

## Form ADV Part 3: Relationship Summary

KWVG, LLC

### Introduction

KWVG, LLC ("Keen Wealth Advisors") is an investment adviser registered with the U.S. Securities and Exchange Commission. We offer our clients investment advisory services. Clients should understand that the services we provide and fees we charge are different than those of a broker-dealer, and that it is important to understand the difference between the two. Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about investment advisers, broker-dealers and investing.

### What Investment Services and Advice Can You Provide Me?

**Description of Services:** We offer the following investment advisory services to retail investors: Comprehensive Portfolio and Asset Management Services: Keen Wealth Advisors provides asset management services which involves us managing and trading your designated account(s). We will discuss your investment goals and design a strategy to try and achieve your investment goals. We will continuously monitor your account and contact you at least annually to discuss your portfolio. We offer asset management services through both wrap fee programs and non-wrap fee programs. We typically provide asset management services on a **discretionary** basis, which means we have the authority to determine the type and amount of securities to be bought or sold in your account. We can also provide services on a **non-discretionary** basis, which means that we would have to confirm all trades in your account with you before we place them. We only provide non-discretionary services on a limited basis. Financial Planning & Consulting Services: Financial planning services involve us creating a written financial plan for you which covers mutually agreed upon topics. Financial consulting is used when a written financial plan isn't needed. It involves meetings to discuss your financial situation. Retirement Plan Participant Advice: If your retirement plan utilizes our Retirement Plan Participant Advice Service, we are available at your request to provide one-on-one advice to you as a retirement plan participant regarding your investment options under the plan. Please see **Item 4** of our **Form ADV Part 2A**.

**Limited Investment Offerings:** We do not primarily recommend one type of security to clients. Instead, we recommend any security that may be suitable for each client relative to that client's specific circumstances and needs. However, we are limited in investment selection in that we can only invest your account in securities which are available on your custodian/broker-dealer's platform. We do not recommend or offer advice on any proprietary products.

**Account & Fee Minimums:** We do not have any requirements for retail investors to open, establish, or maintain a relationship such as a minimum account size or investment amount. For more information, please see **Item 4 and Item 16** of our **Form ADV Part 2A**.

**Conversation Starters:** *Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

### What Fees Will I Pay?

**Description of Principal Fees & Costs:** Asset management services are charged based on a percentage of assets under management, billed in advance on a quarterly calendar basis, and calculated based on the fair market value of your account as of the last business day of the previous quarter. The annual fee is based upon a fee schedule which ranges between 1.60% and 2.00%. We have an incentive to recommend that you increase the level of assets in your account. We utilize wrap fee and non-wrap fee programs. Under a wrap fee program, the fee you pay us covers both our advisory services and the transaction fees imposed by the broker-dealer. Under a non-wrap fee program, you will be charged transaction costs separately. Wrap fee programs tend to be a higher fee than non-wrap fee programs. You may also be charged management fees by the funds we invest in, within your account. Financial planning and consulting services are provided under an hourly fee or fixed fee arrangement. The hourly fee is \$350. The minimum fixed fee is generally \$1,500 and the maximum fixed fee is generally no more than \$10,000. You will pay a portion of the fee in advance with any unpaid fees are due immediately upon completion of the services. Any fees we charge for financial planning and consulting services will not cover the costs associated with implementing any recommendations we may make. For our Retirement Plan Participant Advice, there is no direct charge to the plan participant; rather, we charge the retirement plan an investment advisory fee.

**Additional Information:** You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more information about the fees we charge and the other fees and expenses you will incur, please see **Item 4** of our **Form ADV Part 2A: Appendix 1 and Item 5** of **Form ADV Part 2A**.

**Conversation Starters:** Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

**What Are Your Legal Obligations to Me When Acting as My Investment Adviser?  
How Else Does Your Firm Make Money and What Conflicts of Interest Do You Have?**

**Standard of Conduct:** When we act as your investment adviser, we must act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

- 1) We have an investment advisor representative who is also a licensed insurance agent. When acting in this capacity he will receive commissions for selling insurance products. This creates a conflict of interest when he recommends you purchase insurance products through him.
- 2) Some investment advisor representatives are also registered representatives of Purshe Kaplan Sterling Investments, Inc., a securities broker-dealer. When acting in this separate capacity, they will receive commissions for selling products or securities which creates a conflict of interest.
- 3) When you utilize a third-party to manage your assets, we receive a portion of the fee. This creates a conflict of interest as we have an incentive to recommend managers who have such arrangements with us.
- 4) To the extent we recommend you roll over your account from a current retirement plan to an individual retirement account ("IRA") managed by us and subject to our asset-based investment advisory fees, this is a conflict of interest because we have a financial incentive to recommend that you move your IRA to us even if it is not in your best interest.

**Additional Information:** For more information about our conflicts of interests and the ways we are compensated, please see **Item 4**, **Item 5** and **Item 10** of our **Form ADV Part 2A**.

**Conversation Starters:** How might your conflicts of interest affect me, and how will you address them?

**How Do Your Financial Professionals Make Money?**

**Description of Salary/Payment of IARs:** We compensate our investment adviser representatives by paying them an annual salary. They also have the ability to participate in our company wide revenue sharing pool. This creates a conflict of interest as it gives your representative an incentive to recommend you invest more in your account with us due to the potential for increased compensation.

**Do You or Your Financial Professionals Have Legal or Disciplinary History?**

William Keen consented to an Order by the State of Missouri for investing customer funds in "unsuitably aggressive investments" between 1999-2001. He complied with heightened supervision requirements for two years and paid a \$40,000 fine plus the cost of the investigation. William Keen consented to an Order by the Ohio Division of Securities related to the Order issued by the State of Missouri which subjected him to one year of heightened supervision completed in 2008. Mr. Keen successfully completed his heightened supervision and has had no complaints in Ohio or any other state other than those stemming from the 1999-2001 time period. Please review **Item 9** of our **Form ADV Part 2A**. You can look up more information about us and our investment adviser representatives at <https://www.investor.gov/CRS>.

**Conversation Starters:** As a financial professional, do you have any disciplinary history? For what type of conduct?

**Additional Information About Keen Wealth Advisors**

Additional information about us and copies of our Form ADV Part 2A disclosure brochure are available on the Internet at [www.keenwealthadvisors.com](http://www.keenwealthadvisors.com). You can also find our disclosure brochures and other information about us at <https://www.adviserinfo.sec.gov/firm/summary/170293>. If you have any questions or want an up-to-date copy of this relationship summary, we can be reached by phone at 913-624-1841.

Additional information about our broker-dealer relationship with Purshe Kaplan Sterling Investments, Inc., can be found at <https://www.pksinvest.com/> or <https://brokercheck.finra.org/firm/summary/35747>.

**Conversation Starters:** Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?