflicts of interest, see our Disclosure Brochure in Item 14, "Client Referrals & Other Compensation". Notwithstanding such potential conflicts of interest, we strive to act in your best interest and ensure disclosure is properly made to you in compliance with the Investment Advisor Act of 1940, Rule 275.206.

### ADDITIONAL COMPENSATION

Mr. McCarthy does not receive any economic benefit, sales awards, prizes or bonuses that are based on the number or amount of sales, client referrals, or from opening new accounts.

### REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. McCarthy has not been the subject of any arbitration claim, civil litigation, self-regulatory organization/administrative proceeding, or bankruptcy petition at any time during the past ten years.

## FORM ADV: PART 2B

### BROCHURE SUPPLEMENT



## Investment Management Services Group, LLC

4800 Dairy Road, Suite 101  
Melbourne, Florida 32904

### CONTACT INFORMATION

Tel: 321.837.0741  
Fax: 321.837.0742

### SUPERVISION

**Julie M. Decker**  
Chief Compliance Officer

Tel: 321.837.0741  
e-mail: julie@imsagency.com

Ms. Decker is responsible for the regulatory oversight of our advisory practice - ensuring that we are operating in compliance with federal and state regulations.

Her other responsibilities include, but are not limited to, supervising portfolio management, performing portfolio management reviews, and meeting with clients to discuss their investment options.

BROCHURE SUPPLEMENT  
DATED

1

**JANUARY  
2020**

This Brochure Supplement provides information about Thomas W. Markosky that is an accompaniment to the Disclosure Brochure for our firm, Investment Management Services Group, LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Markosky, you are welcome to contact us - our contact information is listed to the left.

Additional information about Investment Management Services Group, LLC and Thomas W. Markosky is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Thomas W. Markosky, CFP®

CRD#: 2790860

Year of Birth: 1944

### EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

#### Education

1967 - University of Washington: Bachelor of Business Administration  
1990 - University of Washington: Masters of Business Administration

#### Licenses

FINRA Exams: Series 7 - General Securities Representative (Retired)  
Series 63 - Uniform Securities Agent State Law Examination (Retired)  
Series 65 - Uniform Investment Advisor Law Examination

Insurance: 2-15 License - Florida Life, Health & Variable Annuity Insurance (Retired)

Designations: **CERTIFIED FINANCIAL PLANNER™ (CFP®) Certification**<sup>1</sup> - The CFP® designation is issued by the Certified Financial Planner Board of Standards, Inc. The CFP® requires certificate holders to have a bachelor's degree, three (3) years professional working experience in the area of financial planning, and to successfully pass the examination process. To retain their CFP® designation certificate holders are required to pay an annual certification fee, complete 30-hours of continuing education every two (2) years and adhere to the CFP® Board's Code of Ethics and Professional Responsibility, Rules of Conduct, and Financial Planning Practice Standards.

#### Business Background

01/2009 - Present .....Investment Management Services Group, LLC  
Position: Investment Manager & Independent Contractor  
04/2011 - Present .....Edgewater Advisors, LLC  
Position: Managing Member  
02/2006 - 12/2014 .....BeWell Global, LLC  
Position: Managing Member  
04/2005 - 12/2007 .....Edgewater Advisors, LLC  
Position: Managing Member & Chief Compliance Officer

### DISCIPLINARY INFORMATION

Mr. Markosky is required to disclose any administrative proceedings that may be material for you to evaluate his advisory practice; therefore, pursuant to Item 3B of the Form ADV Part 2B: Brochure Supplement we are disclosing the following event.

Through the course of conducting a routine on-site examination, the Florida Office of Financial Regulation ("OFR"), alleged Thomas W. Markosky violated Florida rules and regulations by: (i) misrepresenting that he had the CERTIFIED FINANCIAL PLANNER™ (CFP®) designation on his Form U-4; (ii) not maintaining an accurate Form ADV Part 2B: Brochure Supplement for Mr. Markosky, which improperly identified him as having CFP® designation; and, (iii) failing to maintain and update his Form U-4 with accurate information.

So as to not incur any further legal costs and the inconvenience defending himself against the allegations made by OFR in their Administrative Complaint, the Company consented to the findings by OFR, **without admitting or denying the allegations**, and settled with an administrative fine of \$6,000. The fine has been paid pursuant to the terms of the Stipulation and Consent Agreement finalized in October 2016. No further action has been taken by OFR and Mr. Markosky is operating in good standing.

### OTHER BUSINESS ACTIVITIES

Mr. Markosky is not involved in any other business activities requiring disclosure. Full focus of his attention is directed to addressing your investment needs.

<sup>1</sup> Certified Financial Planner Board of Standards, Inc. owns the certification marks CFP®, CERTIFIED FINANCIAL PLANNER™, and federally registered CFP (with flame logo), which it awards to individuals who successfully complete initial and ongoing certification requirements.





**Investment  
Management  
Services Group,  
LLC**

4800 Dairy Road, Suite 101  
Melbourne, Florida 32904

**CONTACT INFORMATION**

Tel: 321.837.0741  
Fax: 321.837.0742

*Continuation of Information for:*

**Thomas W. Markosky**

CRD#: 2790860

Year of Birth: 1944

**ADDITIONAL COMPENSATION**

Mr. Markosky does not receive any economic benefit, sales awards, prizes or bonuses that are based on the number or amount of sales, client referrals, or from opening new accounts.

**REQUIREMENTS FOR STATE-REGISTERED ADVISERS**

Item 7B of the Form ADV Part 2B: Brochure Supplement requires disclosure of any bankruptcy petition, the date the petition was first brought, and the current status.

In September of 2014, Mr. Markosky filed for bankruptcy brought on by his business venture, BeWell Global, LLC struggling with operating costs and lack of consumer confidence and interest in wellness products due to a weak economy. Mr. Markosky tried everything in his power to engage consumers with his health products through increased marketing, cutting back expenses, and reducing overhead but was unable to counter the effects of the economic environment. Finally, after trying unsuccessfully to keep up with his financial obligations, Mr. Markosky filed for bankruptcy protection and in February 2015, the bankruptcy was discharged.